

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

CORBIN BERNSSEN,

Plaintiff and Counterclaim Defendant,

v.

Civil Action No. 2:11cv546

INNOVATIVE LEGAL MARKETING, LLC,

Defendant and Counterclaim Plaintiff.

MOTION AND BRIEF FOR ENTRY OF AN AGREED PROTECTIVE ORDER

NOW COMES Defendant and Counterclaim Plaintiff Innovative Legal Marketing, LLC, by counsel, and for its Motion and Brief for Entry of an Agreed Protective Order states as follows:

1. In order to protect the privacy of the Parties and Third-Parties, the confidentiality of their legitimate business interests and other non-public, competitively sensitive, proprietary, trade secret or confidential business information, and to permit discovery and trial preparation to proceed with a minimum of discovery motions over matters of confidentiality, the parties have negotiated an agreed protective order that they propose the Court enter in this matter.
2. The Proposed Order is attached as Exhibit A and has been agreed to by counsel for both parties.

WHEREFORE ILM respectfully requests the Court enter the agreed proposed Order in this matter.

INNOVATIVE LEGAL MARKETING, LLC

/s Dustin Paul

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CERTIFICATE OF SERVICE

I hereby certify that on Friday, March 30, 2012, I will file the foregoing in ECF which will serve a copy on those parties listed below:

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