

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DARCY CORBITT, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	CASE NO. 2:18-cv-91-MHT-GMB
)	
HAL TAYLOR, <i>et al.</i> ,)	
)	
Defendants.)	

RESPONSE TO SHOW CAUSE ORDER

Defendants file this response to the Court’s July 24, 2018 Order to Show Cause why plaintiff Jane Doe’s Motion for Leave to Proceed Under a Pseudonym and for a Protective Order should not be granted. (Doc. 37). Defendants do not oppose the entry of an order allowing plaintiff Jane Doe to proceed anonymously and requiring any document containing Jane Doe’s actual name to be filed under seal. The Protective Order governing discovery materials in this case includes “any document containing plaintiff John Doe’s actual name” in the definition of “Confidential Information” protected by the order. (Doc. 33 § 2(a)(6)). The parties have already agreed that this provision of the Protective Order will apply to any documents produced in discovery containing the actual name of the substituted plaintiff, Jane Doe.

While defendants do not oppose the entry of an order protecting from disclosure Jane Doe’s identity, they do not thereby concede the factual assertions made in support of her motion and otherwise reserve the right to seek discovery to test the validity of her claims.

Respectfully submitted,

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Attorney General

s/ Brad A. Chynoweth

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CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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