

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
Civil Action No.: 3:25-cv-00302-MOC-SCR

BRAD BUMGARDNER, on behalf of)
himself and all others similarly situated,)
)
Plaintiff,)
)
v.)
)
CITY OF GASTONIA,)
)
Defendant.)
)
)

**CONSENT MOTION FOR
PROTECTIVE ORDER**

NOW COME Brad Bumgardner (“Plaintiff”) and the City of Gastonia (“Defendant”) (collectively “the Parties”), by and through the undersigned counsel, and move the Court to enter the proposed Consent Protective Order attached hereto as **Exhibit A**. In support of this Motion, the Parties show unto the Court as follows:

1. Plaintiff has served initial written discovery requests in this matter on Defendant.
2. Plaintiff’s First Set of Interrogatories and Request for Production of Documents to Defendant seek, in relevant part, certain information and documents for which disclosure is governed by N.C.G.S. §§ 160A-168, 132-1.7, and 132-1.4(a), including employee personnel records, and seeks information and documents that are likewise subject to the Health Insurance Portability and Accountability Act (“HIPAA”) Pub. L. 104-191.
3. It is in the best interests of justice, and of the Parties, to have an Order in place as it will allow the parties to ensure the above-described materials are lawfully and properly disclosed and maintained as confidential to the fullest extent possible.

4. The Parties jointly stipulate and consent to the entry of the Proposed Consent Protective Order (submitted via Cyberclerk), attached hereto as **Exhibit A**, and together request that Exhibit A be entered to limit the use of documents produced during the course of litigation, for this case only.
5. This Motion is made in good faith and upon good cause.

WHEREFORE, the Parties jointly request that the Court grant this Motion and enter the attached Protective Order.

Respectfully submitted this the 25th day of September, 2025,

FOR THE PLAINTIFF:

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CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2025, I electronically filed the foregoing ***CONSENT MOTION FOR PROTECTIVE ORDER*** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel of record:

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