

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

VOTER REFERENCE FOUNDATION,)
LLC,)
)
Plaintiff,)
v.)

CASE NO: 1:22-cv-00222-JB-KK

HECTOR BALDERAS, in his official)
capacity as New Mexico Attorney General, and)
MAGGIE TOULOUSE OLIVER, in her)
Official capacity as New Mexico)
Secretary of State,)
)
Defendants.)

**PLAINTIFF’S UNOPPOSED MOTION FOR ENTRY OF
AGREED UPON PROTECTIVE ORDER**

Plaintiff Voter Reference Foundation (“Plaintiff”), by and through its counsel of record, and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, hereby moves the Court to enter the “Agreed Protective Order for Confidential and Proprietary Information” attached hereto as Exhibit A. In support of this unopposed Motion, Plaintiff states:

1. This case will involve documents that include private corporate records and other private confidential information of the Plaintiff, Defendants, and/or third parties.
2. Absent protection, dissemination of this information would make sensitive personal and commercial information available to the public.
3. The Parties believe that this Agreed Protective Order is necessary to protect Plaintiff, Defendants, and third parties’ personal, confidential, and commercial information, to expedite the flow of discovery material, and to preserve the confidentiality of certain documents and information.

4. Plaintiff's Counsel has conferred with counsel for Defendants Hector Balderas and Maggie Toulouse Oliver. Defendants' counsel has agreed to the terms of the proposed protective order.

Because the Parties are in agreement that the proposed Agreed Protective Order is necessary and good cause exists for its entry, VRF respectfully requests that this motion be granted and that the Court enter the attached protective order.

Respectfully submitted this 16th day of January, 2023.

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Counsel for Plaintiff VRF

CERTIFICATE OF SERVICE

I, Edward D. Greim, certify that on January 16, 2023, a copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system, which sent notification to the following counsel of record via e-mail:

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Dated: January 16, 2023

/s/ Edward D. Greim
Edward D. Greim
Counsel for Plaintiff

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