

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CITY OF SEATTLE, a first-class charter
city,

Plaintiff,

v.

THE PROFESSIONAL BASKETBALL
CLUB, LLC, an Oklahoma limited liability
company,

Defendant.

No. CV07-1620 MJP

AGREED MOTION FOR ENTRY OF
PROTECTIVE ORDER REGARDING
HANDLING OF CONFIDENTIAL
MATERIAL

**NOTED FOR CONSIDERATION:
March 7, 2008**

Plaintiff the City of Seattle ("the City"), and defendant The Professional Basketball Club, LLC ("the PBC") jointly move for entry of the attached PROTECTIVE ORDER REGARDING HANDLING OF CONFIDENTIAL MATERIAL.

The City and the PBC anticipate that much information disclosed and many documents produced in this action will contain sensitive research, development and/or commercial information, as well as confidential and personal information pertaining to employees, staff, management and player personnel. The parties understand that, for any such information to be sealed under FRCP 26(c), the party seeking a seal bears the burden of justifying the seal and overcoming the strong presumption in favor of public access.

AGREED MOTION FOR ENTRY OF
PROTECTIVE ORDER - 1
CASE NO. CV07- 1620 MJP

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1 The parties' proposed protective order is not intended to take the place of the uniform
2 procedure set forth in Local Rule 5(g) for motions to seal, but rather to govern the
3 production and handling of confidential information between the parties and to delineate
4 the mechanics for the parties' filing of confidential information and corresponding
5 motions to seal under LR 5(g).

6 Agreed and requested by:

7 KIRKPATRICK & LOCKHART
8 PRESTON GATES & ELLIS, LLP

BYRNES & KELLER, LLP
Seattle City Attorney

9 By: 

By: 

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CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2008, I electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the counsel of record.

KIRKPATRICK & LOCKHART
PRESTON GATES & ELLIS, LLP

By: Georgia Drake
Georgia Drake

Secretary to Michele Jensen