

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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CENTER FOR BIOLOGICAL DIVERSITY, <i>et</i>))
<i>al.</i> ,))
))
<i>Plaintiffs</i>))
))
v.))
)	Civil Case No. 23-1204
FEDERAL AVIATION ADMINISTRATION,))
<i>et al.</i> ,))
))
<i>Defendants</i>))
))
and))
))
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SPACE EXPLORATION TECHNOLOGIES))
CORP.))
))
))
<i>Defendant-Intervenor.</i>))
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JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to Civil Rule 5.1 of the Rules of the United States District Court for the District of Columbia (“LCvR”) the Parties request that the Court enter the attached Stipulated Protective Order Regarding Confidential Information (“*Protective Order*”) under Fed. R. Civ. P. 26(c).

Good cause exists for the entry of the Protective Order because the Administrative Record (“*AR*”) in this matter contains confidential and sensitive information within the meaning of Rule 26(c). Specifically, certain documents in the AR contain: (a) personal financial, medical, or other private information relating to an individual that properly would be redacted from any public court filing pursuant to Local Rule 5.4(f); (b) a trade secret or other confidential business or commercial information; (c) cultural, historical, or archeological information protected from

Disclosure under the National Historic Preservation Act, 54 U.S.C. § 307103, or the Archaeological Resources Protection Act, 16 U.S.C. § 470hh; (d) source selection or proprietary information; or (e) information protected under the United States' export laws, statutes, and regulations, including the Arms Export Control Act, as amended, 22 U.S.C. § 2751-2999, the International Traffic in Arms Regulations, as amended, 22 C.F.R. Parts 120-130, the Export Administration Act, as amended, 50 U.S.C. §§ 2401-2420, and the U.S. Export Administration Regulations, as amended, 15 C.F.R. § 730, *et seq.*

The proposed Protective Order accordingly provides a mechanism to safeguard the confidentiality of this information, as well as any other sensitive information that may need to be disclosed during the litigation, by limiting its use and disclosure.

Respectfully submitted,

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