



4. The third-party subpoena is not overbroad, for public records and publications freely available provide a basis for seeking bank records back to 1998 and concerning Plaintiff Shelton's personal publishing ventures.

5. The District of Massachusetts has already decided not to impound the underlying case.

6. The Plaintiffs were instructed by the court on December 14, 2007, that any proposed protective order would have to be narrowly tailored, which their proposed Protective Order definitely is not.

7. Local Rules for the District of Massachusetts disallow blanket orders of impoundment such as the Plaintiffs' proposed Protective Order.

8. The Honorable Judge Dennis Saylor already stated on December 14, 2007, that there would be no stay of discovery pending a hearing on the Plaintiffs' proposed Protective Order.

9. In regards to a special master, Plaintiff Shelton seeks to use the District of Minnesota to force the District of Massachusetts to do what it has thus far seen no need to do, and has not been asked by Plaintiff Shelton's counsel to do.

WHEREFORE, Defendant Pickle prays the Court to deny Plaintiff Shelton's Motion to Quash or for Protective Order, and Plaintiff Shelton's Motion to Stay and Remit, or to Appoint a Special Master.

Respectfully submitted,

Dated: February 25, 2008

/s Robert Pickle, pro se

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