

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

AMERICAN FEDERATION OF
TEACHERS, et al.,

Plaintiffs,

v.

SCOTT BESSENT, et al.,

Defendants.

Case No. 8:25-cv-430-DLB

**JOINT MOTION FOR ENTRY OF
STIPULATED PROTECTIVE ORDER**

The parties respectfully move for entry of a stipulated protective order in the above-captioned action. The parties agree that there is good cause to issue a protective order to govern the disclosure, use, and handling of a narrow category of information contained in the administrative records that Defendants have been ordered to produce by 5 p.m. on March 7, 2025. Specifically, the proposed stipulated protective order applies to the identities and personally identifiable information of the so-called “DOGE affiliates” as described in the Court’s February 24, 2025 Memorandum Opinion and Order. ECF No. 38. The parties make this request given Defendants’ concerns that identifying those individuals publicly would be an unwarranted invasion of privacy and could lead to potential threats and harassment. In addition, and out of an abundance of caution, Defendants seek to ensure that information contained in the administrative records may be disclosed pursuant to the Privacy Act, 5 U.S.C. § 552a(b)(12). The parties therefore respectfully request that the Court enter the attached proposed protective order. *See* Exhibit 1.

Dated: March 7, 2025

Respectfully submitted,

/s/Xiaonan April Hu

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CERTIFICATE OF SERVICE

I certify that on March 7, 2025, I electronically filed the foregoing and the accompanying attachment, and thereby caused a copy to be served on counsel of record.

/s/ Bradley P. Humphreys
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