

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
TEXARKANA DIVISION

JOHN WARD, JR.

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C.A. NO. 08-4022  
JURY TRIAL DEMANDED

v.

CISCO SYSTEMS, INC.

**DEFENDANT CISCO SYSTEMS, INC.’S MOTION FOR  
ENTRY OF PROTECTIVE ORDER**

TO THE HONORABLE COURT:

Defendant Cisco Systems, Inc. (“Cisco”) files this Motion for Entry of Protective Order and would show the Court as follows.

Pursuant to the Parties’ Rule 26(f) agreement, the parties agreed to meet and confer concerning a Protective Order, and in the event an agreement was not reached, to file a proposed Protective Order with the Court. The parties have not reached an agreement, thus necessitating this filing.

Because neither party has seen document requests to see what types of information will be requested, it may be more appropriate to revisit the issue in 45 to 60 days when the parties have had a chance to see what kinds of documents will be at issue.

In the alternative, if the Court decides to enter a protective order at this time, Cisco requests that the attached Protective Order be entered, which is substantially the same Protective Order as the order entered by Judge Schneider in the *Eric Albritton v. Cisco Systems, Inc., et al.* matter (Civil Action No. 6:08-cv-00089, In the United States District Court for the Eastern District of Texas, Tyler Division).

If the Plaintiff proceeds with his version of the protective order, Cisco requests the opportunity to oppose the proposed order.

For these reasons, Cisco requests that the Court either revisit the issue of the Protective Order in 45 to 60 days or enter the attached Protective Order.

Respectfully submitted,

JACKSON WALKER L.L.P.

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ATTORNEYS FOR DEFENDANT  
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**CERTIFICATE OF SERVICE**

This is to certify that on this 5<sup>th</sup> day of December, 2008, a true and correct copy of the foregoing was served upon via electronic service:

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