## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Norfolk Division

FELD ENTERTAINMENT, INC.,

.

Plaintiff,

:

v. : CIVIL ACTION NO. 2:08mc04

PEOPLE FOR THE ETHICAL TREATMENT:

OF ANIMALS, INC.,

:

Defendant. :

## **DEFENDANT'S MOTION FOR A PROTECTIVE ORDER**

Defendant, People for the Ethical Treatment of Animals, Inc. ("PeTA"), hereby moves this Court, pursuant to Fed. R. Civ. P. 26(c), for a protective order to stay the effect of the Order of Magistrate Judge Stillman, dated July 22, 2008, pending this Court ruling on PeTA's objections to that order. The grounds for PeTA's motion are set forth in the accompanying memorandum.

## CERTIFICATE OF GOOD FAITH

Prior to filing this motion, on August 8, 2008, counsel for PeTA conferred with counsel for FEI in an attempt to resolve the dispute without court action. The parties were not able to successfully resolve their dispute.

Respectfully submitted,

By \_\_\_\_\_\_/s/ PHILIP J. HIRSCHKOP Virginia State Bar No. 04929 HIRSCHKOP & ASSOCIATES, P.C. 908 King Street, Suite 200 Alexandria, Virginia 22314-3067 Phone: (703) 836-6595 Facsimile: (703) 548-3181 <u>HirschkopLaw@aol.com</u> Counsel for Defendant PeTA

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the  $8^{th}$ , day of August, 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following.

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