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12 **MONTANA SIXTH JUDICIAL DISTRICT COURT, PARK COUNTY**

12 DANIEL K. O'CONNELL and VALERY A.
13 O'CONNELL,

14 Plaintiffs,

15 v.

16 GLASTONBURY LANDOWNERS
17 ASSOCIATION, INC. & Current GLA Board
of Directors,

18 Defendants.

Cause No.: DV-2011-114
Judge David Cybulski

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

19 COMES NOW the above named Defendant Glastonbury Landowners Association, Inc. (GLA)
20 by and through their counsel of record, and moves this Court for a Protective Order pursuant to Mont.
21 R. Civ. P. 26(c) requiring Plaintiffs use the formal discovery process, prohibiting improper *
22 communications between the parties, prohibiting requests for previously provided information and
23 documents, ordering the destruction and takedown of a closed session board meeting recording, and
24 ordering the return of GLA documents taken by Plaintiffs. The GLA further moves this Court for an
25 award of its attorney fees and costs incurred in bringing this Motion.
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1 Defendant GLA certifies that it conferred in good faith with Plaintiffs to resolve this dispute but
2 have been unable to do so. A brief in support of this Motion has been concurrently filed.

3 DATED this 27th day of July, 2015.

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9 BY 

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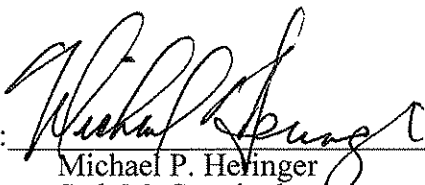
1 CERTIFICATE OF SERVICE

2 I hereby certify that a true and correct copy of the foregoing was duly served by U.S. mail,
3 postage prepaid, and addressed as follows this 27th day of July, 2015:

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