

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA**

U.S. DOMINION, INC., et al.,

Plaintiffs / Counter-Defendants,

v

PATRICK BYRNE,

Defendant.

Civil Action 1:21-cv-02131 (CJN)

DEFENDANT'S MOTION FOR LEAVE TO FILE
MOTION TO LIFT PROTECTIVE ORDER UNDER SEAL

Comes now Defendant, Patrick Byrne, by and through undersigned and pursuant to Local Rule 5.1(h), hereby files this Motion for Leave to File a Motion to Lift the Protective Order applicable to this case (Docket Entry No. 46) (Attachment 1), under seal per this Court's "Minute Order" issued on Thursday, April, 4, 2024, and also pursuant to this Court's prior instructions in the aforementioned protective order.

Initially, Defendant does not believe that the Motion to Lift the Protective Order must itself be filed under seal, and that, at most, there were only certain

exhibits thereto that were potentially subject to the Court's Protective Order, Attachment 1. In any event, as the latter indicates the parties are to file any references to the protective order ostensibly "under seal," and the Court Rules require a Motion for Leave to file a pleading under seal, Defendant submits this Motion to the Court.

WHEREFORE, for the reasons stated herein, Defendant requests this Honorable Court to allow him to file the Motion to Lift Protective Order under seal, or to otherwise direct the filing of said Motion on the Court's Public Docket.

Respectfully submitted,

/s/ Stefanie Lambert

Stefanie Lambert
Law Offices of Stefanie L. Lambert, PLLC
400 Renaissance Drive, FLOOR 26
Detroit, MI 48243
attorneylambert@protonmail.com

COMPLIANCE WITH LOCAL RULE 7(m)

Counsel for Defendant has discussed the anticipated motion with opposing counsel in a good-faith effort to determine whether there is an opposition to the relief sought, and whether there are any narrow areas of disagreement. Counsel for Plaintiff opposes the motion.

Respectfully submitted,

/s/ Stefanie Lambert

Stefanie Lambert
Law Offices of Stefanie L. Lambert, PLLC
400 Renaissance Drive, FLOOR 26
Detroit, MI 48243
attorneylambert@protonmail.com

CERTIFICATE OF SERVICE

I, Stefanie Lambert, hereby certify that on April 6, 2024, true and correct copies of the foregoing were served via email on counsel of record for every party in *US Dominion, et al. v. Patrick Byrne*, Case No. 1:21-cv-02131 (CJN).

Respectfully submitted,

/s/ Stefanie Lambert

Stefanie Lambert Juntilla
Law Offices of Stefanie L. Lambert, PLLC
400 Renaissance Drive, FLOOR 26
Detroit, MI 48243
attorneylambert@protonmail.com