UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

JAYME GORDON,

Plaintiff,

V.

C.A. No. 1:11-cv-10255-JLT

DREAMWORKS ANIMATION SKG, INC., DREAMWORKS ANIMATION LLC, and PARAMOUNT PICTURES, CORP.,

Defendants.

JOINT MOTION FOR PROTECTIVE ORDER

Pursuant to Fed. R. Civ. P. 26(c), the parties move this Court to enter a protective order in this case. Entry of a protective order will facilitate the free flow of information during the discovery process while protecting the parties' confidential information from disclosure to competitors and the public. The parties have agreed to the form of a Protective Order, which is attached as Exhibit A. The parties respectfully request that the proposed Protective Order attached as Exhibit A be entered as an Order of the Court.

Dated: June 28, 2011

Respectfully Submitted,

JAYME GORDON,

DREAMWORKS ANIMATION SKG, INC., DREAMWORKS ANIMATION LLC, and PARAMOUNT PICTURES, CORP.

By his Attorneys,

By their Attorneys,

/s/ Thomas A. Brown

Gregory A. Madera, BBO #313,020 Thomas A. Brown, BBO #657,715 Maureen M. Brenner, BBO #679,573 FISH & RICHARDSON P.C. One Marina Park Drive Boston, MA 02210-1878 (617) 542-5070 madera@fr.com; tbrown@fr.com; mbrenner@fr.com

Mark A. Fischer, BBO #167,100 DUANE MORRIS LLP 470 Atlantic Avenue, Suite 500 Boston, MA 02210-2243 (857) 488-4200 mafischer@duanemorris.com

Juanita R. Brooks, *pro hac vice* FISH & RICHARDSON P.C. 12390 El Camino Real San Diego, CA 92130 (858) 678-5070; brooks@fr.com

Michael J. Kane, pro hac vice Joel D. Leviton, pro hac vice FISH & RICHARDSON P.C. 3200 RBC Plaza 60 South Sixth Street Minneapolis, MN 55402 (612) 335-5070 kane@fr.com; leviton@fr.com

Kristen McCallion, *pro hac vice* FISH & RICHARDSON P.C. 601 Lexington Avenue, 52nd Floor New York, NY 10022 (212) 765-5070; mccallion@fr.com

/s/ Julia Huston

John A. Shope, BBO #562,056 Julia Huston, BBO #562,160 David A. Kluft, BBO #658,970 FOLEY HOAG LLP Seaport West 155 Seaport Boulevard Boston, MA 02210-2600 (617) 832-1000 jhuston@foleyhoag.com; jshope@foleyhoag.com; dkluft@foleyhoag.com

Jonathan Zavin, pro hac vice LOEB & LOEB LLP 345 Park Avenue New York, NY 10154 (212) 407-4161 jzavin@loeb.com

David Grossman, pro hac vice LOEB & LOVE LLP 10100 Santa Monica Blvd., Suite 2200 Los Angeles, CA 90067 (310) 282-2000 dgrossman@loeb.com

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 28th day of June, 2011.

/s/ Thomas A. Brown
Thomas A. Brown

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