

THE HONORABLE JAMES L. ROBERT

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ATIGEO LLC, a Washington limited liability  
company, and MICHAEL SANDOVAL,  
an individual; and

Plaintiffs,

vs.

OFFSHORE LIMITED D, a California  
partnership; DENNIS MONTGOMERY,  
individually and as a partner of Offshore  
Limited D; ISTVAN BURGYN,  
individually and as a partner of Offshore  
Limited D; DEMARATECH, LLC,  
a California limited liability company; and  
DOES 1-25, inclusive;

Defendants.

Civil Action No. 2:13-cv-1694-JLR.

**PRAECIPE TO PLAINTIFFS' MOTION  
FOR MUTUAL PROTECTIVE ORDER  
GOVERNING DISCOVERY**

NOTED ON MOTION CALENDAR:  
March 28, 2014

Plaintiffs Atigeo LLC and Michael Sandoval hereby submit the following praecipe to the motion for mutual protective order governing discovery (Dkt # 50) in this action and the proposed protective order (Dkt # 50-1), as follows.

1. On March 20, 2014, the Individual Defendants' counsel clarified that Defendant Montgomery is not himself the target of the ongoing criminal investigation by the unnamed government law enforcement agency, just that his documents and computers were seized thereby. Based on this representation and in the absence of discovery, Plaintiffs file this praecipe to correct

1 the record, including lines 12-14 of page 7 of Plaintiffs' motion for protective order. Even so, the  
2 arguments in Plaintiffs' motion apply with equal force.

3 2. Plaintiffs also submit a revised proposed protective order (attached hereto as  
4 Exhibit 1) to replace the proposed protective order filed at Dkt # 50-1. The revised proposed  
5 protective order shows a redline in paragraph 14 to provide for the situation where, if a third party  
6 subpoenaed person or entity discloses Confidential or AEO information belonging to one of the  
7 parties *without designating it as such under protective order*, the owner of that information may  
8 designate the information after the disclosure.

9 DATED this 21st day of March, 2014.

10 Respectfully Submitted,

11 STOEL RIVES LLP

12 /s/ Brian C. Park

13 Brian C. Park, WSBA No. 25,584  
14 Maren R. Norton, WSBA No. 35,435  
15 Hunter Ferguson, WSBA No. 41,485  
16 600 University Street, Suite 3600  
17 Seattle, WA 98101  
18 Telephone: (206) 386-7542  
19 Facsimile: (206) 386-7500  
20 BCPark@stoel.com  
21 MRNorton@stoel.com  
22 HOFerguson@stoel.com

23 Counsel for Plaintiff Atigeo LLC

24 BARON & BUDD, P.C.

25 /s/ Roland K. Tellis

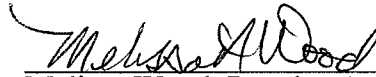
26 Roland K. Tellis (*Pro Hac Vice*)  
15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: (818) 839-2333  
Facsimile: (818) 986-9698  
RTellis@baronbudd.com

Counsel for Plaintiffs  
Atigeo LLC and Michael Sandoval

**CERTIFICATE OF SERVICE**

I hereby certify that on March 21, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record in the above case.

STOEL RIVES LLP



Melissa Wood, Practice Assistant  
Dated March 21, 2014

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