

1
2
3
4 IN THE CIRCUIT COURT OF THE STATE OF OREGON
5 FOR THE COUNTY OF LINN

6 In the Matter of the Guardianship of:
7 KYE CHRISTOPHER JANSSEN,
8 Minor Child.

Case No.: 15PR00032
PROTECTIVE ORDER

9 In the Matter of:
10 DONNA DOVE and
11 RAENI COLETON-RUSKE
12 Petitioners,
13 BLAINEY O'SHEA ELKINS
14 Respondent.

Case No.: 22DR00154
PROTECTIVE ORDER

15 This matter comes before the Court on the motion of Petitioners for a Qualified
16 Protective Order. Petitioners are represented by Lorena Reynolds and Respondent is
17 represented by Andrew Ivers. The Court, having reviewed the file and being fully
18 informed herein, now makes the following findings:

19 1. The Qualified Protective Order prohibits the disclosure of "Protected Documents"
20 about Kye Christopher Janssen, Donna Dove, and Raeni Coleton-Ruske to the
21 general public.

22 It is now ordered:

23 1. For the purpose of this order, "protected documents" means individually identifiable
24 reports, statements, records, photographs of, video or audio recording of, or other
25 documents that are created or received by health care providers, schools and
26 educational facilities, banks, any other third-party entity, or the parties which relate to

The Reynolds Law Firm, PC
555 NW Fifth Street
Corvallis, OR 97330
(541) 738-1800 / (541) 738-1801 Fax
info@ReynoldsLaw.us

1 Kye Christopher Janssen, Donna Dove, and Raeni Coleton-Ruske, or any other
2 records with personal identifying information about these individuals.

3 2. Protected documents may be used in connection with this legal proceeding only, and
4 the parties are restrained from using the protected documents, or information
5 obtained from such material, for any purpose other than this legal proceeding, and
6 are further restrained from disclosing such protected documents to any person other
7 than:

8 2.1. The Petitioners herein;

9 2.2. The attorneys of record for the parties herein and persons regularly employed by
10 such attorneys;

11 2.3. The custody evaluator, Dr. Poppleton, appointed by the Court in this case; or

12 2.4. The court.

13 3. If any protected documents were disseminated prior to entry of this order,
14 Respondent Blainey Elkins is ordered to disclose, within 14 days of entry of this order,
15 what protected documents were disclosed, to whom, and when. Respondent and her
16 attorney shall make all reasonable efforts to recover the disseminated records. If
17 digital copies were disseminated, Respondent and her attorney shall make
18 reasonable efforts to ensure the recipient of the records permanently deletes them.

19 4. Upon termination of this case, the original and all copies of all protected documents
20 shall be held confidential by the attorneys handling the case and will not be used for
21 any purpose unrelated to litigation between these parties. Respondent will return all
22 original and copies she has of protected documents to her attorney for destruction.
23 This Order will remain in effect in perpetuity. The attorney shall ensure that any paper
24 copies of the protected material are returned to them and destroyed or kept in a
25 secure file. The attorney will also ensure that any electronic copies of the protected
26 material are kept only on secure servers or destroyed. This includes not sending an

The Reynolds Law Firm, PC
555 NW Fifth Street
Corvallis, OR 97330
(541) 738-1800 / (541) 738-1801 Fax
info@ReynoldsLaw.us

1 electronic copy of the material to anyone by email. Respondent is prohibited from
2 making any paper or digital copies of the material and must return any paper copies
3 to her attorney for destruction after the trial in this matter is completed.

4 5. Respondent is prohibited from accessing all protected documents directly from any
5 source. This includes a suspension of her rights to access the child's medical,
6 healthcare, dental, or mental health records, school records, and any other records
7 relating the child that she would otherwise have access to under ORS 107.154.

8 6. Notwithstanding anything to the contrary which may be set forth herein, a party may
9 apply to the Court at any time for an Order:

10 6.1. Requesting a modification of this Qualified Protective Order;

11 6.2. Determining that the material designated as protected documents should not be
12 subject to this order; and

13 6.3. Granting additional protective relief with respect to any protected documents.

14 7. All parties and attorneys of record and persons regularly employed by such attorneys
15 in this litigation are specifically prohibited from disseminating any protected
16 documents, or information obtained from these documents, to any third party,
17 including but not limited to Stephanie Volin.

18 8. The Order shall apply to all parties to this litigation, including Respondent and putative
19 Father, Kyle Janssen, and the terms of this order shall survive and remain in full force
20 and effect after the termination of this litigation.



4/10/2024 9:36:26 AM

24 Prepared and submitted by **Circuit Court Judge, Brendan J. Kane**
25 Lorena Reynolds, OSB No. 981319
26 Of Attorneys for Petitioners

The Reynolds Law Firm, PC
555 NW Fifth Street
Corvallis, OR 97330
(541) 738-1800 / (541) 738-1801 Fax
info@ReynoldsLaw.us

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF LINN

In the Matter of the Guardianship of:
KYE CHRISTOPHER JANSSEN,
Minor Child.

Case No.: 15PR00032
CERTIFICATE OF READINESS

In the Matter of:
DONNA DOVE and
RAENI COLETON-RUSKE
Petitioners,
BLAINEY O'SHEA ELKINS
Respondent.

Case No.: 22DR00154
CERTIFICATE OF READINESS

I certify that this proposed Order is ready for judicial signature because:

Each party affected by this order has stipulated to or approved the order, as shown by the signatures on the order, or by written confirmation sent to me.

DATED: April 5, 2024.

The Reynolds Law Firm, PC



Lorena Reynolds, OSB # 981319
Of Attorneys for Petitioners

The Reynolds Law Firm, PC
555 NW 5th Street, Corvallis, OR 97330
(541) 738-1800 / (541) 738-1801 Fax
info@ReynoldsLaw.us

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF LINN

In the Matter of the Guardianship of:
KYE CHRISTOPHER JANSSEN,
Minor Child.

Case No.: 15PR00032
CERTIFICATE OF SERVICE

In the Matter of:
DONNA DOVE and
RAENI COLETON-RUSKE
Petitioners,
BLAINEY O'SHEA ELKINS
Respondent.

Case No.: 22DR00154
CERTIFICATE OF SERVICE


I hereby certify that I served Respondent/Cross Petitioner, Blainey Elkins, by and through her attorney, Andrew Ivers, with the following documents:

- Protective Order

By e-service to andy@ivers.law.

DATED: April 5, 2024

The Reynolds Law Firm, PC



Lorena Reynolds, OSB # 981319
Of Attorneys for Petitioners

The Reynolds Law Firm, PC
555 NW 5th Street, Corvallis, OR 97330
(541) 738-1800 / (541) 738-1801 Fax
info@ReynoldsLaw.us