

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JOHN A. PATTERSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 5:17-CV-00467
	)	
DEFENSE POW/MIA ACCOUNTING	)	
AGENCY, et al.,	)	
	)	
Defendants.	)	

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

Pursuant to Federal Rule of Civil Procedure 26(c), the Parties jointly request entry of a protective order to limit the disclosure, dissemination, and use of certain identified categories of confidential information that may be disclosed in discovery.

Defendants served a subpoena on one of Plaintiffs' designated expert witnesses, Jonathan Davoren, Director of Applied Research at Bode Cellmark Forensics, seeking documents regarding certain matters referenced in Mr. Davoren's expert report and in his declaration in this case. The Parties agree that certain categories of information responsive to the subpoena should be treated as confidential, protected from disclosure outside this litigation, and used only for purposes of prosecuting or defending this action and any appeals.

The Parties assert in support of their request that protection of the categories of confidential information identified in the proposed Protective Order is appropriate here. The subpoenaed records include genetic information of third parties and business information of a third party client of Bode Cellmark Forensic. These categories of sensitive information should be protected, and can be protected in the manner set forth in the proposed Protective Order

without prejudicing either party.

For the foregoing reasons, the Parties request that the Court grant this joint proposed Protective Order to expedite the production of discovery material in the above-captioned matter (the “Litigation”), facilitate the prompt resolution of disputes over confidentiality, and protect discovery material entitled to be kept confidential.

November 5, 2018

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of November, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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