

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

MALIBU MEDIA, LLC,)	
)	
Plaintiff,)	Civil Case No. <u>1:12-cv-00842-TWP-MJD</u>
)	
v.)	
)	
STEPHEN MCSWEENEY, CHARLIE)	
TOLLEY, JEREMIAH MCKINNEY, JAMES)	
HELPERICH, ERNEST NURULLAEVA and)	
JOHN DOE 1 and 7,)	
)	
Defendants.)	
)	

JOINT MOTION FOR ENTRY OF A STIPULATED PROTECTIVE ORDER

Plaintiff, Malibu Media, LLC (“Plaintiff”), and Defendant, James Helferich (“Defendant”), by and through respective counsel, hereby move this Court for the entry of the Stipulated Protective Order attached hereto as Exhibit A, and state:

1. Discovery in this action will include the disclosure of records and information which are private and confidential.
2. This stipulation is intended by the parties to facilitate the early exchange of documents without the necessity of court intervention.
3. The parties have agreed to be bound by the terms and conditions of the Stipulated Protective Order attached hereto as Exhibit A and request that it be entered by the Court.

WHEREFORE, the parties jointly request that the Court formally adopt and enter the Stipulated Protective Order attached hereto as Exhibit A.

Dated: August 16, 2013

Respectfully submitted,

/s/ Paul J. Nicoletti

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CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2013, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Paul J. Nicoletti