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12 [see next page for additional counsel for Plaintiffs]

13 Attorneys for Plaintiff(s)  
14 VETERANS FOR COMMON SENSE and  
VETERANS UNITED FOR TRUTH, INC.

15  
16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

19 VETERANS FOR COMMON SENSE and  
VETERANS UNITED FOR TRUTH, INC.,

20 Plaintiffs,

21 v.

22 GORDON H. MANSFIELD, Acting Secretary of  
23 Veterans Affairs, *et al.*,

24 Defendants.

Case No. C-07-3758-SC

**CLASS ACTION**

**PLAINTIFFS' AMENDED NOTICE OF  
MOTION AND MOTION FOR  
PROTECTIVE ORDER RESTRICTING  
DISCLOSURE OF CONFIDENTIAL  
AND PRIVATE INFORMATION AND  
PROHIBITING RETALIATION**

Original Date: January 4, 2008  
Amended Date: January 11, 2008  
Time: 10:00 a.m.  
Place: Courtroom 1, 17th Floor  
Judge: Hon. Samuel Conti  
Complaint Filed: July 23, 2007

1 **ADDITIONAL COUNSEL FOR PLAINTIFFS:**

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1 **AMENDED NOTICE OF MOTION AND MOTION**

2 TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE that on January 11, 2008, at 10:00 a.m., or as soon thereafter as the  
4 matter may be heard, in the Courtroom of the Honorable Samuel Conti, United States District Court,  
5 Northern District of California, San Francisco Division, Courtroom 1, 17th Floor, 450 Golden Gate  
6 Ave., San Francisco, California 94102, Plaintiffs VETERANS FOR COMMON SENSE and  
7 VETERANS UNITED FOR TRUTH, INC. will, and hereby do, move the Court for a protective  
8 order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure restricting the disclosure of  
9 confidential and private information and prohibiting retaliation.

10 This Motion is based on this Notice of Motion, the Memorandum in support hereof, the  
11 Declarations of Gordon P. Erspamer, Heather A. Moser, Paul J. Taira, and Philip E. Cushman, the  
12 pleadings and other files herein, and such other written and oral argument as may be presented to the  
13 Court. A proposed protected order has been submitted to the Court.

14 Dated: December 3, 2007

GORDON P. ERSPAMER  
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HEATHER A. MOSER  
BILL D. JANICKI  
STACEY M. SPRENKEL  
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19 By: /s/ Paul J. Taira

Paul J. Taira

Attorneys for Plaintiffs