

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

LAUREN HAIDON : NO.: 3:19-cv-00119 (SRU)
 :
v. :
 :
TOWN OF BLOOMFIELD, PAUL HAMMICK, :
BRENDAN DANAHER, ZACHARY :
KLOMBERG, MATTHEW SUPLEE AND :
OTHER KNOWN OR UNKNOWN OFFICERS :
OF THE BLOOMFIELD POLICE :
DEPARTMENT : JUNE 22, 2021

MOTION FOR PROTECTIVE ORDER

Pursuant to Fed.R.Civ.P. 26(c), the defendant, **Brendan Danaher** (“defendant”), and non-party deponent employees of the Town of Bloomfield and members of the Bloomfield Police Department, **Paul Hammick, Zachary Klomberg** and **Matthew Suplee**, hereby move for an order of protection with respect to their depositions which took place on May 26th and 27th, respectively, as follows: An order preventing plaintiff’s counsel or the plaintiff, Lauren Haidon, from using, disseminating and/or publishing any transcript and/or video and/or audio recording of the depositions to third-parties and/or limiting the use of the video and/or audio recordings of the depositions to the prosecution and defense of the instant matter.

The defendant and said employees of the Town of Bloomfield submit in support of this motion that good cause exists for the requested order. Pursuant to Local Rule 7, a Memorandum of Law accompanies this motion.

WHEREFORE, defendant, **Brendan Danaher**, and non-party deponents, **Paul Hammick, Zachary Klomberg** and **Matthew Suplee**, respectfully request that the Court grant their Motion for Protective Order as set forth herein.

DEFENDANT,
BRENDAN DANAHER

By /s/ Kristan M. Maccini
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CERTIFICATION

This is to certify that on **June 22, 2021**, a copy of the foregoing **Motion for Protective Order** was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

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