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 16 and PROTECTMARRIAGE.COM – YES ON 8, A
 PROJECT OF CALIFORNIA RENEWAL

17 * Admitted *pro hac vice*

18 **UNITED STATES DISTRICT COURT**
 19 **NORTHERN DISTRICT OF CALIFORNIA**

20 KRISTIN M. PERRY, SANDRA B. STIER, PAUL
 21 T. KATAMI, and JEFFREY J. ZARRILLO,

22 Plaintiffs,

23 CITY AND COUNTY OF SAN FRANCISCO,

24 Plaintiff-Intervenor,

25 v.

26 ARNOLD SCHWARZENEGGER, in his official
 27 capacity as Governor of California; EDMUND G.
 BROWN, JR., in his official capacity as Attorney
 28 General of California; MARK B. HORTON, in his

CASE NO. 09-CV-2292 VRW

**DEFENDANT-INTERVENORS
 DENNIS HOLLINGSWORTH, GAIL
 J. KNIGHT, MARTIN F. GUTIERREZ,
 MARK A. JANSSON,
 AND PROTECTMARRIAGE.COM'S
 MOTION FOR ADMINISTRATIVE
 RELIEF**

1 official capacity as Director of the California
2 Department of Public Health and State Registrar of
3 Vital Statistics; LINETTE SCOTT, in her official
4 capacity as Deputy Director of Health Information
5 & Strategic Planning for the California Department
6 of Public Health; PATRICK O'CONNELL, in his
7 official capacity as Clerk-Recorder for the County
8 of Alameda; and DEAN C. LOGAN, in his official
9 capacity as Registrar-Recorder/County Clerk for
10 the County of Los Angeles,

11
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13 Defendants,

14 and

15 PROPOSITION 8 OFFICIAL PROPONENTS
16 DENNIS HOLLINGSWORTH, GAIL J.
17 KNIGHT, MARTIN F. GUTIERREZ, HAK-
18 SHING WILLIAM TAM, and MARK A.
19 JANSSON; and PROTECTMARRIAGE.COM –
20 YES ON 8, A PROJECT OF CALIFORNIA
21 RENEWAL,

22
23 Defendant-Intervenors.
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Additional Counsel for Defendant-Intervenors

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1 disseminating copies of the trial video to Plaintiffs and Plaintiff-Intervenor—potential use at
2 closing argument—has been satisfied. There is simply no legitimate justification for permitting
3 Plaintiffs and Plaintiff-Intervenor to maintain possession of copies of the trial video.

4 What is more, in issuing its stay order, the Supreme Court held that “irreparable harm”
5 would “likely result” from public broadcast of the trial. *Hollingsworth*, 130 S. Ct. at 712. The risk
6 of such harm, of course, does not depend on the means by which a trial recording is made public.
7 And even with this Court’s requirement that all copies of the trial video be “maintain[ed] as strictly
8 confidential,” Doc #672 at 2, it cannot be denied that dissemination beyond the confines of the
9 Court has increased the possibility of accidental public disclosure. In light of this possibility, we
10 respectfully submit that there is no justification for this Court to permit Plaintiffs and Plaintiff-
11 Intervenor to maintain copies of the trial recording.

12 **CONCLUSION**

13 For these reasons, Proponents request an order directing Plaintiffs and Plaintiff-Intervenor
14 to return to the Court immediately all copies of the trial video in their possession.

15
16 Dated: June 29, 2010

17 COOPER AND KIRK, PLLC
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20 MARTIN F. GUTIERREZ, MARK A. JANSSON, AND
PROTECTMARRIAGE.COM – YES ON 8, A PROJECT
OF CALIFORNIA RENEWAL

21 By: /s/Charles J. Cooper
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