

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT**

---

STEPHANIE BIEDIGER, *et al.*, )  
 individually and on behalf of all )  
 those similarly situated; and )  
 ROBIN LAMOTT SPARKS, individually, )  
 )  
 v. )  
 )  
 QUINNIPIAC UNIVERSITY )  


---

Case No. 3:09-CV-621(SRU)

MAY 25, 2010

**JOINT MOTION FOR ORDER APPROVING STIPULATED PROTECTIVE ORDER**

The Plaintiffs and the Defendant hereby move jointly for an Order of the Court approving the attached Stipulated Protective Order in this matter.

The parties to this case recognize that information disclosed in the course of discovery by plaintiffs and defendant may include personal information of the named plaintiffs, members of the class, students at Quinnipiac University, and/or prospective witnesses, which is protected by the Family Educational Rights and Privacy Act ("FERPA") or which one or more of the parties believes should be kept confidential, and/or may include nonpublic information of students and/or employees of the University. The parties seek to maintain the confidentiality of this information and to obtain an order that will allow for the disclosure of FERPA protected information that is needed for trial.

WHEREFORE, the parties request that this motion be granted.

Respectfully submitted,

THE PLAINTIFFS

/s/ Jonathan B. Orleans  
Jonathan B. Orleans (ct05440)  
Alex V. Hernandez (ct08345)  
Pullman & Comley  
850 Main Street  
Bridgeport, CT 06601  
(203) 330-2129 (phone)  
(203) 576-8888 (fax)  
[jorleans@pullcom.com](mailto:JORLEANS@PULLCOM.COM)  
[ahernandez@pullcom.com](mailto:AHERNANDEZ@PULLCOM.COM)

Kristen Galles  
Equity Legal  
10 Rosecrest Avenue  
Alexandria, VA 22301  
(703) 683-4491 (phone)  
(703) 683-4636 (fax)  
[kgalles@comcast.net](mailto:KGALLES@COMCAST.NET)

David McGuire (ct27523)  
ACLU Foundation of Connecticut  
2074 Park Street, Suite L  
Hartford, CT 06106  
(860) 523-9146 (phone)  
(860) 586-8900 (fax)  
[dmcguire@acluct.org](mailto:DMCGUIRE@ACLUCT.ORG)

Their Attorneys

THE DEFENDANT

/s/ Susan Friedfel  
Susan Friedfel (phv 015747)  
Edward A. Brill (phv 03585)  
Proskauer Rose LLP  
1585 Broadway  
New York, NY 10036-8299  
Ph. (212) 969-3384  
Fax (212) 969-2900  
[sfriedfel@proskauer.com](mailto:SFRIEDFEL@PROSKAUER.COM)  
[ebrill@proskauer.com](mailto:EBRILL@PROSKAUER.COM)

Mary A. Gambardella (ct05386)  
Jonathan M. Bardavid  
Wiggin & Dana, LLP  
400 Atlantic Street  
P.O. Box 110325  
Stamford, CT 06911-0325  
(203) 363-7600 (phone)  
(203) 363-7676 (fax)  
[mgambardella@wiggin.com](mailto:MGAMBARDELLA@WIGGIN.COM)  
[jbardavid@wiggin.com](mailto:JBARDAVID@WIGGIN.COM)

Its Attorneys

**CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2010, a copy of foregoing *JOINT MOTION FOR ORDER APPROVING STIPULATED PROTECTIVE ORDER* was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

Dated: May 25, 2010

/s/ Susan D. Friedfel  
\_\_\_\_\_  
Susan D. Friedfel