

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

MAUREEN TOFFOLONI,)
as Administrator and Personal)
Representative of the ESTATE)
OF NANCY E. BENOIT,)

Plaintiff,)

vs.)

LFP PUBLISHING GROUP, LLC,)
d/b/a Hustler Magazine, et al,)

Defendant.)

CASE NO. 1:08-cv-00421-TWT

[PROPOSED]

PROTECTIVE ORDER

This matter having come before the Court on Defendant LFP’s Motion for a Protective Order, the Court hereby finds that good cause exists for the entry of a protective order to strike Plaintiff’s First Interrogatories Nos. 7 through 9; Plaintiff’s First Request for Production of Documents Nos. 2 through 7; and Plaintiff’s Rule 30(b)(6) Notice of Deposition of LFP Topic Nos. 3, 4 and 8 through 11.

It is HEREBY ORDERED that Defendant LFP has no obligation to respond to Plaintiff’s First Interrogatories Nos. 7 through 9; Plaintiff’s First Request for

Production of Documents Nos. 2 through 7; or Plaintiff's Rule 30(b)(6) Notice of Deposition of LFP Topic Nos. 3, 4 and 8 through 11.

SO ORDERED, this ____ day of _____ 2010.

Hon. Thomas W. Thrash, Jr.
United States District Court Judge

PREPARED BY:

S. Derek Bauer
Georgia Bar No. 042537

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CERTIFICATE OF SERVICE

This is to certify that I have this day filed the within and foregoing PROPOSED PROTECTIVE ORDER via the CM/ECF system which will automatically send notification to Plaintiff's attorneys of record, who are participants in the CM/ECF system.

This 7th day of January 2010.

/s/ S. Derek Bauer

S. Derek Bauer
Georgia Bar No. 042537

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