

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

UNITED STATES EQUAL EMPLOYMENT)	
OPPORTUNITY COMMISSION,)	
)	
Plaintiff,)	
)	Case No. 05 cv 0208
v.)	
)	Judge James Zagel
SIDLEY AUSTIN BROWN & WOOD LLP,)	Magistrate Judge Ashman
)	
Defendant.)	

AGREED MOTION TO AMEND PROTECTIVE ORDER

Plaintiff United States Equal Employment Opportunity Commission (“EEOC”) respectfully moves this Court to enter the proposed Amended Protective Order, attached as Exhibit A. Defendant Sidley Austin, LLP (“Sidley”), consents to this motion. In support of this motion, the EEOC states the following:

1. On September 2, 2005, the Court entered a protective order (“Protective Order”) in this action, which permits a party to designate certain discovery materials confidential if they contain “Confidential Information,” as that term is defined by the Protective Order. See Protective Order, §§ I, III, attached as Exhibit B.

2. The proposed Amended Protective Order includes a new paragraph, designated § III.D, which would require a party making a confidentiality designation to contemporaneously identify the basis or bases for that designation. Except for a reference to this Motion in the first sentence of the proposed Amended Protective Order, the remainder of the proposed Amended

Protective Order is identical to the original Protective Order. In particular, no substantive amendment is proposed.

3. The parties believe the proposed amendment will reduce the frequency of disputes concerning confidentiality designations and facilitate the resolution of any disputes that do arise.

4. For the reasons stated herein, the EEOC, with Sidley's consent, respectfully requests that the Court enter the proposed Amended Protective Order.

June 15, 2006

Respectfully Submitted,

s/ Justin Mulaire

Laurie Elkin

Deborah Hamilton

Justin Mulaire

Trial Attorneys

U.S. Equal Employment Opportunity Commission

500 West Madison St., Room 2800

Chicago, IL 60661

312-353-7722