

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

NORCAL TEA PARTY PATRIOTS, <i>et al.</i> ,  Plaintiffs,  v.  INTERNAL REVENUE SERVICE, <i>et al.</i> ,  Defendants.
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Case No. 1:13-cv-000341

Judge Michael R. Barrett

Oral Argument Requested

**CERTAIN FORMER INDIVIDUAL MANAGEMENT DEFENDANTS' MOTION FOR A  
PROTECTIVE ORDER**

Pursuant to Rule 26(c)(1)(F) of the Federal Rules of Civil Procedure, former Individual Management Defendants, Lois Lerner and Holly Paz, respectfully request that this Court enter a protective order sealing their depositions and restricting dissemination of the sealed deposition transcripts and testimony to the attorneys of record in this action. As set forth more fully in the accompanying Memorandum of Law and Declarations, good cause for such protection exists because the public dissemination of their deposition testimony would expose them and their families to harassment and threat of serious bodily injury or even death.

As required by Federal Rule of Civil Procedure 26(c), counsel for Mss. Lerner and Paz have in good faith met and conferred with counsel for Plaintiffs in an attempt to resolve this dispute without Court action. The parties were unable to reach a resolution.

Dated: April 12, 2017

Respectfully Submitted,

/s/ Mark Hayden

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*Counsel for Former Individual Management  
Defendants Lois G. Lerner and Holly Paz*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 12th day of April, 2017, Certain Former Individual Management Defendants' Motion for a Protective Order, Memorandum of Law in Support, supporting Declarations and Exhibits, and Proposed Order were electronically filed via the Court's CM/ECF system and electronically served upon registered parties via the Court's electronic notification system.

/s/ Catherine Cockerham  
Catherine Cockerham