

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

BF LABS, INC., et al.

Defendants.

CASE NO. 4:14-cv-00815-BCW

STIPULATED MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff Federal Trade Commission (“FTC”) respectfully moves the Court pursuant to Federal Rule of Civil Procedure 26(c) to enter the proposed Protective Order attached hereto as Exhibit 1. Defendants BF Labs, Inc., Sonny Vleisides, and Darla Drake, stipulate to its entry. Defendant Nasser Ghoseiri does not oppose entry of the protective order and has agreed to abide by it. The proposed protective order, as described in the Joint Proposed Discovery Plan And Scheduling Order (DE #209), protects the interests of the parties and third parties against improper use and disclosure of confidential information, which is limited to sensitive personal information or trade secrets or other confidential research, development, or commercial information.

Respectfully submitted,

JONATHAN E. NUECHTERLEIN
General Counsel

Dated: April 20, 2015

/s/ Leah Frazier
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 20, 2015, a true and correct copy of the foregoing was filed electronically with the United States District Court for the Western District of Missouri using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

/s/ Leah Frazier

Attorney for Plaintiff Federal Trade Commission