

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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MASSACHUSETTS BAY  
TRANSPORTATION AUTHORITY

Plaintiff

v.

Civil Action No. 08-11364-GAO

ZACK ANDERSON, RJ RYAN,  
ALESSANDRO CHIESA, and the  
MASSACHUSETTS INSTITUTE OF  
TECHNOLOGY

Defendants

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**PLAINTIFF'S MOTION FOR INTERIM PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff Massachusetts Bay Transportation Authority requests that this Court grant Plaintiff's Motion for Interim Protective Order. As grounds for this Interim Protective Order, Plaintiff states that it served to Defendant's counsel discovery requests on August 13, 2008, at 2:36 pm via email. Moreover, any such discovery should take place under the protection of this Interim Protective Order.

Attached to this Motion for Interim Protective Order is the Interim Protective Order that Plaintiff revised to apply only to the Preliminary Injunction discovery, which was done in light of the time that Defendant has to consider the terms of the Protective Order.

To allow discovery to proceed, Plaintiff respectfully requests the Court to allow entry of the Interim Protective Order.

MASSACHUSETTS BAY TRANSPORTATION  
AUTHORITY

By its attorneys,

/s/ Maximillian J. Bodoïn  
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AUTHORITY  
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Dated: August 14, 2008  
Boston, Massachusetts

CERTIFICATE OF SERVICE

I, Ieuan G. Mahony, Attorney for the Massachusetts Bay Transportation Authority in connection with the above- captioned proceedings, hereby certify that on this 14<sup>th</sup> day of August, 2008, I served the foregoing **Plaintiff's Motion for Protective Order** by e-mail upon the following interested persons:

**Party**

**Counsel**

Zack Anderson, RJ Ryan,  
and Alessandro Chiesa  
(the "MIT Undergrads")

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/s/ Ieuan G. Mahony \_\_\_\_\_