

**IN THE DISTRICT COURT OF COMANCHE COUNTY
STATE OF OKLAHOMA**

NEIL WEST AND LACY WEST,

Plaintiffs,

v.

**STATE FARM FIRE AND CASUALTY CO.,
And NANCY HOLCOMB INS. AGENCY,
INC.,**

Defendants.

FILED

DISTRICT COURT
COMANCHE COUNTY, OKLAHOMA
October 13, 2026 12:34 PM
ROBERT MORALES, COURT CLERK
Case Number CJ-2025-135

Case No. CJ-2025-135

The Hon. G. Sheperd

**NONPARTY APPLICANT THE LAWTON CONSTITUTION'S
APPLICATION FOR PERMISSION TO CONDUCT
ELECTRONIC MEDIA COVERAGE OF JURY TRIAL**

COMES NOW The Lawton Constitution ("Applicant"), a nonparty news organization, through undersigned counsel, and requests express permission under Okla. 5th Jud. Dist. Ct. R. 25 to conduct limited photography, audio and video recording, and broadcasting of public portions of the civil jury trial. Applicant understands trial is scheduled for November 9, 2026, subject to the Court's current setting. Applicant proposes the safeguards in Exhibit A and submits a separate proposed order.

BACKGROUND

1. Applicant serves Lawton, Comanche County, and surrounding communities. This civil insurance action presents a matter of local interest concerning insurance practices and the rights and obligations of policyholders and insurers. Applicant does not ask the Court to accept any party's allegations as established facts or to prejudge the merits.

2. Insurance claims and the resolution of disputes between policyholders and insurers are subjects of practical concern to the community Applicant serves. Electronic coverage would

enable readers who cannot attend because of work, distance, or other obligations to see and hear permitted portions of the proceedings. It would supplement written reporting and help the public understand how the Court and jury resolve a civil insurance dispute.

3. Applicant submits that these informational and educational benefits establish a compelling community interest in carefully controlled coverage. The proposed restrictions protect juror privacy and impartiality, avoid disruption, and preserve the Court's complete control.

AUTHORITY AND LIMITED PURPOSE

4. Okla. 5th Jud. Dist. Ct. R. 25 provides:

"Except as expressly permitted by the individual Judge, the use of cameras, audio, or video recording equipment, television broadcasting equipment, cell phones or any other electronic devices inside of courtrooms, conference rooms, annexes, or the Judge's chambers is prohibited."

5. The operative exception permits the individual Judge to authorize otherwise prohibited devices. Rule 25 supplies no express advance-notice deadline, party-consent requirement, equipment limit, or detailed camera protocol. Applicant seeks case-specific permission under that exception and offers Exhibit A as proposed conditions, rather than as requirements appearing in the rule.

6. In a criminal proceeding, the Oklahoma Court of Criminal Appeals recognized trial-judge discretion over electronic coverage subject to safeguards preserving courtroom dignity and the administration of justice. *Lyles v. State*, 1958 OK CR 79, ¶ 14, 330 P.2d 734. Applicant cites *Lyles* by analogy for judicial control and safeguards, not as a holding governing civil litigant.

7. The United States Supreme Court likewise rejected a categorical constitutional ban on electronic coverage in the criminal-trial context. *Chandler v. Fla.*, 449 U.S. 560, 573–75 (1981).

Applicant relies on that limited proposition, not on an affirmative constitutional right to record this civil trial.

8. Applicant seeks the Court's discretionary permission under Rule 25 to record, rather than the open-courts and press-freedom principles reflected in Okla. Const. art. II, §§ 6, 22.

PROTOCOL NOTICE AND PRETRIAL COORDINATION

9. Exhibit A proposes limits on equipment and personnel, Court-approved audio, no voir dire coverage or juror identification, protection of confidential communications, witness-specific restrictions, pooling, and immediate suspension. Jury deliberations and voting are excluded in all circumstances under Okla. Stat. tit. 21, § 588. Applicant also agrees to stop recording and step outside the courtroom whenever directed.

10. Applicant submits this request for consideration on notice to all counsel of record, with service to be documented in the certificate below. Applicant does not represent that any party has consented or that no party objects. Applicant requests that counsel have an opportunity to present objections before the Court rules and is willing to participate in a brief pretrial conference to address objections and finalize logistics.

11. Applicant respectfully requests a ruling sufficiently before trial to permit coordination with the bailiff or designated court personnel and any pooling participants. Before operating equipment, Applicant will obtain approval of its equipment, operators, placement, and audio arrangement. All coverage shall remain subject to the Court's immediate and continuing authority to modify, suspend, or terminate permission.

REQUEST FOR RELIEF

WHEREFORE, Applicant respectfully requests that the Court grant limited electronic media coverage of permitted public portions of the civil jury trial; approve Exhibit A subject to

any modifications the Court requires; allow pretrial coordination with designated court personnel; and rule sufficiently in advance of trial to implement the approved arrangements. Applicant tenders a separate proposed order for the Court's consideration.

Respectfully submitted,

A handwritten signature in black ink, reading "Jennifer E. Jackson". The signature is fluid and cursive, with the first name "Jennifer" and last name "Jackson" clearly legible.

Lysbeth George, OBA #30562

Jennifer E. Jackson, OBA #19492

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ATTORNEYS FOR

NON-PARTY APPLICANT

THE LAWTON CONSTITUTION

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on this 13th day of October, 2026, the above and forgoing document was sent via first class U.S. Mail, postage prepaid, to:

Reggie Whitten, OBA #9576
Whitten Burrage
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-and-

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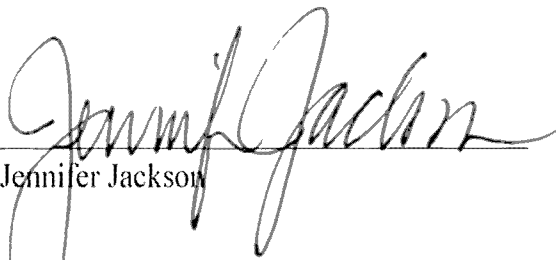

Jennifer Jackson

EXHIBIT A
PROPOSED ELECTRONIC MEDIA COVERAGE PROTOCOL

1. Scope of coverage. Coverage is limited to public portions of the civil jury trial that the Court permits, including opening statements, witness testimony, closing arguments, and the announcement of the verdict. Still photography, video and audio recording, and broadcasting remain subject to every restriction below and any further direction of the Court.
2. Equipment and personnel. Applicant proposes a maximum of one still camera, one fixed video camera on a tripod, and two designated media representatives. Before use, Applicant shall identify the equipment and operators to designated court personnel and obtain approval of their placement and operation. No flash, artificial lighting, audible equipment signals, or movement of equipment during proceedings is permitted. Setup, testing, and removal shall occur only at times approved by court personnel. Audio shall be obtained only through a Court-approved feed or recording arrangement.
- 3. Jurors and jury selection. No photography, audio or video recording, or broadcast of jurors or prospective jurors is permitted. There shall be no electronic media coverage of voir dire. Cameras and microphones shall be positioned to avoid juror images, names, and identifying information. No attempt shall be made by any means to observe, listen to, or record jury deliberations or voting. Okla. Stat. tit. 21, § 588.**
4. Restricted matters. No recording or broadcasting is permitted during bench conferences, sidebars, in-chambers proceedings, private attorney-client communications, closed proceedings, or matters the Court excludes from coverage. Recording shall stop during recesses unless the Court expressly permits it. Private sidebar or other excluded audio inadvertently captured shall not be published or disseminated.
5. Witnesses and parties. Applicant shall comply with any restriction the Court imposes concerning a witness, party, or portion of testimony, including restrictions entered in response to an objection. The Court may direct that coverage stop for any particular testimony or confidential matter.
6. Conduct and pooling. Media representatives shall remain in approved locations, avoid obstructing views or interfering with testimony, and comply with court personnel's directions. If additional media organizations seek coverage, Applicant shall cooperate with any pooling arrangement the Court requires. Additional equipment or operators require express approval.
7. Immediate suspension and removal. The Court may suspend, restrict, or terminate coverage immediately, with or without prior notice. Applicant shall stop recording immediately when directed, remain stopped until expressly authorized to resume, and leave the courtroom or remove equipment when directed. Permission remains subject to modification or withdrawal throughout trial.