

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

EQUAL EMPLOYMENT OPPORTUNITY)
 COMMISSION,)
)
 Plaintiff,)
)
 v.)
)
 FREEMAN)
)
 Defendant)
)
)
)
 _____)

Case No.: RWT-09-CV-2573

DEFENDANT’S UNCONTESTED MOTION FOR AGREED PROTECTIVE ORDER

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Defendant Freeman moves the Court to enter a Stipulated Protective Order which Plaintiff EEOC and Freeman have negotiated, and to which they have agreed. The Stipulated Protective Order is attached to this Motion.

The grounds for this Motion, which EEOC does not oppose, are the following:

1. The materials subject to discovery in this case include some that Freeman considers confidential.
2. The entry of a protective order will promote the flow of information in discovery and decrease the likelihood of litigating the confidentiality of each document or piece of information considered confidential by Freeman.
3. The parties have negotiated, agreed to, and signed the Protective Order this motion seeks to have entered.

WHEREFORE, Defendant Freeman requests that the Court enter the Stipulated Protective Order attached hereto.

Dated: July 20, 2010

Respectfully submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP



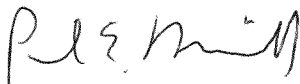
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Attorneys for Defendant Freeman

CERTIFICATE OF SERVICE

This is to certify that the undersigned caused to be served on July 20, 2010 the foregoing Defendant's Uncontested Motion for Agreed Protective Order via email and first class mail, postage prepaid, to the following:

Debra M. Lawrence
Ronald L. Phillips
EEOC Baltimore Field Office
City Crescent Building
10 South Howard Street, 3rd Floor
Baltimore, MD 21201



Paul E. Mirengoff