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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

CRUISE LINES INTERNATIONAL ASSOCIATION ALASKA, et al.,

Plaintiffs,

V.

THE CITY AND THE BOROUGH OF JUNEAU, ALASKA, et al.,

Defendants.

Case No. 1:16-cv-00008-HRH

JOINT MOTION FOR ENTRY OF STIPULATION AND PROTECTIVE ORDER GOVERNING THE PRODUCTION AND EXCHANGE OF CONFIDENTIAL INFORMATION

6477087.1

Plaintiffs Cruise Lines International Association Alaska and Cruise Lines International

Association (collectively, "Plaintiffs") and Defendants the City and the Borough of Juneau,

Alaska and Rorie Watt, in his official capacity as City Manager (together "CBJ" or

"Defendants"), by and through counsel, pursuant to Fed. R. Civ. P. 26(c), respectfully move for

entry of the attached Stipulation and Protective Order Governing the Production and Exchange

of Confidential Information. See EXHIBIT 1. The Protective Order is necessary to protect

confidential, proprietary, and highly sensitive information (including but not limited to

personally identifiable information) produced by the parties concerning the matters at issue in

this litigation.

Respectfully submitted,

DATED: December 8, 2016

By: /s/ C. Jonathan Benner

C. Jonathan Benner (pro hac vice) Kathleen E. Kraft (pro hac vice) THOMPSON COBURN LLP

Herbert H. Ray, Jr. (Alaska Bar No. 8811201) KEESAL, YOUNG & LOGAN, LLC

Attorneys for Plaintiffs Cruise Line International Association Alaska and Cruise Lines International Association

DATED: December 8, 2016

By: /s/

Robert P. Blasco, AK Bar # 7710098 HOFFMAN & BLASCO, LLC

Attorneys for the Defendants The City and Borough of Juneau, Alaska, a municipal corporation, and Rorie Watt, in his official capacity as City Manager

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CERTIFICATE OF SERVICE

I certify that on December 8, 2016, I caused a true and correct copy of the foregoing document to be filed using the Court's Electronic Case Files System ("ECF"). The document is available for review and downloading via the ECF system, and will be served by operation of the ECF system upon all counsel of record.

/s/ C. Jonathan Benner C. Jonathan Benner

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