Filed in District Court
State of Minnesota
6/29/2026 8:20 AM

STATE OF MINNESOTA DISTRICT COURT

COUNTY OF OTTER TAIL SEVENTH JUDICIAL DISTRICT

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Craig Stevenson, Marie Stevenson,

Plaintiffs, File No. 56-CV-20-2928

vs. Transcript of Proceedings

Sean Stevenson, Renee Stevenson,
Lisa Stevenson-Allen, Ashley Anderson,

Defendants.

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MOTION HEARING

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The above-entitled matter came before the Honorable Kevin M. Miller, Judge of District Court, at the Otter Tail County Courthouse, via Zoom technology, Fergus Falls, Minnesota, on May 22, 2026.

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APPEARANCES

For the Plaintiffs: Cassandra Wolfgram
14985 Glazier Ave, Suite 525
Apple Valley, MN 55124

For the Defendants: Ross Tentinger
Joseph Tourand
Ashley Anderson and 14665 Galaxie Ave, Suite 140
Renee Stevenson and Apple Valley, MN 55124
Sean Stevenson

Lisa Stevenson-Allen is pro se.

Dana Eifert
Official Court Reporter

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(Proceedings commenced.)

THE COURT: All right. Good morning, everyone.

At this time, the Court will call the matter set for 9:30, which is titled Craig Stevenson, Marie Stevenson versus Sean Stevenson et al, file 56-CV-20-2928. I have Ms. Wolfgram here on behalf of the plaintiffs, who are present. I have Mr. Tentinger, and I'm not going to -- is it Mr. Tourand?

MR. TOURAND: That, that's correct, Your Honor. Tourand.

THE COURT: All right. Here on behalf of the remaining defendants.

The Court is here on the motions that have been filed. I've reviewed the motions and affidavit, but not any of the documents that were listed. I wasn't going to go through all of those at this time. However, I'll first turn to Mr. Tentinger, and then I'll go back to Ms. Wolfgram, and you can both respond and address your own motion. Then I'll be going back to Defendants for responses. So Mr. Tentinger, you may proceed.

MR. TENTINGER: Wonderful. Thank you, Your Honor.

Defendants have brought this motion for a few reasons. First, given the website showcasing this litigation that we've identified in the filings,

Defendants want to be able to respond to friends and family members truth-- truthfully, without fear of violating the protective order, who may come across that website or learn about this lawsuit through that website.

Two, Defendants want to be able to preserve and use the fact record in this case if plaintiffs ever bring these issues back to court. As we touched on in the filings as well, that has already happened once when Plaintiffs -- or excuse me, Plaintiff Marie Stevenson brought an HRO against Sean Stevenson in Dakota County. Notably, some of her medical records that were marked confidential in this case were used in that HRO proceeding. And then, based on the protective order, Sean isn't able to necessarily use some of the records in this case for that defense. So that's the other concern.

Third, they want to be able to avoid, essentially, being blamed for any alleged disclosure that was not from them but was instead disclosed or published on Plaintiff's website. They are very concerned that this is going to end up in just additional litigation, given the tone of that website and the tone of everything else that's happened so far.

At the outset, this Court has subject matter jurisdiction to hear this motion. The arguments otherwise are unpersuasive. None of the cases cited by

Plaintiffs on this topic address protective orders or the ongoing nature of them, even post-judgment. The rules of appellate procedure and caselaw, we believe, show that jurisdiction remains with this Court.

Next, burden. Plaintiffs dispute that they have the burden here to show good cause. Not only does the protective order instruct that when a designation is challenged, as we are here, it states, the party asserting that material as confidential shall have the burden of proving that the information falls within the scope of 26.03. The caselaw, when considering a blanket protective order as here, overwhelmingly supports a position that the party asserting confidentiality also has the burden. In this case, there has never been a good cause hearing as to the confidentiality of any document. Instead, Plaintiffs have freely and without showing good cause designated significant portions of the record as confidential. It is now their burden to establish good cause for that designation to remain.

And as we identified in our filings, Defendants believe that that position or excuse me, Defendants believe that Plaintiffs have not met that burden. General veer mixed to privacy and confidentiality do not satisfy a good cause burden. And without that showing, Minnesota Courts looked to the balancing test and factors

identified in *Humphrey*. That was a Court of Appeals decision in 2000. And it provides a list of a variety of factors that the Court can consider whether to amend a protective order or to remove designations.

I'll largely rest on our written materials for that, but I just want to address whether there's a need for ongoing continued confidentiality. To that factor, Defendants say, no, there's not. Plaintiffs have created an entire public website dedicated to this lawsuit. That website discusses the parties. It discusses counsel. It discusses this Court. This Court's rulings. And it portrays Plaintiffs' versions of the facts. Plaintiffs have placed this case in the public forum. They have shined a spotlight on it, and they invited the public to view this case through their lens. But at the same time, Plaintiffs are asking this Court to keep large portions of the underlying record confidential. That creates an unfair and unworkable situation for Defendants. Plaintiffs can speak freely about this case. They can characterize the evidence as they please, and they can have -- and -- they can, and they have published their narrative. But Defendants remain constrained by the blanket protective order and its confidentiality designations. One for which no sh-- no good cause has been made yet. They're using the protective order as a

weapon to prevent the truth from coming out, which it was not intended to do. It was intended to facilitate discovery. It was not intended to let one side publicly litigate its version or events while preventing access to the record necessary to show the full story. And Defendants are feeling the results of this in their lives.

Sean, for example, has children. He wants to be able to explain to them what this lawsuit is about, what it was about. And he should be able to do so with full transparency. Especially, now, if his children Google his name, they may stumble upon Plaintiff's website. Someone at their school might show Sean's kids that website. He wants to be able to explain to him the full breadth of what occurred and not be constrained by the protective order. The continued broad sweep and blanket confidentiality is not warranted.

The Defendants are not asking the Court for redesignation to harass Plaintiffs, as suggested by Plaintiffs. They're asking this Court to apply the protective order as written, allowing Defendants to challenge the designations. They're asking this Court to consider all of the relevant factors, and given that, remove the confidentiality where it is warranted on the documents requested.

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The final thing I have to note, Your Honor, is I realize in -- we divided this -- these documents up into three tables, table 1, 2, and 3. Table 1 being dispositive motions filings. Table 2 being records that were filed with the Court for other motions, not dispositive. And then general discovery which this Court has not seen prior. Defendants are not asking for the IME reports that were filed with summary judgment to be public filings, but they are asking for the confidentiality designation to be removed from those IME reports, both Plaintiffs and Defendants. They want to be able to preserve that evidence and not have to destroy it, or they have destroyed it, but they want to be able to have access to that in the future should these claims ever come to light. Those IME reports themselves, while part of the summary judgment record, they're not asking for those to be public filings.

And with that, Your Honor, we have nothing further at this time, absent a rebuttal.

THE COURT: All right. Ms. Wolfgram.

MS. WOLFGRAM: Thank you -- (clears throat) -- Thank you, Your Honor. And I'm just going to tell you at the outset, my allergies have been acting up, so I apologize if I am a little cracky today.

Your Honor, I want to start by addressing the

procedural history as to what's going on. As you are aware, there was an underlaying (sic) litigation. In that litigation, there was this protective order. And it was amended in January 2022. That protective order applies to all of the parties. Now, discovery was in, almost exclusively, 2022, with a few documents served in February of 2023, pursuant to the Court's orders. But the time for non-dispositive motions expired in October of 2022. This Court entered judgment in June of 2023. And during that time, Defendants did not bring any motion challenging the confidentiality of documents. They had the right to do so. They did not do so. In the meantime, this case went on appeal. They didn't appeal the protective order. Final judgment was entered by the appellate courts. Now, the case was terminated. The case was terminated on February 26 of 2026. That is when appellate judgment was entered.

Now, we have raised this too, in our filings, that the case was terminated. We have provided the caselaw on this. It has not been disputed or denied by Defendants. This is important because that date is -- started the clock for when Defendants needed to comply with their obligations to delete and destroy documents. It started on February 26th of 2026. They did not do that. They did not comply. And instead, three weeks later, --

actually, it was about two weeks later, they send a letter demanding that documents be redesignated. Thousands of pages of confidential documents. Hundreds of pages of medical records. And Plaintiffs in response said, "No. The case is terminated. What is your basis? Tell us." They refused. They demanded again that we redesignate documents. They provided no reasoning. They provided no factual reasoning. They provided no legal reasoning. And then, we provided an extensive seventeen-page correspondence responding to those thousands of pages of documents. Thousands of discovery documents, plus tens of court filings, and then almost one hundred home videos. And we again asked for their legal and factual basis for their motion. Defendants, once again, said, "No. We won't do that." That is now April. We demanded that they provide -- identify that they have deleted and destroyed the confidential documents and provide certification that they did that. They refused. They said they were not bound to delete and destroy documents. That they -- their words were, "they have no enforceable obligation," and that is in the actual memorandum that Defendants filed. And that is what led to Defendant's motion.

And I want to, just briefly, go back to this before I even get into the contempt issue, because now today,

Defendants are telling this Court that they need confidentiality removed from federally and state-protected medical records because of a website. And we've asked Defendants three separate times why they were making this request. They never identified a website. They refused to provide any information. To be clear, this -- this website was not even identified or raised until one week ago in their reply. And as this Court knows, that is an improper use of a reply because replies are limited to the facts and the legal arguments in the opposition. Instead, Defendants make up new facts in their reply for the purpose of preventing Plaintiffs to be able to respond to it. We would have brought a motion to strike that, and we also note that their documents are forty-two pages instead of the limit of thirty-five. We didn't bring a motion because this Court doesn't have subject matter jurisdiction over the motion to redesignate.

Now, in their filings, they also told this Court that they are concerned there's going to be additional litigation over alleged disclosures. At this time, and I'll get into this in more detail, Your Honor, but Defendants did not comply. And this is not a hypothetical. This is based off of Defendants' own filings. Your Honor, they provided a certification

contending that they had deleted and destroyed confidential documents while removing the actual list of documents, so we don't know what they actually alleged to have deleted and destroyed. They took off the paragraph that they had complied with their obligations of confidentiality, and removed the paragraph that they knew their obligations continued. Both of which are in the protective order. That was on May 6th. Well after their time to comply. And the problem that arises is Defendants filed additional confidential documents with this Court last week, after the time for them to comply had passed. Actually, the filings they filed on May 1 were after the time to comply. But the filings they filed last week included additional confidential documents they did not seek to have redesignated. There is no way they could have taken all reasonable measures to delete and destroy documents, the confidential documents, specifically, these ones are medical records, and then file those medical records with this Court.

Now, Your Honor, I'm going to go on to the actual arguments in here. The subject matter jurisdiction. There is no subject matter jurisdiction. And I want to be clear; Defendants have actually falsely implied a holding that does not exist to this Court. In their reply memo, they accurately cite to Minnesota Statute

480A.06, saying, the Court of Appeals has jurisdiction to consider "appeals from all final decisions of the district courts." And this is on page two. The next sentence they have is, "Therefore, absent an appeal of the protective order, this Court maintains jurisdiction to decide questions pertaining to its orders." And they cite to *Herubin*, and I apologize if I'm mispronouncing that name, *versus Finn, 603 N.W.2d 133, page 137, Minn. App 1999.* That citation does not exist. The case exists, but that holding does not exist. It's not implied. It's not dicta. It cannot be even reasonably inferred. In fact, what is said on that page is a single paragraph on subject matter jurisdiction, stating the general rule: Subject matter jurisdiction involves a court's authority to decide a class of actions and authority to decide the questions before it. And without subject matter jurisdiction, the court must dismiss. It has nothing about whether an order has been appealed. It has nothing about without an appeal, the court has subject matter jurisdiction. The reason it doesn't have that is because it does not exist, Your Honor. It is contrary to the legal binding precedential law of this state. And those cases were provided to this Court, that is, *Mingen v. Mingen, 679 N.W.2d 724, Minn. 2004.* It's *Marzitelli v. City of Little Canada, 582 N.W.2d 904,*

Minn. 1998. Those cases state that when the time for appeal expires, a pre-trial order is final. And the Court has no subject matter jurisdiction to modify it.

Now, to get around the fact that there is no subject matter jurisdiction, Defendants have now made this theory that they are not seeking modification, they're seeking enforcement. To begin with, that is not what they told the Court originally. Their actual memorandum, the initial memorandum, said they moved to amend the protective order. Their order asks the Court to amend the protective order, and they're saying -- they said in their memorandum, this is at pages seven and eight, Defendant's memorandum of law and support of the motion to amend the blanket protective order. They sought amendment throughout. It is only when they realize there wasn't subject matter jurisdiction they try to change their story. But it still doesn't work. And that's because of *State by Humphrey v. Philip Morris,* that case provides exactly why. And in that case, -- and that case is procedurally different because of the fact that there was an original protective order which was not final. The court expressly said that they would issue a final order after the case was finished, which could be amended. So on appeal, the Court of Appeals addressed that they were not addressing the original order. They

were addressing the final order after the case was completed. And the court said, the focus here is not on the original protective orders, but on the order that modified the protective orders after the (indiscernible) judgment was entered, allowing public access. Rule 26.03 does not explicitly address the standard for modification of a protective order. And that's important because what the court did, the district court, in that case, said that we -- you can designate documents as confidential, and at the end of the case, you can come back to me, and I will review to determine whether they should be public. And so, in *Humphrey*, the Court of Appeals was reviewing whether that final order, redesignating those documents, modifying the original protective order, was appropriate. And the Court of Appeals called it a modification of the protective order. Not enforcement modification.

There are no legal -- other legal authorities in the state of Minnesota addressing the subject matter jurisdiction or the modification because of the fact there is no subject matter jurisdiction. The only cases where this has come up has been in *Humphrey*, where it was an original one that was not a final one, and then in other cases where it was the AG's Office in a CID, and they were procedurally different.

Now, with that, there is no subject matter

jurisdiction. The case was terminated. The order was final in August of 2023. The Court doesn't have subject matter jurisdiction to amend an order at this point. We are unaware why Defendants have been proceeding with this motion without any good cause.

But let's go back to what they're actually asking for today. They're asking for relief from an order. Now, again, there's no subject matter jurisdiction, so the only way to get that is through Rule 60. They have not -- contend that any of the requirements in Rule 60 have been met. They don't say that there's a mistake, fraud, newly discovered evidence. There's no reason for -- to just a relief on the order. They don't allege they're entitled to relief from Rule 60. They don't allege it because they can't get it.

Now, even if they could, though, we have this giant problem of forfeiture. And I want to spend a little bit of time on this because Defendants did not provide any response to the Rule 60, nor to forfeiture. Now, as this Court knows that rights are forfeited if you do not assert them in a timely manner. And specifically, if you raise an argument at appeal and you hadn't brought it up to the district court beforehand, it's been forfeited. This case has already gone through appeal. Any objections were forfeited by the time of the appeal

because they hadn't been raised, and you can't raise them after the fact. And they don't dispute that. To be clear, they have been on notice for four years, and did not do anything to get documents redesignated by the Court in that time. That is forfeiture.

Now, when we get into the actual cases that Defendants rely upon, it appears that they did not actually look at these cases in detail because they don't support their position. They actually are contrary to them. Defendants spend a lot of time focusing on cases of *Yates* out of Ohio and *Tucker* out of Maryland. And both of those state that the Court should not be modifying protective orders to remove confidentiality provisions. The reasons why is clear in *Yates;* if the parties were free to disclose confidential information upon dismissal of a case, protective orders would cease to fulfill their intended purpose, which is to encourage full disclosure of all relevant information. And it was the same in *Tucker.* In fact, *Tucker* said that this request that the Defendants have raised that they need documents for possible future litigation is insufficient. The *Tucker* court says that the court should not be modifying or terminating a protective order in such a way that it imposes new or affirmative obligations on the parties. And the Court should avoid issuing discovery

orders that are applicable only to collateral litigation in another court. Because the obligations were agreed to by all the parties, one party cannot be free to ignore those now. And to be clear, like these have been repeatedly addressed by various courts. And in *GlaxoSmithKline*, which was the AG case filed by the Sta-- with the State of Minnesota, they also stated that. If a state has discretion to release documents under subdivision 2a, as the state argues, the provisions of the confidentiality agreement and the protective order are largely meaningless. And the provisions that grant the district court authority to determine whether documents are properly designated are nullified. And that court once again said, you can't just modify a protective order. It's important that *GlaxoSmithKline* rejected that, an attempted modification for the exact reasons the defendants are asking for today, because the state wanted to use confidential documents in a second litigation. Confidential documents which the state received from the other party. That is exactly what Defendants are asking this Court to do. To use confidential documents, and actually, not even keep them confidential, make them public, and use them in another litigation. A hypothetical litigation.

And in the meantime, each of these cases that are

cited by Defendants, they attempt to say that there's a difference between stipulated protective orders and stipulated blanket protective orders; not one case makes any differentiation between the two. Not one. That is not in *Graham*. That is not in *F.T.C vs. AbbVie*. That is not in *Guzhagin*. That is not in *Cordes* or even *Iowa Beef Processors*. *Iowa Beef Processors* isn't cited by Defendants. And also, what's not cited is *Jochims v. Isuzu Motors* in the Southern District of Iowa. This was relied upon by the Minnesota District Courts, but not cited by Defendants. Why? Because it is actually oppositive (sic) to their position today. It says that, unless a valid Rule 26c protective order is equally and fairly enforceable, parties must be able to rely upon them. And it rejected an argument that they conclude a party can be removed and be able to nullify their obligations after the fact.

Now, we can spend time in this Court addressing what the burden is, but again, there's no subject matter jurisdiction. If we are post-litigation, so to get relief from an order, it has to be Rule 60, which puts the burden on Defendants, and they have not even alleged that there's any cause for that. And all of the caselaw in the district of Minnesota in the 8th Circuit puts all that burden on defendants for modifying a protective

order after the fact. After a litigation. In fact, the cases that they cite upon have rejected, in argument, that you can remove confidentiality for use outside of the litigation. In the cases that have considered other litigation. Specifically, *Yates* and *Tucker*, they said that if it is being used for another litigation and a protective order is modified, the documents retain their confidentiality designations. It is only modified to allow use of those in the other litigation with the same protections that the parties already have them under. And even more recently, in 2024, *The United States v. Dornsbach* -- this one I did not have cited in my memorandas (sic), Your Honor. It's 730 Federal Supplement 3d 897 and specifically, it's at page 903, -- the District of Minnesota goes over that a party cannot be moving to modify the protective order to use documents it received in subsequent litigations. And that's exactly what was also rejected in *Yates* and *Tucker*.

So now, Your Honor, we go into the actual designations. Defendants somehow actually told this Court that the documents have no protected status, which on its face is incorrect. The documents, as they identified them, include psychological evaluations, medical reports, petition for a harassment restraining

order, multiple medical records, and, as this Court knows, just rules of public access; those documents are protected as it is. And medical records in particular are protected by both state and federal law. And even now, we don't know why Defendants seek to have -- make all of Plaintiff's medical records, their confidential information contained in there, including their medical record numbers, birth dates, addresses, all of which is protected under HIPAA, available to everyone that Defendants seem to want to disclose it to. But these documents are protected.

Plaintiffs have provided sufficient and significant analysis identifying each of these documents and why they're protected. Defendants have not disputed any of those. And it should be obvious to anyone that if we are disclosing testimony, deposition testimony, of abuse, victims are going to be concerned, and that's gonna cause a chilling effect. In fact, Lisa's deposition, Lisa to our knowledge, has not consented to redesignation of her deposition. Nor has she consented to redesignation of any of the documents that discuss abuse that Lisa suffered. And the only person who can consent to that is Lisa, and no one should be making that decision for her.

Defendants have not identified how they think that any of these documents lack confidentiality. They just

seem to say, if we say that they're not confidential, then they're not. And there's big questions about that. When we had to go through and find these documents, which were organized in no logical order, we -- Defendants specifically asked for six pages of medical records as plaintiff 5362, through 67, to be redesignated as public. That was in the middle of hundreds of medical -- pages of medical records. 5089 through 5361, they don't ask to be redesignated; all of which are medical records. 5368 through 5423, those are medical records. They don't ask those to be redesignated. And just for the Court's information, on Exhibit 5 of my declaration, this is the chart that's at page 27. So when you take out six pages out of hundreds of pages of medical records, a medical appointment from 2013, that's unrelated to this case, it raises significant questions. Why are you seeking that record to be redesignated as public? There's no good reason. The only logical conclusion is that it was already disclosed. Because otherwise, you wouldn't care. You wouldn't want that one report.

We also, Your Honor, specifically brought up first amendment, right of free speech and association. This is addressed *GlaxoSmith and Kline (sic)*, that confident-- confidentiality is necessary because it can chill the freedom of association, and particularly subject members

to harassment or intimidation, and this case arose because of Defendant's beginning a campaign to cause harm to Plaintiff by intentionally contacting people and making false statements about them. And as of today, when they're coming back and asking for thousands of pages to be redesignated, it brings us significant concerns as to what the actual purpose is.

Now, I also want -- I did speak briefly about the future disputes, Your Honor, the Courts have rejected that future litigation is a basis to amend a protective order. But I want to go back to the procedural history. We asked three times for the reason for Defendant's redesignation request. If they were concerned about future disputes, why didn't they raise that and say that? If they were concerned about a website, why didn't they say that? They could have, and we asked for it repeatedly. But they refused to do so, and it appears that they were trying to just come in here after the fact and make this claim late. But there would be no need for a future dispute over confidentiality if Defendants complied with their obligations. We -- the certifications we provided were very limited. Lisa signed it. Both the plaintiffs signed it. It said that, I'm the Defendant, or in the plaintiff's case, I'm a plaintiff, I have complied and deleted all the

confidential documents designated by the opposing party. It said, I had complied with my obligations and may not abuse, disclose, or transfer any of the confidential documents or their information, and I understand my obligations survive.

Defendants could not execute that. And that raised a significant question: why, when that is an obligation under the protective order that you do not use, disclose, transfer, communicate the confidential documents, why you cannot declare you actually did comply with that paragraph? And that was when, really, concerns started rising up on plaintiff's end. And when Plaintiffs sent their second letter, after the second demand for redesignation, we asked Defendants to identify the use and disclosure. They also refused to do that. They never said that they didn't use or disclose. They refused to identify any disclosures. So if you don't identify disclosures and you refuse to say that you had complied, it raises even more concerns. And then, Defendants refused to comply, expressly refused to comply, with their obligations. And that's where we are, Your Honor.

Defendants were required to delete and destroy all confidential -- all documents. And I want to make this clear, the protective order says, "all documents

designated by the opposing party as confidential." That includes medical records that the Defendants confused, that were plaintiff's medical records, which plaintiffs designated as confidential. And they did not delete and destroy those within sixty days. They filed some of those with this Court. They then execute a certification saying that they deleted and destroyed confidential documents. They removed the actual chart that plaintiffs provided of the documents they designated as confidential. So we don't know what was designate -- what they alleged to have deleted or destroyed. But then they file additional confidential documents with this Court.

So at this point, we know documents have not been destroyed, and documents have been used in this litigation after the time they were supposed to be destroyed. And they were used in this litigation after Defendants claimed they had deleted and destroyed those documents.

It is appropriate for this Court to order to show -- to issue an order to show cause for Defendants to come into this Court and explain this, and if they have disclosed these documents, used, disclosed, transferred, communicated them, Plaintiffs need to be able to remedy that harm. We don't know what they've done with

Plaintiff's medical records. Have they disclosed them? Have their medical record numbers been issued and released to the public? We don't know. And we can't know that until Defendants come into this Court and show cause.

And I want to note that Defendants' defense to this appears to be, well, we filed a motion with this Court. That doesn't terminate any of their obligations. They did not seek relief from this Court, asking to with -- to retain these documents in the meantime. They did not try to get a motion to be heard before the sixty days. They didn't do anything, and we provided the caselaw that the case terminated at day sixty, on February 26th. Those obligations were due to be complied with by April 27th. That was before they filed their supporting papers with this Court.

Defendant's theory was, well, we just have no enforceable obligation. There's no legal support for that. There is no caselaw providing that a party can file a motion and be relieved of its obligations. That is actually an absurd interpretation, and that is what the courts have found in other cases, and I have this in my memorandums, that when you're trying -- saying that a court order is interpreted in a way that makes it unenforceable, that is not reasonable. And under this

theory, if you file a motion, defendants have no obligation to comply; that is unenforceable. It means that they would never be required to delete and destroy documents because filing a motion for contempt, because they didn't comply, relieves them of all their obligations. That's not reasonable. That is not what the court intended. That is not what the parties intended. Defendants just decided that they didn't wish to be bound.

Now, we've raised this -- the question today, because when you look at everything, it appears that defendants used, disclosed, transferred, or communicated confidential documents. They are seeking relief from this court order and seeking to eliminate their obligations of confidentiality. Why would they need to do that, unless they've already used, disclosed, transferred, or communicated those documents? Because at the end of the day, the fact that they did not, would not, declare under penalty of perjury that they understood their obligations continued through and they remained even after termination of the case, which was in the protective order, the only other reasonable conclusion is that they didn't intend to comply with the protective order at all. And that would be an even bigger issue of this court. Because at that point, they

would have made false representations to plaintiffs, to this Court, and to counsel, which were relied upon by everyone in that protective order.

So today, we ask this Court to issue an order to show cause. And we also ask this Court to order attorney's fees for two bases. One is the fact that under the contempt law, attorneys' fees are recoverable because they are an injury and damage; they're a loss to get a party to comply with a court order. And two, because Defendant's motion is simply frivolous. There's no legal support. There's no factual support. Had they done their research, they would have known there's no subject matter jurisdiction. It is not enforcement. They continue to change their theory in an attempt to make it appear that there's jurisdiction which simply doesn't exist.

So at the end of the day, Your Honor, we ask that you enter an order to show cause, make Defendants show cause if they disclosed documents, to provide relief identifying what's been disclosed, identifying who, so we can take the appropriate remedial measures needed to protect those confidential -- that confidential information contained therein. And deny Defendant's motion and grant Plaintiffs their attorney's fees.

THE COURT: All right. Mr. Tentinger.

MR. TENTINGER: It sounds like we just kind of rolled into the Plaintiff's contempt motion. So, Your Honor, I guess to the extent there's any rebuttal to our motion, I think the legal analysis you were provided at this hearing is flawed. I'll defer to our written submissions.

As far as why these records, well, excuse me. As far as why Defendants want to be able to maintain these records, I'll go back to the HRO. The Plaintiffs used medical records. They removed the confidentiality designation for the purpose of that HRO. Those HRO records are not filed under seal. The medical records still available if Sean wanted to go to the courthouse and get 'em. On top of that, now they're reasserting the confidentiality of those records. They're publishing it on their website, specifically quoting medical records. The Defendants are very concerned that this same stuff is going to come up again, despite rules and caselaw that says it shouldn't, it does seem like these parties will meet again. They want to be able to preserve it.

As far as some of the records, I believe that Plaintiff's counsel touched on, Defendants are of the position that those records are being amendive (sic) -- amended, I think the records themselves show that there's been amendments to those records and changes to those

records. Some of the originals, Defendants are concerned that if they ever needed it again, would not be available to them. Those records, while removing the confidentiality designation, would still be governed by any applicable state or federal regulations. But Defendants are just -- do not want to have to destroy those records and without ever being able to potentially get 'em again. That's where that comes in. For the rest, I'll just defer to the briefing.

As far as the response to the contempt motion goes, I think the timing presented by Plaintiff's counsel is incorrect. The, the -- following judgment, the Plaintiffs would have had -- there would have been opportunity to appeal any of that, or Defendants could have appealed that, there would have been 30 days there and another 60 days then to comply. So Defendants still complied within the requirements of the protective order.

On top of that, the Plaintiffs are seeking a certification that stretches beyond what is explicitly required of clause eleven in the protective order. There's not a chance in the world I'm going to allow my clients to sign anything under oath that's going to go beyond what they're required to do. These additional certifications, whatever Plaintiffs wanted to include, I'm just not going to allow the clients to sign that if

they're not required to do so. I get that Plaintiffs want it, but they don't -- they can bring a motion then to amend the protective order, then to get additional certification requirements. But absent that, I'm going to advise my clients not to sign anything further under oath, and they are absolutely bound to because I think it's just going to subject them to more scrutiny. It's not an admission at all that they violated a protective order; they didn't comply with any of that stuff; they're just not going to provide that certification beyond what is required by the actual order itself. On top of that, the -- the tables that Plaintiffs have attached to that certification that they want signed includes records that are publicly available through other means and are not properly designated confidential. So that table itself brings a problem.

But ultimately, civil contempt is to get parties to comply with a court order. That's already been satisfied. Plain-- Defendants have been provided those certifications as required by Rule 11. They were provided to this Court with my affidavit and response. Civil contempt is not available here because they've already complied. And quite frankly, we're pretty clear that they would -- well, I'll just defer to the rest of the argument -- arguments are in the briefing. I don't

think we need to expand on it any further.

THE COURT: All right. Ms. Wolfgram, any final statement?

MS. WOLFGRAM: I just wanted to bring up one thing, Your Honor. Mr. Tentinger talks about an HRO; those records are not publicly available. That case is not available. As the Court knows, that those cases, records are very limited, and specifically, medical records are never publicly available in those cases. And the protective orders are covering documents that are received through discovery. Plaintiffs obtained their own medical records. Plaintiffs are able to disclose them as they need to. That doesn't provide the other party the right to disclose confidential documents that are Plaintiff's medical records. And if the Court needs that citation, I can find it.

THE COURT: I think I'm good with that. Anything further, ma'am?

MS. WOLFGRAM: No, Your Honor.

THE COURT: All right. The Court will take this matter under advisement, and I will issue an order within the statutory timeframes. So that will conclude our hearing here today. Thank you, everyone.

MR. TENTINGER: Thank you.

(Proceedings concluded.)

MINNESOTA JUDICIAL BRANCH

Filed in District Court
State of Minnesota
6/29/2026 8:20 AM

STATE OF MINNESOTA IN THE DISTRICT COURT

COUNTY OF OTTER TAIL SEVENTH JUDICIAL DISTRICT

- -

Craig Stevenson, Marie Stevenson,

Plaintiffs, File No. 56-CV-20-2928

vs. REPORTER'S CERTIFICATE

Sean Stevenson, Renee Stevenson,

Lisa Stevenson-Allen, Ashley Anderson

- -

I, Dana Eifert, hereby certify that I am an official court reporter in the Seventh Judicial District of the State of Minnesota; that as such reporter I digitally recorded the proceedings in the above-entitled action; that I thereafter transcribed to typewriting the foregoing transcript from the digital recordings taken in Otter Tail County, Minnesota on May 22,2026; and that the foregoing transcript consisting of thirty-one (31) pages, constitutes a full, true, and accurate transcription of said proceeding.

Dated: June 28, 2026

/s/ Dana Eifert
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