

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CIVIL ACTION NO. 1:12-CV-818**

EQUAL EMPLOYMENT)
OPPORTUNITY COMMISSION,)
)
Plaintiff,)
)
v.)
)
)
BRITTHAVEN, INC. d/b/a)
BRITTHAVEN OF HENDERSON)
and PRINCIPLE LONG TERM)
CARE, INC. d/b/a KERR LAKE)
NURSING & REHABILITATION)
CENTER,)
)
Defendant.)
)

JOINT MOTION FOR ENTRY OF CONSENT PROTECTIVE ORDER

Plaintiff Equal Employment Opportunity Commission and Defendants Britthaven, Inc. and Principle Long Term Care, Inc., by counsel, move the Court to enter a Consent Protective Order in this action. The Consent Protective Order has been agreed upon by the parties and is submitted herewith. The undersigned certifies that she has communicated with counsel for Defendant, and that counsel consents to the filing of this motion.

This the 22nd day of May, 2013.

Respectfully Submitted,

P. DAVID LOPEZ

General Counsel

JAMES L. LEE
Deputy General Counsel

GWENDOLYN YOUNG REAMS
Associate General Counsel

LYNETTE A. BARNES
Regional Attorney

TINA BURNSIDE
Supervisory Trial Attorney

/s/ Zoë G. Mahood
ZOË G. MAHOOD
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ATTORNEYS

FOR THE PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2013, I electronically filed the foregoing Motion for Entry of Joint Consent Protective Order with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Gregory
Raleigh,

P. McGuire
Margaret S. Scholz
4208 Six Forks Road, Suite 1100
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Respectfully submitted,

/s/ Zoë G. Mahood
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