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

TNA Entertainment, LLC,	)
Plaintiff,	)
v.	)
Charles "Carlos" Ashenoff,	)
Defendant,	) CIVIL ACTION NO.: 3:08-CV-522-B
v.	)
Jeffrey L. Jarrett, Dixie Carter, Paul	)
W. Taylor III (p/k/a Terry Taylor),	)
and Wayne Keown (p/k/a Dutch	)
Mantel),	)
Third-Party Defendants.	,

## DEFENDANT ASHENOFF'S OPPOSED MOTION FOR PROTECTIVE ORDER

Pursuant to to Federal Rule of Civil Procedure 26(c) and Local Rule § 7.1, Defendant Charles Ashenoff ("Ashenoff") hereby files this Opposed Motion for Protective Order for an in camera inspection of work product documents. In support of this Motion, Ashenoff relies on the Brief in Support of Opposed Motion for Protective Order and any and all orders, pleadings and exhibits of record.

Respectfully submitted this 11th day of March, 2009.

\_\_\_\_\_\_/s/ Cary Ichter Cary Ichter, Esq. Georgia Bar No. 382515

ADORNO & YOSS, LLC Two Midtown Plaza, Suite 1500 1349 West Peachtree Street Atlanta, Georgia 30309 T: 404-347-8300

COUNSEL FOR DEFENDANT CHARLES ASHENOFF

F: 404-347-8395

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **DEFENDANT ASHENOFF'S OPPOSED** MOTION FOR PROTECTIVE ORDER was electronically filed with the clerk of court using the ECM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record, including:

> Richard S. Krumholz, Esq. FULBRIGHT & JAWORSKI, LLP 2200 Ross Avenue, Suite 2800 Dallas, Texas 75201-2784

Robert Blackwell, Esq. **BROWN & HOFMEISTER, LLP** 740 E. Campbell Road, Suite 800 Richardson, Texas 75081

This 10th day of March, 2009.

\_/s/ Cary Ichter\_\_\_\_ Cary Ichter, Esq.

Georgia Bar No. 382515