

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

REMINGTYN A. WILLIAMS, et al. * **CIVIL ACTION**
VERSUS * **NO. 21-852**
SHAUN FERGUSON, et al * **SECTION "T" (5)**

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**MOTION FOR PROTECTIVE ORDER BY THE JEFFERSON PARISH
SHERIFF JOSEPH P. LOPINTO, III**

NOW INTO COURT, through undersigned counsel, comes Defendant, Sheriff Joseph P. Lopinto, III, in his official capacity as Sheriff of Jefferson Parish ("the Sheriff"), and respectfully moves this Honorable Court for a protective order pursuant to Fed. R. Civ. P. 26(c). Specifically, the Sheriff respectfully requests that Court issue a protective order, ordering that discovery be forbidden pursuant to Fed. R. Civ. P. 26(c)(1)(A) or, alternatively, that same be limited pursuant to Fed. R. Civ. P. 26(c)(1)(D).

WHEREFORE, the Sheriff respectfully prays that Court issue a protective order, ordering that discovery be forbidden pursuant to Fed. R. Civ. P. 26(c)(1)(A) or that same be limited pursuant to Fed. R. Civ. P. 26(c)(1)(D) in the manner set forth above and in the attached Memorandum in Support of this Motion.

Respectfully submitted,

/s/ Daniel R. Martiny

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing pleadings has been forwarded to all parties via electronic CM/ECF filing and/or by depositing a copy of same in the U.S. Mail, postage prepaid this 30th day of September 2022.

/s/ DANIEL R. MARTINY

DANIEL R. MARTINY