

**UNITED STATES DISTRICT COURT
DISTRICT FOR THE MIDDLE DISTRICT OF TENNESSEE**

KAYLA GORE; JASON SCOTT; L.G.; and
K.N.,

Plaintiffs,

v.

WILLIAM BYRON LEE, in his official
capacity as Governor of the State of
Tennessee; and LISA PIERCEY, in her
official capacity as Commissioner of the
Tennessee Department of Health,

Defendants.

Civil Action No. 3:19-cv-328

Jury Trial Demanded

**PLAINTIFF K.N.'S MOTION FOR LEAVE TO PROCEED PSEUDONYMOUSLY
AND FOR A PROTECTIVE ORDER**

Plaintiff K.N., by and through her undersigned counsel, respectfully moves this Court for leave to proceed pseudonymously and for a protective order, in order to protect her identity from public disclosure.

For the reasons explained in Plaintiff's concurrently filed Memorandum of Law in support of this Motion, Plaintiff respectfully requests that the Court enter an order (1) granting her leave to proceed pseudonymously and (2) protecting her identity from public disclosure. Plaintiff further requests such other and further relief to which she may be justly entitled.

In accordance to paragraph 5.08 of the Court's Administrative Practices and Procedures for Electronic Case Filing, a proposed order is attached hereto.

Dated: April 24, 2019

Respectfully submitted,

s/John T. Winemiller

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* Application for admission *pro hac vice*
forthcoming.

CERTIFICATE OF SERVICE

I hereby certify that on April 24, 2019 I filed the foregoing *Plaintiff K.N.'s Motion for Leave to Proceed Pseudonymously and for a Protective Order* electronically through the Court's CM/ECF system. Parties may access this filing through the Court's system. In addition, a process server will serve via hand-delivery a copy of this document on the defendants, William Byron Lee and Lee Piercey, along with the Summons and Complaint.

s/ John T. Winemiller

John T. Winemiller