

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

O. JOHN BENISEK, *et al.*,

Plaintiffs,

v.

LINDA H. LAMONE, *et al.*,

Defendants.

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Case No. 13-cv-3233

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MOTION FOR PROTECTIVE ORDER FROM RULE 30(B)(6) DEPOSITION

For the reasons stated in the accompanying memorandum, the Defendants, Linda H. Lamone, State Administrator of Elections, and David J. McManus, Jr., Chair, State Board of Elections, move pursuant to Fed. R. Civ. P. 26(c)(1) for a protective order from the deposition notice served on them by the plaintiffs under Fed. R. Civ. P. 30(b)(6), on the ground that the notice is unduly burdensome because it seeks information not known or reasonably available to either the State Administrator of Elections or the State Board of Elections.

A proposed order is attached.

Respectfully submitted,

BRIAN E. FROSH
Attorney General of Maryland

Dated: January 16, 2017

_____/s/____Jennifer L. Katz_____
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