**INSTRUCTIONS REGARDING THE FILING OF MOTIONS**

**SEEKING ENTRY OF AN AGREED PROTECTIVE ORDER**

Requests for entry of an agreed protective order shall be accompanied by a motion requesting the entry of such an order. Unless the parties agree there are compelling reasons for a departure, motions for entry of an agreed protective order in cases assigned to Magistrate Judge Dinsmore should follow the Court’s Uniform Stipulated Protective Order, which may be found on the Court’s website ([www.insd.uscourts.gov](http://www.insd.uscourts.gov)). The parties should also replace the text of Section VIII of the Court’s Uniform Stipulated Protective Order with the following language:

VIII. **REQUESTS TO SEAL**

A. Filing Documents Under Seal: The parties shall comply with Local Rule 5-11 when filing material designated as protected information pursuant to this order, with the following exceptions:

1. If the filing party did not designate the subject information confidential, the filing party need not file a redacted version of the document as required by Local Rule 5-11(d)(2)(B).

2. The designating party(ies) identified according to Local Rule 5-11(d)(2)(A)(ii) must, within 14 days of service of the Motion to Maintain Document(s) Under Seal, also file a redacted (confidential portions blacked out) public version of any document that is sought to be maintained under seal.

Over-redaction of documents sought to be maintained under seal may result in the denial of a motion to seal.

B. Challenging "Confidential" or “Attorneys’ Eyes Only” Designations: Prior to the filing of any motion seeking to challenge the designation of information as "Confidential" or “Attorneys’ Eyes Only” as set forth in Section IV above, the parties will request a telephonic conference with the Magistrate Judge to discuss the issue, following which the contesting party may move for an order removing or altering the "Confidential" or “Attorneys’ Eyes Only” designation with regard to such document(s).