

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
(NEWARK VICINAGE)**

BONNER KIERNAN TREBACH  
& CROCIATA, LLP  
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(973) 335-8480  
Attorneys for Defendant  
Tri-Union Seafoods, L.L.C.  
d/b/a Chicken of the Sea  
(KS-7180)

DEBORAH FELLNER,	:	CIVIL ACTION NO. 2:06-CV-688 (DMC)-MF
	:	
Plaintiff,	:	
	:	
v.	:	<b>NOTICE OF MOTION FOR PROTECTIVE</b>
	:	<b>ORDER</b>
	:	
TRI-UNION SEAFOODS, L.L.C.,	:	
d/b/a CHICKEN OF THE SEA,	:	
	:	JANUARY 24, 2011
Defendant.	:	

**To:** Barry R. Eichen, Esq.  
Eichen Levinson & Crutchlow, LLP  
40 Ethel Road  
Edison, New Jersey 08817  
Attorneys for Plaintiff

**PLEASE TAKE NOTICE** that on January 24, 2011 at 9:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned, counsel for defendant Tri-Union Seafoods, L.L.C. d/b/a Chicken of the Sea, will apply to the United States District Court, District of New Jersey, Newark Vicinage, at the Martin Luther King, Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey for the following relief:

**Protective Order**

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, the undersigned will rely upon the Memorandum of Law, Certification of Ken Schoen, Esq with attached exhibits and Affidavit of John Barker filed herewith.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Respectfully submitted,

BONNER KIERNAN TREBACH  
& CROCIATA, LLP  
Attorneys for Defendant  
Tri-Union Seafoods, L.L.C.  
d/b/a Chicken of the Sea

Dated: December 15, 2010

By:



Kenneth A. Schoen (KS-7180)