

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL ABRAMOWITZ, et al.,

Plaintiffs,

v.

KARI LAKE, et al.,

Defendants.

Civil Action No. 25-0887 (RCL)

PATSY WIDAKUSWARA, et al.,

Plaintiffs,

v.

KARI LAKE, et al.,

Defendants.

Civil Action No. 25-1015 (RCL)

MOTION FOR PROTECTIVE ORDER

Defendants, by and through undersigned counsel, respectfully request entry of the enclosed Protective Order to govern the production of documents and information during discovery in this action and to protect from public disclosure information giving rise to confidentiality concerns. Pursuant to Local Civil Rule 7(m), the parties have conferred, and Plaintiffs stated their position is: “Plaintiffs in the Widakuswara and Abramowitz cases oppose the motion for a protective order, but have agreed to keep the three depositions in this action confidential until the Court rules on the motion or until the parties agree on any portions of the depositions or video of the depositions that will be protected by a protective order.”

Defendants have reason to believe that the disclosure of information in this case may infringe upon the privacy interests of the parties or might otherwise compromise recognized

confidentiality interests. For example, the exchange of information and documents in this matter may implicate, issues regarding sensitive foreign affairs and diplomacy. The information exchanged in this matter may also include information relating to third-party individuals and protected from disclosure by the Privacy Act, 5 U.S.C. § 552a. Accordingly, the proposed protective order will facilitate the parties' discovery efforts without violating the privacy or proprietary interests of the parties or other individuals mentioned in the covered materials. The proposed protective order will further ensure that sensitive information is kept confidential except as is necessary for the litigation of the above-captioned matter.

A proposed Protective Order is enclosed herewith and sets forth the procedures to be followed by the parties when exchanging covered material and filing such material with the Court.

Dated: September 8, 2025

Respectfully submitted,

JEANINE FERRIS PIRRO
United States Attorney

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