

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

JANE DOE 1 *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP *et al.*,

Defendants.

Civil Action No. 17-cv-1597 (CKK)

**PROTECTIVE ORDER**

Upon the request of the parties in the above-captioned matter, and pursuant to Federal Rule of Civil Procedure 26(c), the Court hereby enters the following protective order to provide a mechanism for those plaintiffs who are proceeding in this action through pseudonyms (collectively “the Pseudonym Plaintiffs”) to provide their identities to defendants.

1. Provision of the Pseudonym Plaintiffs’ Identities and Under Seal Filings to Defendants. Upon entry of this protective order, plaintiffs, through their counsel, will provide the identities and addresses of the Pseudonym Plaintiffs along with documents that have been filed under seal in this matter to undersigned defense counsel of record.

2. Limited Dissemination of the Pseudonym Plaintiffs’ Identities. The following persons may receive notice of the Pseudonym Plaintiffs’ identities: (a) counsel for defendants, including supervisory officials at the Department of Justice and agency counsel for defendants; (b) persons regularly in the employ of counsel for defendants who have a need to know the Pseudonym Plaintiffs’ identities in the performance of their duties related to this action; (c) persons regularly in the employ of defendants who have a need to know the Pseudonym Plaintiffs’ identities in the performance of their duties in conjunction with this action, provided that such

(N)

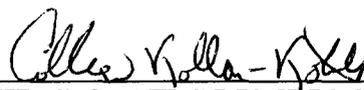
persons agree to and sign the attached undertaking (Appendix A); and (d) potential witnesses for this action, provided that such persons agree to and sign the attached undertaking (Appendix A). Counsel for defendants shall maintain copies of all signed undertakings.

3. Permissible Uses of the Pseudonym Plaintiffs' Identities. Any person learning the Pseudonym Plaintiffs' identities pursuant to this Protective Order ("Recipient") shall use that information only for purposes of this litigation and shall not disclose the Pseudonym Plaintiffs' identities to anyone except persons identified in Paragraph 2, absent court order.

4. Scope of the Protective Order. This protective order does not alter the requirements of District of Columbia Civil Rule 5.1(h), which requires an order of the Court permitting documents to be filed under seal. If any party wishes to use any document containing the Pseudonym Plaintiffs' identities, or other personally identifying information that would lead to the discovery of the Pseudonym Plaintiffs' identities, in a court filing or proceeding in this action, they shall either (i) redact the Pseudonym Plaintiffs' names and other personally identifying information or (ii) shall file a motion to seal pursuant to District of Columbia Civil Rule 5.1(h).

5. Modifications. Each party reserves the right to seek to modify the terms of this protective order and Plaintiffs' pseudonym status at any time. Before doing so, however, the counsel for the party seeking to modify this protective order shall confer with counsel for all other parties to this action.

IT SO ORDERED, this 13<sup>th</sup> day of September, 2017.

  
\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

APPENDIX A

ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND

I, \_\_\_\_\_ [print or type full name], declare under penalty of perjury that I have read in its entirety and understand the Stipulated Protective Order that was issued by the United States District Court for the District of Columbia on [date] in *Doe v. Trump*, No. 17 Civ. 1597 (CKK). I agree to comply with and to be bound by all the terms of this Stipulated Protective Order and I understand and acknowledge that failure to so comply could expose me to sanctions and punishment in the nature of contempt. I solemnly promise that I will not disclose in any manner any information or item that is subject to this Stipulated Protective Order to any person or entity except in strict compliance with the provisions of this Order.

I further agree to submit to the jurisdiction of the United States District Court for the District of Columbia for the purpose of enforcing the terms of this Stipulated Protective Order, even if such enforcement proceedings occur after termination of this action.

Date: \_\_\_\_\_

City and State where sworn and signed: \_\_\_\_\_

Printed name: \_\_\_\_\_  
[printed name]

Signature: \_\_\_\_\_  
[signature]