UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DIANE J. SCHROER, Plaintiff v. JAMES BILLINGTON, Librarian of Congress, Defendant.	)	Civil Action No. 05-1090 (JR)

CONSENT MOTION FOR A PROTECTIVE ORDER
AND MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF

In this case against defendant James Billington, Librarian of Congress, Plaintiff seeks certain information and documents, the release of which would infringe upon the privacy interests of third parties or might otherwise compromise confidentiality. In order to permit the parties to use information relevant to this case without compromising the privacy interests of third parties, Defendant respectfully moves this Court to enter the attached Order protecting the use of certain materials sought by Plaintiff through discovery. Counsel for Plaintiff has reviewed the proposed Order and consents to this Motion.

Respectfully submitted,

/s/ Kenneth L. Wainstein /dvh

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United States Attorney

/s/ Rudolph Contreras /dvh

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/s/ Beverly M. Russell

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of the foregoing ***Consent Motion for a Protective Order and Memorandum of Points and Authorities in Support Thereof*** was made by the Court's Electronic Case Filing System this 8th day of August, 2006 to:

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/s/ Beverly M. Russell

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