

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
Tallahassee Division**

JANE DOE, individually and on behalf
of her minor daughter, SUSAN DOE,
et al.,

Plaintiffs,

v.

JOSEPH A. LADAPO, M.D., *in his
official capacity as Florida's Surgeon
General of the Florida Department of
Health*, et al.,

Defendants.

Case No. 4:23-cv-00114-RH-MAF

**JOINT MOTION FOR ENTRY OF (1) PROTECTIVE ORDER AND (2)
HIPAA QUALIFIED PROTECTIVE ORDER AND ORDER TO DISCLOSE
PROTECTED HEALTH INFORMATION**

Pursuant to Fed. R. Civ. P. 26(c) and other applicable law, the parties to this action jointly move for entry of two orders to facilitate discovery and to govern the use of confidential information and documents. The first is a general protective order and the second is a HIPAA qualified protective order. The parties have discussed

these issues and agreed to the language on the proposed orders attached hereto as Exhibits 1 and 2.¹

By agreeing to the language of the proposed orders, the parties do not waive any objection they may have to requests for documents or information that would be covered by the proposed orders.

WHEREFORE, the parties jointly request that the Court enter the attached proposed orders.

Respectfully submitted, August 3, 2023.

By: /s/ Thomas E. Redburn, Jr.
Thomas E. Redburn, Jr.
Counsel for Plaintiffs

/s/ Michael Beato
Michael Beato
Counsel for Medical Defendants

¹ This Motion shall apply to Defendants the Boards of Medicine and individual Board Members who are represented by the law firm Holtzman Vogel Baran Torchinsky & Josefiak PLLC only. All other Defendants are not signatories to this Order and thus are not included in any reference to “party,” “parties,” or “Defendants.”

FOR THE PLAINTIFFS:

LOWENSTEIN SANDLER LLP

Thomas E. Redburn, Jr.*

NY Bar No. 5822036

Maya Ginsburg*

NY Bar No. 5128152

1251 Avenue of the Americas

New York, NY 10020

(212) 262-6700

treburn@lowenstein.com

mginsburg@lowenstein.com

SOUTHERN LEGAL COUNSEL

Simone Chriss

Florida Bar No. 124062

Chelsea Dunn

Florida Bar No. 1013541

1229 NW 12th Avenue

Gainesville, FL 32601

(352) 271-8890

Simone.Chriss@southernlegal.org

Chelsea.Dunn@southernlegal.org

**HUMAN RIGHTS CAMPAIGN
FOUNDATION**

Cynthia Cheng-Wun Weaver*

NY No. 5091848

Jason Starr*

NY No. 5005194

Ami Patel*

CA No. 325647

1640 Rhode Island Avenue NW

Washington, D.C. 20036

(202) 993-4180

Cynthia.Weaver@hrc.org

Jason.Starr@hrc.org

Ami.Patel@hrc.org

**NATIONAL CENTER FOR
LESBIAN RIGHTS**

Christopher F. Stoll*

CA Bar No. 179046

Kelly Jo Popkin*

NY Bar No. 5698220

National Center for Lesbian
Rights

870 Market Street, Suite 370

San Francisco, CA 94102

Tel. 415-365-1320

cstoll@nclrights.org

kpopkin@nclrights.org

**GLBTQ LEGAL ADVOCATES
& DEFENDERS**

Jennifer Levi*

Chris Erchull*

18 Tremont, Suite 950

Boston, MA 02108

(617) 426-1350

jlevi@glad.org

cerchull@glad.org

* Admitted by *pro hac vice*

Counsel for Plaintiffs

FOR THE MEDICAL DEFENDANTS:

Mohammad O. Jazil (FBN 72556)

Gary V. Perko (FBN 855898)

Michael Beato (FBN 1017715)

HOLTZMAN VOGEL BARAN

TORCHINSKY & JOSEFIK PLLC

119 S. Monroe St., Suite 500

Tallahassee, FL 32301

(850) 270-5938

mjazil@holtzmanvogel.com

gperko@holtzmanvogel.com

mbeato@holtzmanvogel.com

Counsel for Medical Defendants