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11 **Pro Hac Vice Application Pending*
 12 *** Designated Counsel for Service*

13 **United States District Court**
 14 **Eastern District of California**
 15 **Sacramento Division**

<p>16 ProtectMarriage.com, et al., 17 18 <i>Plaintiffs,</i> 19 <i>v.</i> 20 Debra Bowen, et al., 21 <i>Defendants.</i></p>	<p>Case No. 2:09-CV-00058-MCE-DAD</p> <p>NOTICE OF MOTION AND PLAINTIFFS' MOTION FOR PROTECTIVE ORDER AND LEAVE TO FILE DOCUMENTS UNDER SEAL</p> <p>Date: TBD Time: TBD Honorable Morrison C. England, Jr.</p>
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 27 **Notice of Motion and Plaintiffs'**
 28 **Motion for Protective Order and**
Leave to File Documents Under Seal

1 TO DEFENDANTS AND THEIR ATTORNEY OF RECORD:

2 YOU ARE HEREBY GIVEN NOTICE THAT on A DATE TO BE DETERMINED BY
3 COURT ORDER, before the Honorable Morrison C. England, Jr. in Courtroom TO BE
4 DETERMINED BY COURT ORDER of the United States District Court for the Eastern District
5 of California, Sacramento Division, located at 501 I Street, Sacramento California 95814,
6 Plaintiff ProtectMarriage.com - Yes on 8, a Project of California Renewal
7 (“ProtectMarriage.com”), National Organization for Marriage California - Yes on 8, Sponsored
8 by National Organization for Marriage (“NOM-California”), and Plaintiff John Doe #1, an
9 individual, and as a representative of the Class of Major Donors, will and hereby do move for a
10 protective order and for leave to file documents under seal.

11 This motion for protective order and for leave to file documents under seal is made
12 pursuant to Fed. R. Civ. P. 5.2(e) and Local Rules 39-140 and 39-141, and on the grounds
13 specified in this notice of motion and motion, Plaintiffs’ Memorandum in Support of Motion for
14 Protective Order and For Leave to File Documents Under Seal, the declarations filed in support
15 Plaintiffs’ Motion for Preliminary Injunction, the Complaint, and such other and further evidence
16 as may be presented to the Court at the time of the hearing.

17 Plaintiffs ProtectMarriage.com, NOM-California, and the Class of Major Donors
18 respectfully move this Court for an Order:

- 19 (1) Granting Plaintiffs ProtectMarriage.com, NOM-California, and the Class of
20 Major Donors leave to file any declaration under seal of any individual or
21 organization that supported Proposition 8 or that is a member of or donor to
22 ProtectMarriage.com or NOM-California;

1 **PROOF OF SERVICE**

2 I, Timothy D. Chandler, am over the age of 18 years and not a party to the within action. My
3 business address is 101 Parkshore Drive, Suite 100; Folsom, California 95630.

4 On January 9, 2009, I electronically filed the foregoing document described as Notice of
5 Motion and Plaintiffs' Motion for Protective Order and Leave to File Documents Under Seal, which
6 will be served on all Defendants along with the Summons and Amended Complaint.

7 I declare under penalty of perjury under the laws of the State of California that the above is true
8 and correct. Executed on January 9, 2009 at Folsom, California.

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10 s/Timothy D. Chandler
11 Timothy D. Chandler (CA Bar No. 234325)
12 Attorney for Plaintiff
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