



meaning of Rule 26(c) of the Federal Rules of Civil Procedure and which should be protected by way of appropriate protective order.

3. The Parties desire to prevent unnecessary dissemination or disclosure of the confidential information. Based upon the foregoing, the Parties agree to abide by the provisions and protection set forth in the proposed Protective Order attached as **Exhibit A**.

WHEREFORE, the Parties respectfully request this Court to grant the instant Motion and enter the proposed Protective Order attached hereto as **Exhibit A**.

This the 28th day of September, 2017.

RESPECTFULLY SUBMITTED,

s/Thomas H. Castelli

Thomas H. Castelli (#024849)  
ACLU Foundation of Tennessee  
P.O. Box 120160  
Nashville, Tennessee 37212  
(615) 320-7142  
E-mail: [tcastelli@aclu-tn.org](mailto:tcastelli@aclu-tn.org)

*Counsel for Plaintiff*

s/Jennie Vee Silk

Buckner Wellford (#TN 9687)  
Thomas Parker (#TN 13908)  
Jennie Vee Silk (#TN 35319)  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.  
165 Madison Avenue, Suite 2000  
Memphis, Tennessee 38103  
Telephone: 901.577.2152  
Fax: 901.577.0786  
Email: [bwellford@bakerdonelson.com](mailto:bwellford@bakerdonelson.com)  
[tparker@bakerdonelson.com](mailto:tparker@bakerdonelson.com)  
[jsilk@bakerdonelson.com](mailto:jsilk@bakerdonelson.com)

*Counsel for Defendant, The City of Memphis*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 28th, 2017, the foregoing will be served this Court's ECF System to:

Thomas H. Castelli  
ACLU Foundation of Tennessee  
P.O. Box 120160  
Nashville, Tennessee 37212

s/Jennie Vee Silk \_\_\_\_\_