

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA**

JOHN DOE, an individual,)	
Plaintiff,)	
)	
v.)	
)	CASE NO. CV-07-P-0842-S
The UNITED STATES AIR FORCE, a)	
government agency d/b/a USAF XOI-RE, or)	
d/b/a The AIR INTELLIGENCE AGENCY,)	
a/k/a A.I.A.; et al)	
)	

PLAINTIFF’S RESPONSE TO COURT’S SHOW CAUSE ORDER

Comes now the Plaintiff, John Doe by and through his attorney of record, James R. Bosarge, Jr. and would respond to the Show Cause Order issued by this Honorable Court on July 18, 2007 and prays that this Honorable Court will allow continuance of the use of “John Doe” and shows the following for the relief herein requested:

1. That the Plaintiff desires for anonymity due to the area of his expertise in the intelligence field places him in an greatly increased possibility of danger from sources known and unknown.
2. That the Plaintiff desires to remain anonymous and therefore not being placed in the public eye as a possible terrorist target due to the information he uncovered and delivered to the United States Government during his term of duty as an intelligence agent for the armed services.
3. That the Plaintiff contends that information he uncovered during his term of duty, has in the past and could in the future, be of value to foreign governments and terrorists organizations alike.

4. Placing the Plaintiff in harms way would not be beneficial to him as an individual, to the United States Government or Homeland Security and furthermore the Plaintiff feels that if his anonymity does not continue then he would be placed in very precarious situations.
5. The Plaintiff does not desire to spend the rest of his life having to “look over his shoulder” to protect both home and life.
6. The Plaintiff’s Complaint filed May 7, 2007 stated that one reason the Plaintiff wished to remain anonymous was that he feared “that if his identity is disclosed at this point in time, harassment by the news media, and other individuals not involved in this case would become uncontrollable”. The Plaintiff desires to maintain this request to this Honorable Court.
7. That there have been several news media contacts with the Plaintiff’s legal counsel since the filing of the Complaint with legal counsel refusing to reveal the identity of John Doe.
8. That the Plaintiff contends that as a member of “intelligence of the armed services, revealing his true identity would put the U S Air Force in the position of fiercely defending their position in open court.
9. That the Plaintiff contends that revealing his true identity at this time would hinder any possibility of settlement negotiations with the Defendants named in the Complaint.

10. By protecting the identity of the Plaintiff, this Honorable Court will be encouraging a settlement of this matter in lieu of a trial since it is anticipated that the Defendants would prefer that there be no communication between the Plaintiff and any news media outlets concerning his knowledge of matters at hand.
11. The Plaintiff contends that allowing him to remain John Doe at this present time and thereby encouraging settlement versus trial is a key factor due to the Defendants desire to keep "intelligence information" out of the public eye and out of the public court records.
12. The Plaintiff contends that his substantial privacy right is not the redeeming issue in his request for anonymity, rather it is designed to help both parties meet and agree in private to a resolution to the Plaintiff's Complaints and demands.
13. The Plaintiff contends that he does not desire to be a burden to the American court system and therefore if a settlement can be reached by maintaining his anonymity then allowing him to remain John Doe is in the best interest of all parties concerned, not just the Plaintiff.
14. The Plaintiff feels and contends that if there is no immediate settlement of this matter prior to this case being set for trial, then if the court so desires it may order his identity known to the public and thereby allowing the American public a chance to express their opinion of matters to be discussed and decided by a court of law.

**ORAL ARGUMENT REQUESTED, IF DEEMED NECESSARY BY THIS
HONORABLE COURT**

Respectfully submitted,

s/s
James R. Bosarge, Jr., Esquire
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing, Response to Show Cause Order by placing a same in the U S mail, postage prepaid, on this the 23rd day of July, 2007.

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s/s
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