

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL NEWDOW, *et al.*,

Plaintiffs,

v.

HON. JOHN ROBERTS, JR., *et al.*,

Defendants.

Civil Action No. 1:08-cv-02248-RBW

PLAINTIFFS' ASSENTED-TO MOTION TO SUBMIT CHILD-RELATED
ADDRESSES (IN THE FIRST AMENDED COMPLAINT) UNDER SEAL

MICHAEL NEWDOW
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In documents being filed concurrently with this document, Plaintiffs are seeking leave to file an Amended Complaint. Approximately 230 additional individuals are joining the original plaintiffs in the Amended Complaint. Of these, approximately forty are either minor children themselves, or are adults who currently are (or expect to be) parents with minor children during the pendency of this litigation. Because such minor children may be at risk of injury due to their participation in what is, for some, a very unpopular quest, Plaintiffs are herein seeking permission to submit their names and addresses (and/or those of their parents) under seal. Accompanying this Motion is a proposed Order.

Because the pertinent arguments have already been presented to the Court in an earlier Motion for a Protective Order, Documents #30, and the Court has considered and ruled on that Motion, Document #36, a Memorandum in Support of this Motion is assumed to be unnecessary. (Plaintiffs will gladly provide such a memorandum, however, should the Court so prefer.)

Pursuant to LCvR 7(k) and (m):

- (a) Consultation was obtained with Brad Rosenberg, opposing counsel for Defendants Hon. John Roberts, Jr., JCCIC, Senator Dianne Feinstein, AFIC, and Major General Richard Rowe. Mr. Rosenberg's address is:

Brad Rosenberg
USDOJ, Civil Division, Federal Programs Branch
PO Box 883
Washington, DC 20044

Mr. Rosenberg consents to this Motion.

- (b) Consultation was obtained with E. Desmond Hogan, opposing counsel for Defendants PIC and Emmett Beliveau. Mr. Hogan's address is:

E. Desmond Hogan
Hogan & Hartson, LLP
555 Thirteenth St., NW
Washington, DC 20004

Mr. Hogan consents to this Motion.

(c) Consultation was obtained with Kevin Snider, opposing counsel for Defendants Rev. Rick Warren and Rev. Joseph Lowery. Mr. Snider's address is:

Kevin Snider
Pacific Justice Institute
9851 Horn Road, Suite 115
Sacramento, CA 95827

Mr. Snider consents to this Motion.

Respectfully submitted this 10th day of March, 2009,

/s/ - Michael Newdow

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CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2009, I filed the following document:

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electronically with the Clerk of the United States District Court for the District of Columbia, using the CM/ECF system. Accordingly, service will assumedly be made upon:

Counsel for Defendants Roberts, JCCIC, Feinstein, AFIC and Rowe:

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