

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

EMILY GILBY; TEXAS DEMOCRATIC
PARTY; DSCC; DCCC; and TERRELL
BLODGETT,

Plaintiffs,

v.

RUTH HUGHS, in her official capacity as
the Texas Secretary of State,

Defendant.

CIVIL ACTION NO. 1:19-cv-01063

JOINT MOTION FOR ENTRY OF CONFIDENTIALITY AND PROTECTIVE ORDER

The parties jointly move the Court to enter the accompanying Confidentiality and Protective Order. This protective order specifies the conditions under which private, sensitive, and/or legally confidential documents and information in possession of the parties must be exchanged, used, and protected in this litigation, and authorizes the parties to disclose that information in response to discovery requests. This protective order is justified by Rule 26(c) of the Federal Rules of Civil Procedure and relevant case law and is necessary in order for the parties to obtain relevant and essential discovery. Prompt entry of this order authorizing the parties to disclose such records is necessary for the conduct of discovery in this action. The parties, therefore, respectfully request that the attached Confidentiality and Protective Order be adopted by order of the Court.

Date: May 6, 2020

KEN PAXTON
Attorney General of Texas

JEFFREY C. MATEER
First Assistant Attorney General

RYAN L. BANGERT
Deputy First Assistant Attorney General

Respectfully submitted.

/s/ Patrick K. Sweeten
PATRICK K. SWEETEN
Associate Deputy for Special Litigation

TODD LAWRENCE DISHER
Deputy Chief, Special Litigation Unit

MATTHEW H. FREDERICK
Deputy Solicitor General

WILLIAM T. THOMPSON
Special Counsel

ERIC A. HUDSON
Special Counsel

MICHAEL R. ABRAMS
Assistant Attorney General

DOMINIQUE G. STAFFORD
Assistant Attorney General

OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 936-1414
Fax: (512) 936-0545
patrick.sweeten@oag.texas.gov
todd.disher@oag.texas.gov
matthew.frederick@oag.texas.gov
will.thompson@oag.texas.gov
eric.hudson@oag.texas.gov
michael.abrams@oag.texas.gov
dominique.stafford@oag.texas.gov

**COUNSEL FOR THE TEXAS SECRETARY OF
STATE**

AGREED:

/s/ John Hardin

John Hardin
*Counsel for Plaintiffs Emily Gilby,
Texas Democratic Party, DSCC, and
DCCC*

/s/ Renea Hicks

Renea Hicks
Counsel for Plaintiff Terrell Blodgett

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on May 6, 2020, and that all counsel of record were served by CM/ECF.

/s/ Patrick K. Sweeten
PATRICK K. SWEETEN