

IN THE UNITED STATES DISTRICT COURT FOR THE  
 WESTERN DISTRICT OF TEXAS  
 AUSTIN DIVISION

DELIVERANCE POKER, LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 1:10-CV-00664-JRN
	§	
MICHAEL MIZRACHI and	§	
TILTWARE, LLC,	§	
	§	
Defendants.	§	

**PLAINTIFF’S MOTION FOR ENTRY OF PROTECTIVE ORDER**

Plaintiff Deliverance Poker, LLC requests the Court to enter a Protective Order in accordance with Rule 26(c) and Appendix H of the Local Court Rules. Plaintiff anticipates producing documents that are confidential and proprietary and, therefore, seeks this Protective Order.

For the foregoing reasons, Plaintiff Deliverance Poker, LLC requests the Court to enter the Protective Order submitted along with this motion.

Respectfully submitted,

By: /s/ Douglas M. Becker  
**Douglas M. Becker**  
 Texas State Bar No. 02012900  
**John D. Jacks**  
 Texas State Bar No. 00785986  
**GRAY & BECKER, P.C.**  
 900 West Avenue  
 Austin, Texas 78701  
 Telephone: (512) 482-0061  
 Facsimile: (512) 482-0924  
**COUNSEL FOR PLAINTIFF**  
**DELIVERANCE POKER, LLC**

### **CERTIFICATE OF CONFERENCE**

I certify that on Tuesday, December 21, 2010, I attempted to confer with John P. Henry, counsel for Defendant Michael Mizrachi via email, and he informed me that he is not opposed to the entry of a protective order “assuming it is not unduly restrictive.” I further certify that on December 17, 2010, I conferred by email with Ian Imrich, counsel for Tiltware, LLC on this motion, and he informed me that Tiltware, LLC is seeking local counsel and will not have a position on such motion until Tiltware, LLC retains local counsel and can consider the motion.

/s/ John D. Jacks  
John D. Jacks

### **CERTIFICATE OF SERVICE**

I certify that on 12/21/2010, I caused the Plaintiff’s Motion for Entry of Protective Order to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following counsel for Defendant Michael Mizrachi:

John P. Henry  
The Law Offices of John Henry, P.C.  
P.O. Box 1838  
Round Rock, Texas 78680

I further certify that on 12/21/10, I caused Plaintiff’s Motion for Entry of Protective Order to be served on counsel for Defendant Tiltware, LLC by fax and email as follows:

Ian J. Imrich  
10866 Wilshire Boulevard, Suite 1240  
Los Angeles, California 90024  
310.481.4475 (Fax)  
ian@ijilaw.com

/s/ John D. Jacks  
John D. Jacks