

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JOSE LEONARDO BRITO GUEVARA,	§	
and BEATRIZ ZULAY GUEVARA	§	
FLORES	§	CIVIL ACTION NO. 3:23-cv-01726-E
<i>Petitioners</i>	§	
v.	§	
	§	
SAMANTHA ESTEFANIA FRANCISCO	§	
CASTRO	§	
<i>Respondent</i>	§	

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Petitioners Jose Leonardo Brito Guevara, and Beatriz Zulay Guevara Flores and Respondent Samantha Estefania Francisco Castro (collectively the “Parties”) respectfully request the entry of a Protective Order. There is good cause for entry of this Order. In this action, the Parties intend to seek “CONFIDENTIAL” and/or “CONFIDENTIAL ATTORNEYS’ EYES ONLY” information from each other during the course of discovery. The disclosure of such confidential information outside the scope of this litigation could result in significant injury to one or more of the Parties’ privacy interests.

For the foregoing reasons, the Parties respectfully request that the proposed Order be entered by the Court.

Dated: September 8, 2023

Respectfully submitted,

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By: /s/ Laura B. Hunt

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**ATTORNEYS FOR RESPONDENT
SAMANTHA ESTEFANIA
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CERTIFICATE OF SERVICE

I hereby certify that this Motion has been served to counsel for all parties via the Court's electronic filing system on September 8, 2023.

/s/ Tracy L. McCreight
Tracy L. McCreight

Joint Motion for Entry of Protective Order

CERTIFICATE OF CONFERENCE

On September 7, 2023, Petitioners' and Respondent's counsel agreed that a Protective Order would protect the interests of all Parties in this matter and have agreed to handle all production pursuant to the terms of this Order.

/s/ Tracy L. McCreight
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