## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	) ) ) CA 98-2	175 JJF
er (1122 STITLES OF THINERIUS),	)	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
Plaintiff,	)	
	)	
	)	
	)	
FEDERATION OF PHYSICIANS AND	)	
DENTISTS, INC.,	)	
	)	
Defendant.	)	
	)	
	)	

## UNITED STATES' MOTION FOR ENTRY OF ITS PROPOSED PROTECTIVE ORDER

Pursuant to Fed. R. Civ. P. 7(b) and D. Del. LR 7.1.1, plaintiff, the United States, respectfully requests that the Court, pursuant to Fed. R. Civ. P. 26(c)(7), enter the attached, proposed Protective Order for the reasons stated in plaintiff's accompanying brief. In support of

this motion, plaintiff states that, as the accompanying brief shows, it has made a reasonable effort to reach agreement with defendant's attorneys on the subject of this motion.

Dated: December 30, 1998

COUNSEL FOR PLAINTIFF UNITED STATES OF AMERICA

RICHARD G. ANDREWS UNITED STATES ATTORNEY

By: Virginia Gibson-Mason (DSB # 3699) Assistant United States Attorney 1201 Market Street, Suite 1100 Wilmington, DE 19801

Tel.: (302)573-6277

/s/\_\_\_\_

Melvin A. Schwarz Special Counsel for Enforcement U.S. Department of Justice Antitrust Division 601 D Street, N.W. Washington, D.C. 20530

Tel.: (202) 305-1210

Steven Kramer
Richard S. Martin
Denise E. Biehn
Michael D. Farber
Heather H. Howard,
Attorneys
U.S. Department of Justice
Antitrust Division
325 Seventh Street, N.W.
Washington, D.C. 20530
Tel.: (202) 307-0997