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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JAMES H. LESAR,)
)
 Plaintiff,)
)
 v.)
)
 UNITED STATES DEPARTMENT)
 OF JUSTICE,)
)
 Defendant.)
)
 _____)

Civil Action No. 82-3600

MOTION FOR PROTECTIVE ORDER STAYING DISCOVERY

Defendant respectfully moves the Court for a protective order staying discovery in this action.

In support of this motion, defendant files a memorandum of points and authorities. That memorandum also replies to plaintiff's opposition to defendant's motion for summary judgment and responds to plaintiff's motion to strike the declaration of Special Agent John N. Phillips.

Defendant also files herewith the affidavits of Willis A Newton and Brian Scott Kinsey.

Two proposed orders are submitted herewith.^{1/}

Respectfully submitted,

STANLEY S. HARRIS
United States Attorney

^{1/} The depositions noticed by plaintiff are presently scheduled to begin April 15, 1983. Two proposed orders are submitted herewith: one would finally dispose of all three motions; the other would stay all discovery, including the depositions, pending further order of the Court.

ROYCE C. LAMBERTH
Assistant United States Attorney

NATHAN DODELL
Assistant United States Attorney

CERTIFICATE OF SERFICE

I hereby certify that arrangements have been made with plaintiff, pro se, James H. Lesar, Esquire, 1231 Fourth Street, S.W., Washington, D.C. 20024 this 18th day of March, 1983, that he will call for a copy of the foregoing motion for a protective order staying discovery, affidavits of Willis A. Newton and Brian Scott Kinsey, memorandum of points and authorities and two proposed orders.

NATHAN DODELL
Assistant United States Attorney
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