

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES EQUAL EMPLOYMENT)	
OPPORTUNITY COMMISSION,)	
)	
Plaintiff,)	
)	Case No. 05 C 0208
v.)	
)	Judge James Zagel
SIDLEY AUSTIN LLP,)	
)	
Defendant.)	
)	

**AGREED MOTION TO AMEND PROTECTIVE ORDER
GOVERNING SUBSEQUENT EMPLOYMENT INFORMATION AND DOCUMENTS**

Sidley Austin LLP (“Sidley”), by and through its attorneys, and with the agreement of the Equal Employment Opportunity Commission (“EEOC”) (collectively, the “Parties”), submits this Agreed Motion To Amend Protective Order Governing Subsequent Employment Information And Documents and states the following in further support:

1. On January 25, 2007, this Court entered the Protective Order Governing Subsequent Employment Information And Documents (“Subsequent Employment Protective Order”).
2. The Subsequent Employment Protective Order presently permits confidential information to be disclosed only to one attorney and one legal assistant and one damages expert and one assistant (collectively, the “Designees”) from both the EEOC and Sidley. *Id.* at § II.F. It permits no current Sidley partner to view or receive this information. *Id.*
3. The Parties request that the Subsequent Employment Protective Order be amended to permit all Grippo & Elden personnel and all EEOC personnel working on this case

to have access, for the purposes of this litigation only, to Subsequent Employment Information and Documents designated confidential therein.

4. The Parties further request that the Subsequent Employment Protective Order be amended to permit Bill Conlon, General Counsel for Sidley, to have access to Subsequent Employment Information, but not Documents, for purposes of this litigation only.

5. Finally, the Parties request that the Subsequent Employment Protective Order be amended so that oral confidentiality designations on the record are no longer required in a deposition, and to permit the non-examining party to, by written notice to opposing counsel not later than thirty (30) days after the date of the deposition, designate any portion(s) of the deposition Confidential. Within fourteen (14) days of service of the other party's designations, the examining party may make any additional confidentiality designations.

6. Accordingly, the Parties seek an Order amending the Subsequent Employment Protective Order as indicated in the proposed Amended Protective Order Governing Subsequent Employment Information And Documents, attached hereto as Exhibit A. For the Court's convenience, a red-lined version comparing the proposed order to the existing order is attached hereto as Exhibit B.

7. Sidley expressly reserves the right to seek leave of Court to share Subsequent Employment Information and Documents with (1) client representatives in addition to Bill Conlon and (2) counsel for Sidley's insurers.

8. A copy of this motion and exhibits was provided to the EEOC prior to filing. The EEOC does not object to entry of this motion or the relief requested therein.

WHEREFORE, the Parties request that the Court enter the Amended Subsequent Employment Protective Order that is attached hereto as Exhibit A, and for such additional relief as the Court deems appropriate.

Dated: May 8, 2007

Respectfully submitted,

SIDLEY AUSTIN LLP

By: /s/ Maile H. Solís
One of Its Attorneys

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CERTIFICATE OF SERVICE

I, Maile H. Solís, an attorney, hereby certify that on May 8, 2007 I caused a true and complete copy of the foregoing **AGREED MOTION TO AMEND PROTECTIVE ORDER GOVERNING SUBSEQUENT EMPLOYMENT INFORMATION AND DOCUMENTS** to be served on counsel for plaintiff by electronic filing notification to the following:

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/s/ Maile H. Solís
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