

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

BRENNAN M. GILMORE,	:	
	:	Case No. 3:18-cv-00017
Plaintiff,	:	
	:	
v.	:	
	:	
ALEXANDER E. JONES, et al.,	:	
	:	
Defendants	:	
	:	
	:	
<i>In re subpoena to Verizon for the mobile</i>	:	
<i>phone records of journalist Jessica</i>	:	
<i>Bidgood</i>	:	

**OBJECTIONS AND MOTION TO QUASH SUBPOENA TO VERIZON FOR THE
MOBILE PHONE RECORDS OF JOURNALIST JESSICA BIDGOOD**

COMES NOW, by special appearance, non-party journalist Jessica Bidgood, by counsel, pursuant to Rule 45(d)(3) of the Federal Rules of Civil Procedure, and respectfully moves this Court for entry of an Order quashing the subpoena served on Verizon for disclosure of her phone records. That subpoena is attached hereto as Exhibit A.

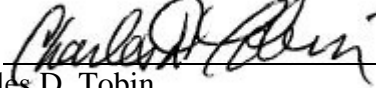
Bidgood, currently a reporter for *The Boston Globe* and formerly a reporter for *The New York Times*, understands that Verizon mailed records responsive to the subpoena to counsel for Defendant James Hoft on July 14 but that Verizon will take steps to stop delivery of the records once it receives notice that this Motion has been filed. Bidgood, who enjoys privileges from compelled disclosure of unpublished journalistic work product under the First Amendment and Virginia’s reporter’s privilege, thus files this Motion on an emergency basis, unaccompanied by a supporting memorandum, which will be filed in due course.

WHEREFORE, Bidgood, appearing specially by counsel, respectfully requests
this Court grant her Objection and Motion to Quash, and quash the subpoena.

Dated: July 14, 2021

Respectfully submitted,

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