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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MASSACHUSETTS**

Three Angels Broadcasting Network, Inc.,  
an Illinois non-profit corporation, and  
Danny Lee Shelton, individually,

Case No. 07-40098-FDS

Plaintiffs,

v.

Gailon Arthur Joy and Robert Pickle,

Defendants.

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**NOTICE OF MOTION AND MOTION FOR PROTECTIVE ORDER**  
**AND REQUEST FOR ORAL ARGUMENT**

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**TO: DEFENDANT GAILON ARTHUR JOY, P.O. BOX 1425, STERLING, MA 01564**  
**DEFENDANT ROBERT PICKLE, 1354 COUNTY HIGHWAY 21, HALSTAD,**  
**MN 56548**

**NOTICE**

**PLEASE TAKE NOTICE** that on a day and time to be determined by the Court, the undersigned counsel for Plaintiffs Three Angels Broadcasting Network and Danny Shelton will bring a Motion for Protective Order against Defendants Gailon Arthur Joy and Robert Pickle pursuant to Fed. R. Civ. P. 26(c) and Local Rules 7.1 and 37.1 of the District of Massachusetts, at the United States Court House (Donohue Federal Building), 595 Main Street, Worcester, Massachusetts, 01608.

**MOTION**

Plaintiffs Three Angels Broadcasting Network, Inc. and Danny Shelton hereby move the Court for an Order as follows:

1. Directing that the discovery of 3ABN donor names and donation information, as well as other trade secret information of the Plaintiffs, not be had;
2. Directing that any financial or otherwise confidential business or commercial information to be produced by any party shall be subject to an appropriate confidentiality agreement;
3. Directing that the disclosure or discovery of documents and information in the case be had only on the specific terms and conditions of the Protective Order attached hereto as Exhibit A; and
4. For such other relief as to the Court would appear just and equitable.

This Motion is based upon Plaintiffs' Notice of Motion and Motion for Protective Order, Plaintiffs' Memorandum in Support of Motion for Protective Order, any Affidavit(s) filed herewith, the Arguments of Counsel and all other files, record and proceedings herein.

**REQUEST FOR ORAL ARGUMENT**

Plaintiffs respectfully request that this Honorable Court set a day and time for oral argument to be heard on this Motion.

Respectfully Submitted:

**Attorneys for Plaintiffs Three Angels  
Broadcasting Network, Inc. and  
Danny Shelton**

Dated: December 18, 2007

**FIERST, PUCCI & KANE LLP**

/s/ J. Lizette Richards

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and

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Wm Christopher Penwell (MNReg. #161847)  
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Local Rule 7.1 Certificate

Undersigned counsel hereby attests that Plaintiffs have complied with the requirements of Local Rule 7.1 by having, in good faith, through counsel and without success, conferred with Defendants in an attempt to resolve or narrow the discovery dispute at issue.

Dated: December 18, 2007

/s/ J. Lizette Richards

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J. Lizette Richards

Local Rule 37.1 Certificate

Undersigned counsel hereby attests that Plaintiffs have complied with the requirements of Local Rule 37.1 by having, in good faith, through counsel and without success, conferred with Defendants to narrow the areas of disagreement to the greatest possible extent.

Dated: December 18, 2007

/s/ J. Lizette Richards

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J. Lizette Richards

Certificate of Service

I, J. Lizette Richards, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 18, 2007.

Dated: December 18, 2007

/s/ J. Lizette Richards

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J. Lizette Richards