

**IN THE UNITED STATES DISTRICT COURT**  
**MIDDLE DISTRICT OF TENNESSEE**  
**NASHVILLE DIVISION**

*Alistair E. Newbern*  
Alistair E. Newbern  
U.S. Magistrate Judge

**L.E., by his next friend and parents,** )  
**SHELLEY ESQUIVEL and** )  
**MARIO ESQUIVEL,** )  
 )  
**Plaintiff,** )  
 )  
**v.** )  
 )  
**BILL LEE, in his official capacity as** )  
**Governor of Tennessee, et al.** )  
 )  
**Defendants.** )

**No. 3:21-cv-00835**  
**Chief Judge Crenshaw**  
**Magistrate Judge Newbern**

**JOINT MOTION FOR PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff and Defendants hereby jointly move this Court to enter the proposed and agreed upon Protective Order, attached as Exhibit A. In support of this Motion, the Parties state as follows:

1. This Court has broad authority to regulate discovery and to enter in protective orders pursuant to Federal Rule of Civil Procedure 26.
2. The Parties agree that discovery in this matter will involve the disclosure or production of certain documents, things, and information, by one or more parties, that constitute or contain confidential information, trade secrets, or other priority information within the meaning of Rule 26(c) of the Federal Rules of Civil Procedure, and which should be protected by way of an appropriate protective order.
3. The Parties desire to prevent unnecessary dissemination or disclosure of the confidential information.
4. Based upon the foregoing, the Parties agree to abide by the provisions and protections forth in the

proposed Protective Order attached as Exhibit A.

WHEREFORE, the Parties respectfully request this Court to grant their Motion and enter the proposed Protective Order attached as Exhibit A.

Dated: May 10, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 10, 2022, a true and correct copy of the foregoing Joint Motion for Protective Order was served on counsel for all Defendants via the Court's ECF/CM system.

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