

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

TIMEBASE PTY LTD.,

Plaintiff,

vs.

THE THOMSON CORPORATION,
WEST PUBLISHING CORPORATION,
and WEST SERVICES, INC.,

Defendants.

Civil No. 07-1687 (JNE/JJG)

**DEFENDANTS' MOTION FOR
PROTECTIVE ORDER**

MOTION

The defendants collectively move for a protective order under Federal Rule of Civil Procedure 26(c) precluding the plaintiff, TimeBase Pty Ltd, from deposing defendants' attorney, Mr. Mark Stignani.

The basis for the motion is that Mr. Stignani is in-house litigation counsel for the defendants. Information regarding all of the topics on which TimeBase seeks to depose Mr. Stignani may be obtained from other sources, is not relevant or is privileged, and/or is not crucial to the preparation of TimeBase's case.

This motion is based on the accompanying Memorandum in Support of Defendants' Motion for Protective Order, Declarations, Exhibits, and the files, records, and proceedings in this case.

Dated: October 11, 2010

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By: /s/ Mary V. Sooter

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