

IN THE COURT OF COMMON PLEAS OF THE 12TH JUDICIAL DISTRICT
DAUPHIN COUNTY, PENNSYLVANIA

U.S. Law Shield of Pennsylvania,	:	2015-cv-255
Ex rel. Todd Hoover; and Justin J. McShane,	:	
Plaintiffs	:	Civil Action – Equity
v.	:	
City of Harrisburg; Mayor Eric Papenfuse;	:	Jury Trial Demanded
Wanda Williams, Sandra Reid,	:	
Brad Koplinski, Ben Alatt, Jeff Baltimore,	:	
Susan Wilson, Shamaine Daniels,	:	
Harrisburg City Council Members; and	:	
Chief of Police Thomas Carter,	:	
Defendants	:	

Order

This Honorable Court grants a protective order to Defendants, and prevents Plaintiffs from taking the deposition of Defendant Jeff Baltimore

By the Court:

Dated: March __, 2015

Distribution:

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2015 MAR 17 PM 2:30
CLERK OF COURT
DAUPHIN COUNTY
PENNSYLVANIA

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Susan Wilson, Shamaine Daniels,	:
Harrisburg City Council Members; and	:
Chief of Police Thomas Carter,	:
Defendants	:

Defendants' Motion for Protective Order

All Defendants ask this Court for a protective order from the deposition of
Councilman Jeff Baltimore:

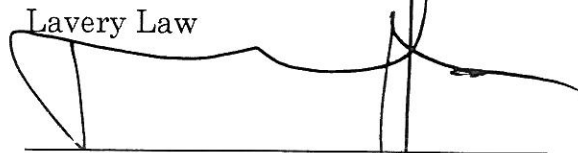
1. On February 25th, this Court granted in part and denied in part
Plaintiffs' motion for a preliminary injunction.

2. Defendants are currently preparing a motion for reconsideration.
3. Defendants thereafter will appeal to the Commonwealth Court as a motion for reconsideration does not toll the 30 day appeal deadline (March 27th).
4. Defendants will ask this Court to stay this case during the appeal as the Commonwealth Court's ruling in this case will define the scope of the case.
5. Plaintiffs have noticed the deposition of Councilman Jeff Baltimore for this Thursday, March 19th.
6. All counsel agreed in Chambers that such discovery was unnecessary in this case.
7. Further, Councilman Baltimore did not vote for *any* of the ordinances at issue as all of them pre-date his term of service.
8. Defendants do not believe that oral argument or an evidentiary hearing are necessary, but defer to this Court as to whether this Court would like testimony or oral argument on the matter.
9. Discovery is not necessary for the resolution of this motion.

For these reasons, Defendants respectfully request this Honorable Court grant them a protective order from the deposition of Councilman Jeff Baltimore.

Respectfully submitted,

Lavery Law

A handwritten signature in black ink, appearing to read 'Frank J. Lavery', is written over a horizontal line. The signature is stylized with a large, sweeping 'F' and a long, horizontal stroke extending to the right.

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Dated: March 17, 2015

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DAUPHIN COUNTY, PENNSYLVANIA

U.S. LAW SHIELD OF PENNSYLVANIA, LLC,	:	
EX REL. TODD HOOVER;	:	NO. 2015-CV-255-EQ
JUSTIN J. MCSHANE, AN INDIVIDUAL,	:	
PLAINTIFFS	:	CIVIL ACTION EQUITY
	:	
V.	:	JURY TRIAL DEMANDED
	:	
CITY OF HARRISBURG;	:	
MAYOR ERIC PAPENFUSE;	:	
WANDA WILLIAMS,	:	
SANDRA REID,	:	
BRAD KOPLINSKI,	:	
BEN ALATT,	:	
JEFF BALTIMORE,	:	
SUSAN WILSON,	:	
SHAMAINE DANIELS,	:	
HARRISBURG CITY COUNCIL MEMBERS;	:	
AND THOMAS CARTER, CITY OF	:	
HARRISBURG CHIEF OF POLICE,	:	
DEFENDANTS	:	

CERTIFICATION PURSUANT TO DAUPHIN COUNTY LOCAL RULE 208.2(d)

We hereby certify that on March 17, 2015, disclosed the substance and full text of the foregoing Motion for Protective Order to the Plaintiffs, via counsel, Justin J. McShane.

As of the time of the filing of the instant Motion, Attorney McShane has not provided his position.

Respectfully submitted,

Lavery Law



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Attorneys for Defendants

Dated: March 17, 2015

Certificate of Service

I certify that on March 17, 2015, I served a true and correct copy of this filing via U.S. First Class mail, postage prepaid, and by e-mail addressed as follows:

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