

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ALLENTOWN WOMEN’S CENTER, INC., :

Plaintiff, :

v. :

JOHN DUNKLE :

and :

ANTHONY J. SULPIZIO :

and :

MARK MICHAEL BOGUNOVICH :

and :

JOHN DOE Nos. 1-5, :
Defendants. :

Civil Action No.: _____

**ALLENTOWN WOMEN’S CENTER, INC.’S MOTION FOR PROTECTIVE ORDER
TO PERMIT WITNESSES TO USE PSEUDONYMS**

Plaintiff Allentown Women’s Center, Inc. (“AWC”) hereby respectfully moves this Court for an order permitting AWC’s owner, employees and volunteer escorts to use the pseudonyms ascribed to them in AWC’s Complaint.

1. AWC makes this request to protect AWC owner, Dr. Roe; AWC employees, Nurse Executive Doe and Employee No. 1; and AWC volunteer escorts, Escort Stiles and Escort Smith (collectively, “witnesses”) from publicly revealing their identities so that they may avoid harassment and retaliation from Defendants John Dunkle (“Dunkle”), Anthony Sulpizio (“Sulpizio”) and Mark Michael Bogunovich (“Bogunovich”) (collectively “Defendants”), associates of Defendants, and members of the public.

2. The need for anonymity is particularly acute given the contentious and politically charged nature of this case and the highly sensitive subject matter of the witnesses’ testimony.

3. The witnesses’ anonymity will not prejudice Defendants.

4. AWC's Motion is supported by Plaintiff's contemporaneously filed Memorandum of Law.

Dated: April 11, 2019

Respectfully submitted,

WOMEN'S LAW PROJECT

/s/ Susan Frietsche

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