

**UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF ALABAMA  
 SOUTHERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	}	
	}	
<b>Plaintiff,</b>	}	
	}	
<b>v.</b>	}	<b>Case No.: 2:20-cv-01971-RDP</b>
	}	
<b>STATE OF ALABAMA, et al.,</b>	}	
	}	
<b>Defendants.</b>	}	

**ORDER**

On January 27, 2025, the Special Master filed his Report and Recommendation. (Doc. # 231). In the Report, the Special Master recommends that the court grant, in part, Plaintiff’s request for protective order as it relates to the Requests for Production contained in the Williams subpoena and as it relates to any deposition of Williams that would invade Plaintiff’s work product, deliberative process, or other privilege. The Special Master further recommends that the court deny Plaintiff’s request for a protective order to the extent Defendant seeks to depose Williams regarding the facts underlying Plaintiff’s interrogatory responses (responding to contention interrogatories asking for the bases of Plaintiff’s claims), the facts supporting the parties’ claims and defenses, and facts—like those in his emails—about which Williams has personal knowledge.


Plaintiff filed an Objection to the Special Master’s Report and Recommendation Regarding Williams Deposition Subpoena. (Doc. # 237). That Objection has been fully briefed. (Docs. # 242, 245).

After careful and de novo review of the Report and Recommendation and attached exhibits, and the parties’ briefs and attached exhibits, the court **ADOPTS** the Report of the Special Master

and further **ACCEPTS** the recommendation of the Special Master. For the reasons explained fully in the Special Master's Report and Recommendation (Doc. # 231), the court **ORDERS** that:

1. Plaintiff's request for protective order as it relates to the Requests for Production contained in the Williams subpoena and as it relates to any deposition of Williams that would invade Plaintiff's work product, deliberative process, or other privilege is **GRANTED**.
2. Plaintiff's request for a protective order to the extent Defendant seeks to depose Williams regarding the facts underlying Plaintiff's interrogatory responses (responding to contention interrogatories asking for the bases of Plaintiff's claims), the facts supporting the parties' claims and defenses, and facts—like those in his emails—about which Williams has personal knowledge is **DENIED**.

**DONE** and **ORDERED** this February 25, 2025.

  
**R. DAVID PROCTOR**  
CHIEF U.S. DISTRICT JUDGE