

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

S. VICTOR WHITMILL,)	
)	
)	Plaintiff,
)	
v.)	Civil Action No. 4:11-cv-752
)	
WARNER BROS. ENTERTAINMENT, INC.,)	Judge Catherine D. Perry
)	
Defendant.)	

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Plaintiff S. Victor Whitmill and Defendant Warner Bros. Entertainment, Inc., by their respective attorneys, move this Court for entry of an Agreed Protective Order. In support of their motion, the parties state as follows:

1. The parties have certain documents and information responsive to discovery requests or relevant to the case the unrestricted use of which would be harmful to the producing party or that the producing party is obligated to maintain as confidential.
2. The parties have agreed that such documents and information shall remain confidential and have prepared and executed an Agreed Protective Order which sets forth the procedures for production, disclosure and use of information designated as confidential by either party.
3. The Agreed Protective Order is attached to this Motion as Exhibit A.

WHEREFORE, the parties request that this Court enter the Agreed Protective Order attached as Exhibit A.

AGREED:

/s/ Michael A. Kahn
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CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2011 I electronically filed the foregoing Joint Motion for Entry of Agreed Protective Order with the Clerk of the Court using the CM/ECF system, which will cause an electronic copy to be served on counsel of record.

/s/ Mark Sableman

Mark Sableman

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