IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

JOHN DOE,

Plaintiff,

vs.

No. CV 08 1041 MCA LFG

CITY OF ALBUQUERQUE,

Defendant.

UNOPPOSED MOTION FOR A PROTECTIVE ORDER

COMES NOW THE PLAINTIFF, by and through the undersigned counsel of record, and respectfully moves this Court to enter the Stipulated Protective Order being submitted simultaneously with this Motion. As grounds therefore, the Plaintiff respectfully submits the following.

1. The Plaintiff seeks a protective order that would permit him to pursue this matter under the pseudonym "John Doe."

2. Counsel for the parties have conferred and have agreed to the Stipulated Protective Order being submitted to the Court. The Stipulated Protective Order will permit Plaintiff to pursue this litigation under the pseudonym "John Doe." Pursuant to the Order, Mr. Doe's true identity shall be disclosed only to his attorneys and the attorneys of record for Defendant City of Albuquerque.

3. Counsel for Defendant have represented that the Motion is unopposed.

WHEREFORE, the Plaintiff respectfully requests that the Court find this motion to be well-taken and that it enter the Stipulated Protective Order being submitted herewith.

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Respectfully submitted,

ACLU of NEW MEXICO

/s/ George Bach 11/17/08

Brendan Egan George Bach Staff Attorney P.O. Box 566 Albuquerque, NM 87103 (505) 243-0046 Facsimile (505) 266-5916

Maureen A. Sanders Cooperating Attorney Sanders & Westbrook, PC 102 Granite Avenue, NW Albuquerque, NM 87102 (505) 243-2243 <u>OF COUNSEL</u>

Attorneys for Plaintiff

I HEREBY CERTIFY that on November 17, 2008, I filed the foregoing pleading electronically through the CM/ECF system and caused the following parties and/or counsel to be served electronically through the CM/ECF system:

Gregory S. Wheeler Peter H. Pierotti Assistant City Attorneys P.O. Box 2248 Albuquerque, NM 87103

Attorneys for Defendant

/s/Submitted Electronically 11/17/08 George Bach

CITY OF ALBUQUERQUE

ROBERT M. WHITE City Attorney

Gregory S. Wheeler Peter H. Pierotti P.O. Box 2248 Albuquerque, NM 87103 (505) 768-4500

Attorneys for Defendant