

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

IN THE MARION SUPERIOR COURT

CAUSE NO. 49D01-1907-PL-27728

JOSHUA PAYNE-ELLIOTT,)
)
 Plaintiff,)
)
ROMAN CATHOLIC ARCHDIOCESE OF)
INDIANAPOLIS, INC.,)
)
 Defendant.)

**DEFENDANT ROMAN CATHOLIC ARCHDIOCESE OF
INDIANAPOLIS, INC.’S MOTION FOR PROTECTIVE ORDER**

Pursuant to Rule 26(C) of the Indiana Rules of Trial Procedure, Defendant, Roman Catholic Archdiocese of Indianapolis, Inc. (“Archdiocese”), respectfully moves the Court to enter a Protective Order staying discovery pending the Court’s ruling on the motion to dismiss on First Amendment grounds. If the case is not dismissed on First Amendment grounds, the Archdiocese requests that the Court limit discovery to the applicability of the ministerial exception until that affirmative defense is resolved, and that the Court issue a Protective Order prohibiting discovery of information subject to heightened protection under the First Amendment right of expressive association.

The grounds for this Motion are stated more fully in the accompanying Memorandum of Law, which is incorporated herein by reference as if set forth in full.

Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following by this court's electronic filing system this ____ day of _____ 2019:

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