

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**ROBERT DAVID STEELE *et al.*,**

**Plaintiffs,**

**v.**

**Civil Action No. 3:17cv601**

**JASON GOODMAN *et al.*,**

**Defendants.**

**RESPONSE TO MOTION FOR PROTECTIVE ORDER AND  
NOTICE OF PARTIES' AGREEMENT**

NOW COMES Defendant, Patricia Negron, by counsel and confirms that she agrees to the terms of the Protective Order filed today by Plaintiff. In addition, Defendant Goodman has advised undersigned counsel that he is in agreement with the Order as well (See attached email).

Dated: August 7, 2019

Respectfully submitted,

**PATRICIA A. NEGRON**

By:                   /s/ R. Johan Conrod, Jr.  
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*Counsel for Defendant Patricia A. Negron*



**Conrod, R. Johan**

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**To:** Conrod, R. Johan  
**Subject:** FW: Stipulated Protective Order

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**From:** Jason Goodman [mailto:truth@crowdsourcethetruth.org]  
**Sent:** Wednesday, August 7, 2019 9:57 AM  
**To:** Steven Biss <stevenbiss@earthlink.net>  
**Cc:** Conrod, R. Johan <rjconrod@kaufcan.com>  
**Subject:** Re: Stipulated Protective Order

Upon further consideration and after conversation with Mr. Conrod, I will accept the document without my added paragraph 14. Go ahead and file it.