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Of Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DISTRICT**

**CHIXAPKAID DONALD MICHAEL
PAVEL;**

Plaintiff,

v.

**UNIVERSITY OF OREGON; DOUG
BLANDY; PENELOPE DAUGHERTY;
ANNIE BENTZ; RANDY KAMPHAUS;
JULIET A. BAXTER; JANNE
UNDERRINER; JASON YOUNKER; and
BRIAN KLOPOTEK;**

Defendants.

Case No. 6:16-CV-00819-AA

**DEFENDANTS' MOTION FOR
ENTRY OF STIPULATED
PROTECTIVE ORDER**

LR 7-1 CERTIFICATION

Counsel for Defendants certifies that she has conferred with counsel for Plaintiff, and Plaintiff has stipulated to this motion.

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MOTION

Defendants move the Court for entry of the accompanying stipulated protective order maintaining the confidentiality of certain student and faculty records.

This action involves the termination of a University faculty member. The parties expect to exchange documents and information relating to confidential student and University faculty information. In order to protect these non-party individuals from annoyance, embarrassment, oppression or an undue burden, entry of the accompanying Stipulated Protective Order (“Protective Order”) is warranted.

This motion is based upon Fed.R.Civ.P. 26(c), LR 26-4, and the declaration of Amanda M. Walkup. This motion is made in good faith and not for the purpose of delay.

DATED: February 7, 2017.

HERSHNER HUNTER, LLP

By /s/ *Amanda M. Walkup*
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