

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

NATIONAL VETERANS LEGAL
SERVICES PROGRAM, NATIONAL
CONSUMER LAW CENTER, and
ALLIANCE FOR JUSTICE, for themselves
and all others similarly situated,

Plaintiffs,

v.

UNITED STATES OF AMERICA,
Defendant.

Civil Action No. 16-745 ESH

CONSENT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

The parties have conferred, and believe that a Protective Order is necessary to protect the privacy of PACER account holders, whose information must be provided to the class administrator for purposes of providing notice to the class. Protection of class member data constitutes sufficient good cause to justify limiting the use of information obtained for purposes of providing class notice, and to justify the entry of a protective order. Fed. R. Civ. P. 26(c); *Aguirre v. Shapiro*, 263 F.R.D. 26, 29 (D.D.C. 2009).

The parties have agreed on the attached Stipulated Protective Order to apply to the production of class member data for purposes of class notice, and Defendant has consented to the filing of this Motion. Therefore, Plaintiffs respectfully request that the Court grant the Consent Motion and enter the attached Stipulated Protective Order.

By: /s/ William H. Narwold
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*Counsel for Plaintiffs and the
Class*

CERTIFICATE OF SERVICE

I, William H. Narwold, declare that I am over the age of eighteen (18) and not a party to the entitled action. I am a principal of the law firm MOTLEY RICE LLC, and my office is located at One Corporate Center, 20 Church Street, 17th Floor, Hartford, CT 06103.

On March 31, 2017, I caused to be filed the following in the above-captioned case:

Consent Motion For Entry Of Stipulated Protective Order

with the Clerk of Court using the Official Court Electronic Document Filing System, which served copies on all interested parties registered for electronic filing.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 31, 2017

Respectfully submitted,

By: /s/ William H. Narwold
William H. Narwold
MOTLEY RICE LLC