

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**MARYLAND SHALL ISSUE, INC., *et al.*,
9613 Harford Rd., Ste C #1015
Baltimore, Maryland 21234-2150,**

Plaintiffs,

No.: 1:22-cv-00865-SAG

v.

**ANNE ARUNDEL COUNTY,
MARYLAND
44 Calvert Street
Annapolis, MD 21401,**

Defendant.

CONSENT MOTION FOR THE ENTRY OF PROTECTIVE ORDER

Plaintiffs respectfully move this Court to enter the accompanying Joint Confidential Discovery Order to govern discovery and confidential material and evidence in the above-captioned matter. Counsel for plaintiffs and counsel for defendants have already signed this proposed order. The proposed order is the standard, model protective order taken *verbatim* from the model order set out at this Court's website.

Respectfully submitted,

/s/ Mark W. Pennak

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on June 16, 2022, a copy of the foregoing CONSENT MOTION FOR THE ENTRY OF PROTECTIVE ORDER and accompanying proposed order were served on the following counsel for defendant Anne Arundel County via ECF service:

Hamilton F. Tyler
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/s/ Mark W. Pennak
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