IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA CIVIL DIVISION

LEO DONOHOE,

,

Plaintiff,

v. : Civil Action No.: 07-949 (RWR)

BONNEVILLE INT'L CORP.,

Defendant.

CONSENT MOTION FOR PROTECTIVE ORDER

Defendant Bonneville International Corporation ("Bonneville"), with the consent of plaintiff Leo Donohoe ("Donohoe"), moves this Court for a protective order governing the use and handling of confidential information.

The parties request the entry of this order pursuant to Fed. R. Civ. P. 26(c) so as to protect confidential information such as personal, proprietary, financial, and other sensitive information from unnecessary and harmful disclosure. Information for which the parties seek protection includes: personnel files and applications and other employee-related information; references; payroll information; home or personal addresses; dates of birth; Social Security numbers; information obtained from and regarding Defendant's representation firms; information of a competitively or commercially sensitive proprietary or trade-secret nature; and the parties' financial information not subject to public disclosure. Because this action involves allegations regarding personnel decisions made by Bonneville, much of the information sought to be discovered in this action (whether or not the parties agree that such information is discoverable) involves or relates to private and sensitive information regarding former and current Bonneville personnel. Such information should be protected from disclosure so as to

¹ Defendant also has agreed with third party CBS Radio/WJFK that any CBS Radio/WJFK

avoid unnecessary prejudice to parties not participating in this lawsuit. Other information, including financial commercially sensitive and trade secret information, warrants protection due to its proprietary, non-public nature. Fed. R. Civ. P. 26(c)(7); see also In re Coordinated Pretrial Proceedings in Petroleum Products Antitrust Litig., 101 F.R.D. 34, 41 (C.D. Cal. 1984) (public interest in disclosure of private information at its weakest during discovery) (citing Tavoulereas v. Washington Post, 724 F.2d 1010, 1016 (D.C. Cir. 1984)); Tavoulareas v. Piro, 93 F.R.D. 24, 29 (D.D.C. 1981).

Pursuant to Local Rule 7(m), counsel for defendant hereby certifies that she has conferred with counsel for plaintiff and has obtained plaintiff's consent to the filing of the instant motion and to the entry of the proposed protective order accompanying this motion.

WHEREFORE, the parties respectfully request the entry of the proposed protective order filed herewith.

Dated: February 25, 2008

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

Constance M. Pendleton /s/

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Counsel for Defendant Bonneville International Corporation

documents produced that CBS Radio/WJFK designates as "Confidential" will be covered by the protective order.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of February, 2008, I directed that true and correct copies of the foregoing Consent Motion for Protective Order be delivered by electronic mail (ECF) and first class mail, postage pre-paid, to the following:

Thomas L. McCally, Esq. Carr Maloney P.C. 1615 L Street, NW Suite 500 Washington, D.C. 20036

Constance M. Pendleton /s/
Constance M. Pendleton