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July 25, 2013

Mr. Douglas Handshoe
214 Corinth Drive
Bay St. Louis, Mississippi 35920

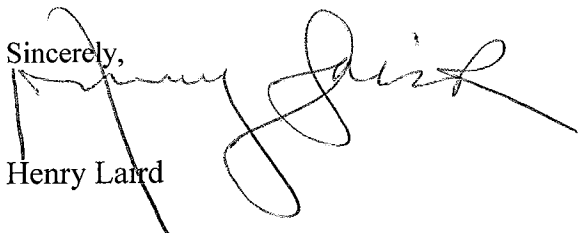
Re: ***Handshoe v. Broussard, et al.;***
United States District Court, Southern District of Mississippi, Southern Division;
Civil Action No. 1:13CV251-LG-JMR

Dear Mr. Handshoe:

Enclosed please find copies of the following documents which have been filed with the Court via ECF on behalf of Defendants, Charles Leary, Vaughan Perret, and Trout Point Lodge Limited:

1. Motion for Protective Order of Charles Leary and Vaughan Perret; and
2. Memorandum Brief in Support of Motion of Defendants, Charles Leary and Vaughan Perret, for Protective Order.

Sincerely,


Henry Laird

HFL/ld
Enclosures

cc: Daniel G. Abel, Esquire

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JONES WALKER LLP

ALABAMA * ARIZONA * CALIFORNIA * DISTRICT OF COLUMBIA * FLORIDA * GEORGIA * LOUISIANA * MISSISSIPPI * NEW YORK * TEXAS

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NO: 1:13CV251 LG JMR

**AARON F. BROUSSARD, DANIEL ABEL,
CHARLES LEARY, VAUGHN PERRET,
CHRIS YOUNT, TROUT POINT LODGE
LIMITED, NOVA SCOTIA ENTERPRISES, LLC**

DEFENDANTS

**MOTION OF DEFENDANTS, CHARLES LEARY, VAUGHAN PERRET,
AND TROUT POINT LODGE, LIMITED FOR PROTECTIVE ORDER**

COME NOW Defendants, Charles Leary, Vaughan Perret and Trout Point Lodge, Limited, and show that on or about July 15, 2013 Plaintiff, Douglas Handshoe, served counsel for these Defendants with Plaintiff's Interrogatories to be Answered by Defendants Under Oath, Plaintiff's Request for Production of Documents to be Responded to by Defendant Under Oath, and Plaintiff's Request for Admission of Facts. On June 28, 2013 the Court entered its Order Staying Proceedings [Docket No. 18] staying, among other things, Plaintiff's discovery requests. Pursuant to Federal Rule of Civil Procedure 26 and Local Uniform Civil Rule 26 discovery, at the earliest, cannot be commenced until after the Case Management Conference, which has not yet been set.

Accordingly, Defendants, Charles Leary, Vaughan Perret and Trout Point Lodge, Limited, move for a protective order relieving them from responding to Plaintiff's Interrogatories

to be Answered by Defendants Under Oath, Plaintiff's Request for Production of Documents to be Responded to by Defendant Under Oath, and Plaintiff's Request for Admission of Facts.

RESPECTFULLY SUBMITTED this the 25th day of July, 2013.

CHARLES LEARY, VAUGHN PERRET,
AND TROUT POINT LODGE, LIMITED,

By: s/ Henry Laird
Henry Laird, MS Bar No. 1774

CERTIFICATE OF SERVICE

I, Henry Laird, of the law firm of Jones Walker LLP do hereby certify that I have sent a true and correct copy of the foregoing Motion for Protective Order by using the ECF system to the following:

Douglas Handshoe
214 Corinth Drive
Bay St. Louis, Mississippi 39520
VIA UNITED STATES MAIL AND EMAIL: earning04@gmail.com

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c/o Roland J. Vega
3329 Florida Avenue
Kenner, LA 70065

Chris Yount
160 Metairie Lawn Drive
Metairie, LA 70001

Daniel G. Abel
2421 Clearview Parkway
Legal Department, Suite 106
Metairie, LA 70001

This the 25th day of July, 2013.

s/ Henry Laird
Henry Laird

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