

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)

PAGE, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF
ELECTIONS, *et al.*,

Defendants.

Civil Action No. 3:13-cv-00678-REP-LO-AKD

**MOTION TO QUASH SUBPOENAS TO ROBERT B. BELL, WILLIAM ROBERT
JANIS, AND CHRISTOPHER MARSTON AND/OR FOR A PROTECTIVE ORDER**

Robert B. Bell, William Janis, and Christopher Marston (collectively, “Movants”), by counsel, respectfully request, pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure, to quash subpoenas issued to Movants in the above-captioned proceeding and/or for a protective order with respect to the subpoenas. In support of this Motion, Movants submit the accompanying memorandum of points and authorities.

WHEREFORE, Movants respectfully request that the Court grant their motion to quash the subpoenas to Robert B. Bell, William Robert Janis, and Christopher Marston and/or for a protective order.

Dated: March 28, 2014

Respectfully submitted,

ROBERT B. BELL, WILLIAM ROBERT JANIS,
AND CHRISTOPHER MARSTON

By Counsel

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RULE 26(c)(1) CERTIFICATION

Pursuant to Rule 26(c)(1) of the Federal Rules of Civil Procedure and Local Civil Rule 37(e), counsel for Movants certify that they have conferred in good faith with counsel for Plaintiffs via electronic mail and telephone to explore the possibility of narrowing or resolving this issue without court action. Those efforts have been unsuccessful.

/s/ Jennifer M. Walrath

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of March, 2014, a copy of the foregoing Motion to Quash Subpoenas to Robert B. Bell, William Janis, and Christopher Marston and/or for a Protective Order was filed and served pursuant to the Court's electronic filing procedures using the Court's CM/ECF system on the following counsel of record:

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