## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

STUDENTS FOR FAIR ADMISSIONS,	)
INC.,	) Case No.
	) 1:14-CV-954
Plaintiffs,	
v.	)
	) JOINT MOTION FOR ENTRY OF
THE UNIVERSITY OF NORTH	) PROTECTIVE ORDER
CAROLINA AT CHAPEL HILL, et al.,	
D 0 1	
Defendants.	)
	)

# **JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

Plaintiff Students for Fair Admissions, Inc. and Defendants The University of North Carolina at Chapel Hill, et al., anticipate that certain material containing confidential information is likely to be disclosed or produced during the course of discovery in this case.

Accordingly, the parties jointly respectfully request that the Court enter the proposed Protective Order, attached hereto as Exhibit 1, setting forth the conditions for treating, obtaining, and using such information.

## Respectfully submitted this 6th day of July, 2015.

## ROY COOPER Attorney General

## /s/ Stephanie Brennan

Stephanie Brennan

Special Deputy Attorney General

NC State Bar No. 35955

E: sbrennan@ncdoj.gov

### /s/ Matthew Tulchin

Matthew Tulchin

**Assistant Attorney General** 

NC State Bar No. 43921

E: mtulchin@ncdoj.gov

NC Department of Justice

Post Office Box 629

Raleigh, NC 27602-0629

T: (919) 716-6920

### /s/ Michael Scudder

Michael Scudder

Skadden, Arps, Slate, Meagher & Flom

LLP

155 North Wacker Driver

Chicago, IL 60606-1720

(312) 407-0877

E: michael.scudder@skadden.com

#### /s/ Lisa Gilford

Lisa Gilford

Skadden, Arps, Slate, Meagher & Flom

LLP

300 South Grand Ave.

**Suite 3400** 

Los Angeles, CA 90071

(213) 687-5130

E: lisa.gilford@skadden.com

Attorneys for Defendants

## /s/ Thomas R. McCarthy

Thomas R. McCarthy

Consovoy McCarthy PLLC

3033 Wilson Boulevard, Suite 700

Arlington, Virginia 22201

(703) 243-9423

E: tom@consovoymccarthy.com

## /s/ William S. Consovoy

William S. Consovoy

Consovoy McCarthy PLLC

3033 Wilson Boulevard, Suite 700

Arlington, Virginia 22201

(703) 243-9423

E: will@consovoymccarthy.com

## /s/ J. Michael Connolly

J. Michael Connolly

Consovoy McCarthy PLLC

3033 Wilson Boulevard, Suite 700

Arlington, Virginia 22201

(703) 243-9423

E: mike@consovoymccarthy.com

#### /s/ Alan M. Ruley

N.C. State Bar No. 16407

Bell, Davis & Pitt, P.A.

P.O. Box 21029

Winston Salem, NC 27120-1029

(336) 714-4147

E: aruley@belldavispitt.com

Attorneys for Plaintiff

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 6, 2015, I filed a true and correct copy of the foregoing JOINT MOTION FOR PROTECTIVE ORDER with the Clerk of Court using the CM/ECF system.

This 6th day of July, 2015

/s/ Michael Scudder
Michael Scudder
Skadden, Arps, Slate, Meagher &
Flom LLP
155 North Wacker Driver
Chicago, IL 60606-1720
(312) 407-0877

E: michael.scudder@skadden.com