

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

PUEBLO OF ZUNI, on behalf of itself and all others similarly situated,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV 01-1046 WJ/WPL
	)	Filed Electronically
UNITED STATES OF AMERICA; <i>et al</i>	)	
	)	
Defendants.	)	

**MOTION FOR A PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. Proc. 26(c), Plaintiff Pueblo of Zuni, by and through undersigned counsel, respectfully moves for a Protective Order –

- (1) preventing the Government from blocking contacts by Plaintiff’s counsel with non-managerial Government employees;
- (2) preventing the Government from instructing its employees not to cooperate with Plaintiff’s counsel or otherwise inhibiting informal discovery; and
- (3) directing the Government to withdraw any existing instructions to its employees that conflict with the protective order.

In support of this Motion, the Court is respectfully referred to the accompanying Memorandum and the Exhibits attached thereto.

Pursuant to Local Rule 7.1, Plaintiff’s counsel has conferred with Defendants’ counsel and is authorized to state that “the defendants will be opposing this motion and filing a cross motion for a protective order.”

Respectfully submitted this 27th day of December 2005.

SONOSKY, CHAMBERS, SACHSE,  
ENDRESON & MIELKE, LLP

*/s/ Melanie Baca Osborne*

By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 27th day of December, 2005, I sent by electronic mail, or caused to be sent by electronic mail, a true and correct copy of the **Motion for a Protective Order** to the following attorneys of record (or their co-counsel) for Defendants:

Rachel J. Hines, Trial Attorney  
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*/s/ Lindy O. Bockhorst*

By: \_\_\_\_\_

Lindy O. Bockhorst