

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

COMMON CAUSE GEORGIA, as an)	
organization,)	
)	
Plaintiff,)	
)	Civil Action
v.)	
)	File No. 1:18-CV-05102-AT
BRAD RAFFENSPERGER, in his official)	
capacity as Secretary of State of Georgia,)	
)	
Defendant.)	

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

The parties hereby jointly move the Court for an order approving and entering the attached Stipulated Protective Order. In support of this motion, the parties state as follows:

1. Plaintiff has requested documents that include personal identifying information of voters and other information that is not public pursuant to federal or state law. Plaintiff has also requested information about the security of voting systems, which is highly confidential protected information to ensure the ongoing security of those systems. Defendant has requested non-public information about the operations of Plaintiff.

2. In order to facilitate the discovery process and avoid delays, the parties have agreed to the terms of the Stipulated Protective Order attached as Exhibit A.
3. While the parties recognize that protective orders are the exception to the general rule of public access to the courts, the Stipulated Protective Order will facilitate discovery and will limit the need for the Court to resolve issues related to confidentiality.

WHEREFORE, the parties respectfully request entry of the Stipulated Protective Order attached as Exhibit A.

L.R. 7.1(D) CERTIFICATION

I certify that this Motion has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Motion has been prepared using 14-pt Times New Roman Font.

Respectfully submitted this 5th day of March, 2019.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the within and foregoing **JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER** with the Clerk of Court using the CM/ECF system, which automatically sent counsel of record e-mail notification of such filing.

This 5th day of March, 2019.

/s/ Bryan P. Tyson

Bryan P. Tyson

Georgia Bar No. 515411