UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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

CONSENT MOTION FOR PROTECTIVE ORDER

In this case, Defendant seeks certain information and documents from Plaintiff involving personal and sensitive matters, including matters that implicate national security, and information that implicates the privacy interests of third parties. In order to permit the parties to use information relevant to this case without compromising the privacy interests of Plaintiff and third parties, Plaintiff respectfully moves this Court to enter the attached Order protecting the use of certain materials sought by Defendant in discovery. Counsel for Defendant has reviewed the proposed Order and consents to this Motion.

Respectfully submitted,

/s/ Sharon M. McGowan

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