IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Consumer Financial Protection Bureau, Plaintiff, v. Frederick J. Hanna & Associates, P.C., Frederick J. Hanna, individually, Joseph C. Cooling, individually, and Robert A. Winter, individually, Defendants.	Civil Action No. 1:14-CV-02211-AT

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff Consumer Financial Protection Bureau and Defendants Frederick J. Hanna & Associates, P.C., Frederick J. Hanna, Joseph C. Cooling, and Robert A. Winter jointly move for an entry of a stipulated protective order in this matter. The requested protective order will facilitate discovery and maintain confidentiality of materials containing proprietary information, trade secrets, and/or other confidential or commercially sensitive information.

The parties hereby agree to and consent to the entry of the proposed Stipulated Protective Order, attached hereto as Exhibit A, and request that the Court enter such order.

Dated: September 2, 2015

Respectfully submitted,

/s/ Stefanie H. Jackman
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JOHN A. HORN
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CERTIFICATE OF COMPLIANCE WITH LR 5.1

I hereby certify that this pleading was prepared and filed using the font Times New Roman (14pt) and is otherwise formatted in compliance with L.R. 5.1.

Dated: August 25, 2015

Respectfully submitted,

/s/ Stefanie H. Jackman
Stefanie H. Jackman
Georgia Bar No. 335652

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of September, 2015, 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 attorneys of record.

/s/ Stefanie H. Jackman
Stefanie H. Jackman
GA Bar 335652

Counsel for Defendants