

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

LILLIAN BERNIER,

Plaintiff,

v.

TURBOCAM, INC.,

Defendant.

Civil Action No. 1:23-cv-00523-LM-AJ

JOINT MOTION FOR PROTECTIVE ORDER

The parties have agreed to the entry of a Protective Order in the form attached hereto, to protect their privacy and business interests, to the extent possible, in certain documents and information to be produced in discovery in this matter, subject to compliance with the Court's rules and procedures concerning impoundment of documents.

The parties therefore jointly request that the Court enter the attached as an order of the Court.

Respectfully submitted,

PLAINTIFF, LILLIAN BERNIER,
By and through her attorneys,

/s/ Chris Erchull

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DEFENDANT, TURBOCAM, INC.,
By and through its attorneys,

/s/ Bethany P. Minich

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CERTIFICATE OF SERVICE

I, Bethany P. Minich, hereby certify that on April 11, 2025, the foregoing document, filed through the CM/ECF System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Bethany P. Minich
