

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

NATIONAL VETERANS LEGAL  
SERVICES PROGRAM, NATIONAL  
CONSUMER LAW CENTER, and  
ALLIANCE FOR JUSTICE, for themselves  
and all others similarly situated,

*Plaintiffs,*

v.

UNITED STATES OF AMERICA,  
*Defendant.*

Civil Action No. 16-745 ESH

**CONSENT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

The parties have conferred, and believe that a Protective Order is necessary to protect the privacy of PACER account holders, whose information must be provided to the class administrator for purposes of providing notice to the class. Protection of class member data constitutes sufficient good cause to justify limiting the use of information obtained for purposes of providing class notice, and to justify the entry of a protective order. Fed. R. Civ. P. 26(c); *Aguirre v. Shapiro*, 263 F.R.D. 26, 29 (D.D.C. 2009).

The parties have agreed on the attached Stipulated Protective Order to apply to the production of class member data for purposes of class notice, and Defendant has consented to the filing of this Motion. Therefore, Plaintiffs respectfully request that the Court grant the Consent Motion and enter the attached Stipulated Protective Order.

By: /s/ William H. Narwold  
MOTLEY RICE LLC

William H. Narwold  
bnarwold@motleyrice.com  
DC Bar No. 502352

One Corporate Center  
20 Church Street, 17th Floor  
Hartford, CT 06103  
Telephone: (860) 882-1676  
Facsimile: (860) 882-1682

GUPTA WESSLER PLLC

Deepak Gupta, Esq.  
deepak@guptawessler.com  
Jonathan E. Taylor  
jon@guptawessler.com  
1735 20th Street, NW  
Washington, DC 20009  
Telephone: (202) 888-1741  
Facsimile: (202) 888-7792

*Counsel for Plaintiffs and the  
Class*

**CERTIFICATE OF SERVICE**

I, William H. Narwold, declare that I am over the age of eighteen (18) and not a party to the entitled action. I am a principal of the law firm MOTLEY RICE LLC, and my office is located at One Corporate Center, 20 Church Street, 17th Floor, Hartford, CT 06103.

On March 31, 2017, I caused to be filed the following in the above-captioned case:

**Consent Motion For Entry Of Stipulated Protective Order**

with the Clerk of Court using the Official Court Electronic Document Filing System, which served copies on all interested parties registered for electronic filing.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 31, 2017

Respectfully submitted,

By: /s/ William H. Narwold  
William H. Narwold  
MOTLEY RICE LLC