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7 JAIME MCGUIRE (sued as Jamie McGuire),  
and KENNETH HUNTER  
8

9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**  
11 **LOS ANGELES DIVISION**

12 JUDY ANNE MIKOVITS,  
13 Plaintiff,

14 v.

15 ADAM GARCIA, JAMIE MCGUIRE,  
16 RICHARD GAMMICK, GEOFF DEAN,  
THREE UNIDENTIFIED VENTURA  
17 COUNTY DEPUTY SHERIFFS, F.  
HARVEY WHITTEMORE, ANNETTE  
18 F. WHITTEMORE, CARLI WEST  
KINNE, WHITTEMORE-PETERSON  
19 INSTITUTE, a Nevada corporation,  
UNEVX INC., a Nevada corporation,  
20 MICHAEL HILLERBY, KENNETH  
HUNTER, GREG PARI and VINCENT  
21 LOMBARDI,  
22 Defendants.

Case No. CV14-08909 SVW (PLA)

**UNOPPOSED EX PARTE  
APPLICATION FOR PROTECTIVE  
ORDER TO RESTRICT ACCESS  
TO FILED DOCUMENTS  
CONTAINING PERSONAL DATA  
IDENTIFIERS; DECLARATION OF  
ROBERT M. DATO**

(Filed concurrently with proposed order)

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**COMPLIANCE WITH LOCAL RULE 7-19**

In compliance with Local Rule 7-19, defendants Adam Garcia, Jaime McGuire (sued as Jamie McGuire) and Kenneth Hunter (collectively the UNR defendants) set forth the name, address, telephone number and e-mail address of counsel for all other parties as follows:

Attorneys for Plaintiff:

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Attorneys for Defendant Richard Gammick:

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**SUPPORTING MEMORANDUM**

The UNR defendants hereby apply to the Court ex parte for an unopposed protective order to restrict public access to filed documents containing personal data identifiers for Plaintiff Judy Anne Mikovits – Docket No. 113-1, pg. 6. Defendants further request the Court to authorize redaction of the personal data identifiers from Docket No. 113-1, pg. 6 (birthdate and social security number) and direct the clerk of the court to restrict public access to this document as originally filed, so that the personal data identifiers are not available to public access.

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Docket No. 113-1, page 6, was filed on August 31, 2015 and inadvertently contained personal data identifiers of Plaintiff. Public disclosure of these personal data identifiers would create undue risk of identity theft or other unlawful injury to Plaintiff.

As set forth in the attached declaration of Robert M. Dato, no party opposes this application.

The UNR defendants therefore respectfully request that this Court issue the concurrently-filed proposed order to ameliorate any harm caused by the unintentional disclosure of plaintiff’s personal information.

DATED: November 20, 2015

BUCHALTER NEMER  
A Professional Corporation

By: /s/ Robert M. Dato  
Robert M. Dato  
Sarah A. Syed

Attorneys for Defendants  
ADAM GARCIA, JAIME MCGUIRE, and  
KENNETH HUNTER

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**DECLARATION OF ROBERT M. DATO**

I, the undersigned Robert M. Dato, declare as follows:

1. I am an attorney at law admitted to this Court. I am employed by Buchalter Nemer, PC, counsel of record for defendants Adam Garcia, Jaime McGuire, and Kenneth Hunter in this action. I have personal knowledge of the facts contained in this declaration and am competent to testify about them.

2. On August 31, 2015, I filed on behalf of my clients a request for judicial notice in support of my clients’ motion to dismiss. Page 6 of that document (Dock. No 113-1) is a copy of a request for extradition that contains the social security number and birthdate of plaintiff Judy Mikovits. I did not notice this information when the request for judicial notice was filed. I would have redacted this information had I noticed.

3. On November 19, 2015, I received an e-mail from plaintiff’s counsel (Michael Hugo) alerting me to the above situation.

4. On November 20, 2015, at 11:21 a.m., I contacted counsel for all parties to this case by e-mail, advising them of the situation and asking whether any party would oppose this ex parte application for protective order. Counsel for all parties advised that there would be no opposition.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed at Irvine, California on November 20, 2015.

/s/Robert M. Dato  
Robert M. Dato