

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

RUDE MUSIC, INC.,	)	
	)	
Plaintiffs,	)	
	)	Case No. 12 cv 640
v.	)	
	)	Judge Kennelly
NEWT 2012, INC., NEWT	)	Magistrate Judge Finnegan
GINGRICH, and AMERICAN	)	
CONSERVATIVE UNION,	)	
	)	
Defendants.	)	
	)	

**AGREED MOTION FOR ENTRY OF A PROTECTIVE ORDER**

Plaintiff Rude Music, Inc., pursuant to Federal Rules of Civil Procedure 26(c)(1), moves for entry of a protective order governing discovery in this case.

1. This is an action for copyright infringement, arising from the defendants’ alleged infringement of the plaintiff’s copyrighted musical composition, “Eye of the Tiger.”

2. The parties anticipate that discovery in this action will involve the exchange of confidential personal or financial and other commercially sensitive data that is not publicly known. The parties have agreed on the terms of a proposed protective order, which is attached as Exhibit 1. Its provisions, for the most part, track those in the form protective order approved for use in patent cases in this district. See LPR 1.4 and Appendix B.

WHEREFORE, for the foregoing reasons, Rude Music asks that the Court enter the protective order as attached or with modifications as the Court deems appropriate.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2012, the foregoing Plaintiff's Motion for Entry of a Protective Order was electronically filed using the CM/ECF system and served upon:

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