

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 15-cv-20782-MARTINEZ/GOODMAN

DENNIS MONTGOMERY,

Plaintiff,

v.

JAMES RISEN et al.,

Defendants.

\_\_\_\_\_ /

**DEFENDANTS' NOTICE OF HEARING**

In accordance with the Court's Discovery Procedures, ECF No. 48, Defendants James Risen, Houghton Mifflin Harcourt Publishing Company, and Houghton Mifflin Harcourt Company (collectively, "Defendants"), hereby give notice that a hearing will be held before U.S. Magistrate Judge Jonathan Goodman on July 10, 2015, at 3:30 p.m. The discovery matter to be heard is whether the Defendants' proposed protective order, attached hereto as Exhibit A, should be entered.

**Certificate of Good-Faith Conference;  
Conferred but Unable to Resolve the Issues Presented in the Motion**

In accordance with Local Rule 7.1(a)(3)(A), the undersigned certifies that Defendants' counsel has conferred with all parties or non-parties who may be affected by the relief sought in this motion in a good-faith effort to resolve the issues but has been unable to resolve the issues.

s/Brian W. Toth

Dated: June 30, 2015

Respectfully submitted,

s/Brian W. Toth  
Sanford L. Bohrer  
Florida Bar No. 160643  
sbohrer@hklaw.com  
Brian W. Toth  
Florida Bar No. 57708  
brian.toth@hklaw.com  
HOLLAND & KNIGHT LLP  
701 Brickell Avenue, Suite 3300  
Miami, Florida 33131  
Telephone: (305) 374-8500  
Fax: (305) 789-7799

– and –

Laura R. Handman (admitted *pro hac vice*)  
laurahandman@dwt.com  
Micah J. Ratner (admitted *pro hac vice*)  
micahratner@dwt.com  
DAVIS WRIGHT TREMAINE LLP  
1919 Pennsylvania Ave., NW, Suite 800  
Washington, D.C. 20006  
Tel.: (202) 973-4200  
Fax: (202) 973-4499

*Counsel for Defendants*

### **CERTIFICATE OF SERVICE**

I certify that on June 30, 2015, I filed this document with the Clerk of Court using CM/ECF, which will serve this document on all counsel of record.

s/Brian W. Toth