

FILED
MOTIONS DOCKET

2022 NOV -4 AM 10:37

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

VIRGINIA: IN THE CIRCUIT COURT FOR THE COUNTY OF FAIRFAX

PAUL SHAO,

Plaintiff,

v.

Case No.: 2021-03802

Jury Trial Demanded

ALLSTATE INSURANCE COMPANY,

Defendant.

**PLAINTIFF'S REPLY TO THE PROPOSED PROTECTIVE ORDER FOR
MODIFICATION REQUEST**

Shao opposed Allstate's 10-24-22 STIPULATED PROTECTIVE ORDER because it did not contain a definition of Confidential Information and Materials and for the CONSENT MOTION FOR PROTECTIVE ORDER Allstate did not solicitate Shao's opinion on the subject matter.

Shao is readily to agree to a Protective Order if it contains a clear definition of Confidential Information and Materials, which reads, "Confidential Information and Materials shall include all information and materials that have not been made public or are not readily available to the third party, the disclosure of which the disclosing party contends could cause harm to the other party."

Shao has conveyed this view to the Defendant via 11-2-22 Email as Exhibit A.

Dated: November 4, 2022.

Respectfully Submitted

PAUL SHAO,

Pro se litigant



Paul Shao

9233 Lee Masey Drive,
Lorton, Virginia 22079
(202) 290-6300 Telephone
paulyshao@gmail.com

CERTIFICATE OF SERVICE

I certified that on November 4, 2022, a copy of the foregoing PLAINTIFF'S REPLY TO THE PROPOSED PROTECTIVE ORDER FOR MODIFICATION REQUEST was filed with the clerk's office of the Court, emailed, and mailed to Defendant at the following address:

Bret C. Marfut
bmarfut@sayfarth.com
SEYFARTH SHAW LLP
975 F Street, N.W.
Washington, DC 20004-1454

A handwritten signature in black ink, consisting of a large, loopy 'P' followed by a smaller, more intricate signature.

Paul Shao

Exhibit A



Paul Shao <paulyshao@gmail.com>

Shao v. Allstate - Motion for Protective Order

Paul Shao <paulyshao@gmail.com>

Wed, Nov 2, 2022 at 1:46 PM

To: "Marfut, Bret C." <bmarfut@seyfarth.com>

Hi Mr. Marfut. Welcome, Ms. Gregory!

The reason I opposed the Protective Order sent on 10-24-22 and 10-27-22 was because it did not contain the definition of Confidential Information and Materials (which, I suggest, shall include all Information and Materials that have not been made public or are not readily available to the third parties, the disclosure of which the disclosing party contends could cause harm to the other party). Therefore, if in dispute, one party can easily point to the availability of the information and materials to the public to defeat the claim of confidentiality.

If you would include this definition of Confidential Information and Materials in the Proposed Protective Order, Shao is quite ready to consent to it.

Another suggestion is to include the redaction of Materials to neutralize the confidential nature of the document under question per Fed. Rule of Civil Procedure 5.2 and Va. Code § 8.01-420.8. Case in point is that Allstate's 8-28-22 1st RPD #23 request states, "Documents sufficient to evidence transmission and receipt of the \$2,851.44 and \$10,508.09 payments alleged to have been made on your loan as set forth in Paragraph 17 of the Complaint," which involves the production of returned check or bank statement, to prevent the exposure of the bank account number to the third party, the redaction of a document would be the most effective way to do so.

Regards,

Paul Shao

[Quoted text hidden]