

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

RICHARD ROE, ET AL.,

Plaintiffs,

v.

PATRICK M. SHANAHAN, ET AL.,

Defendants.

CIVIL ACTION NO. 1:18-cv-01565

**PLAINTIFFS' MOTION FOR ENTRY OF AGREED-UPON PROTECTIVE ORDER
AND AGREED-UPON ELECTRONICALLY-STORED INFORMATION ORDER**

Plaintiffs Richard Roe, Victor Voe, and OutServe-SLDN, Inc. ("Plaintiffs"), by counsel, hereby move for entry of an agreed protective order and for entry of an ESI order identical to the ESI order entered in *Harrison*, No. 1:18-cv-00641-LMB-IDD, Dkt. 70 (Nov. 30, 2018), as set forth in the parties' Memorandum in Support of the Parties' Joint Motion To Modify the Scheduling Order in the *Harrison* Case and for Entry of Briefing Schedule and Scheduling Order in the *Roe* Case. ECF No. 30 ¶ 5.e.

There is good cause for entry of these proposed orders because disclosure and discovery activity in this action will involve the production of confidential and/or private information for which special protection from public disclosure and from use for any other purpose than litigating this action will be warranted. The parties have agreed to the Proposed Protective Order attached to this Motion as Exhibit A. In addition, the parties have agreed to a stipulated order regarding ESI to facilitate discovery in this action, attached to this Motion as Exhibit B.

Plaintiffs therefore respectfully request that the Court enter the Proposed Protective Order, attached as Exhibit A, and the Proposed Electronically Stored Information Order, attached as Exhibit B.

Dated: January 18, 2019

Respectfully Submitted

Scott Schoettes*
SSchoettes@lambdalegal.org
Kara Ingelhart*
KIngelhart@lambdalegal.org
LAMBDA LEGAL DEFENSE AND EDUCATION
FUND, INC.
105 W. Adams St., Suite 2600
Chicago, IL 60603
T: (312) 663-4413

Peter E. Perkowski*
PeterP@outserve.org
OUTSERVE-SLDN, INC.
P.O. Box 65301
Washington, DC 20035-5301
T: (800) 538-7418

Attorneys for Plaintiffs
**pro hac vice*

/s/ Andrew R. Sommer
Andrew R. Sommer
Virginia State Bar No. 70304
ASommer@winston.com
Lauren Gailey*
LGailey@winston.com
Laura Cooley
Virginia State Bar No. 93446
LCooley@winston.com
WINSTON & STRAWN LLP
1700 K St., NW
Washington, DC 20006
T: (202) 282-5000

Julie A. Bauer*
JBauer@winston.com
WINSTON & STRAWN LLP
35 W. Wacker Dr.
Chicago, IL 60601
T: (312) 558-560

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of January, 2019, I caused the foregoing to be filed electronically using the Court's CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

Dated: January 18, 2019

Respectfully submitted,

/s/ Andrew R. Sommer
Andrew R. Sommer