

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

FAIRHOLME FUNDS, INC., <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	No. 13-465C
)	(Judge Sweeney)
THE UNITED STATES,)	
)	
Defendant.)	

APPLICATION FOR ACCESS TO PROTECTED INFORMATION

Pursuant to paragraph 7 of this Court’s Amended Protective Order dated July 29, 2015 (ECF No. 217), defendant, the United States, respectfully requests that Jennifer O’Connor, James Walsh, and Allison Murphy be permitted access to information protected by the Protective Order. All of the applicants are attorneys representing the United States within the meaning of Paragraph 4 of the Protective Order, and work in the Office of the White House Counsel. Counsel for the United States has consulted with counsel for plaintiffs, Fairholme Funds, Inc., *et al.* (Fairholme), who has indicated that Fairholme does not oppose these applications for access to protected information.

Respectfully submitted,

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General

s/ Robert E. Kirschman, Jr.
ROBERT E. KIRSCHMAN, JR.
Director

s/ Kenneth M. Dintzer
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August 21, 2015

Attorneys for Defendant

ATTACHMENT A

In the United States Court of Federal Claims

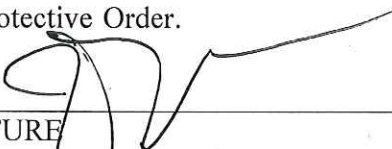
No. 13-456C

 FAIRHOLME FUNDS, INC. et al., *
 *
 Plaintiffs, *
 *
 v. *
 *
 THE UNITED STATES, *
 *
 Defendant. *

DECLARATION OF JEN O'CONNOR

I hereby certify that I have carefully reviewed and am fully familiar with the provisions of the Protective Order dated 7/29, entered and filed of record in the above-captioned litigation ("Protective Order").

I certify that I am eligible to have access to Confidential Material, pursuant to paragraphs 4 and 7 of the Protective Order. As a condition precedent to my examination of any Protected Information pursuant to the Protective Order, or any information contained in said material, I hereby agree that the Protective Order and any amendments thereto shall be deemed directed to and shall bind me, and that I shall observe and comply with all provisions of the Protective Order.



 SIGNATURE

JEN O'CONNOR

 NAME (PRINTED)

1600 PENNSYLVANIA AVE NW

 BUSINESS ADDRESS

EXECUTIVE OFFICE OF THE PRESIDENT

 CURRENT EMPLOYER

DEPUTY COUNSEL TO THE PRESIDENT

 CURRENT OCCUPATION OR JOB DESCRIPTION

ATTACHMENT A

In the United States Court of Federal Claims

No. 13-456C

 FAIRHOLME FUNDS, INC. et al., *
 *
 Plaintiffs, *
 *
 v. *
 *
 THE UNITED STATES, *
 *
 Defendant. *

James D Walsh

DECLARATION OF _____

I hereby certify that I have carefully reviewed and am fully familiar with the provisions of the Protective Order dated 7/29, entered and filed of record in the above-captioned litigation ("Protective Order").

I certify that I am eligible to have access to Confidential Material, pursuant to paragraphs 4 and 7 of the Protective Order. As a condition precedent to my examination of any Protected Information pursuant to the Protective Order, or any information contained in said material, I hereby agree that the Protective Order and any amendments thereto shall be deemed directed to and shall bind me, and that I shall observe and comply with all provisions of the Protective Order.

James D. Walsh
SIGNATURE

James D. Walsh
NAME (PRINTED)

1600 Pennsylvania Ave NW
BUSINESS ADDRESS

Executive Office of the President
CURRENT EMPLOYER

Associate Counsel to the President
CURRENT OCCUPATION OR JOB DESCRIPTION

ATTACHMENT A

In the United States Court of Federal Claims

No. 13-456C

 FAIRHOLME FUNDS, INC. et al., *
 *
 Plaintiffs, *
 *
 v. *
 *
 THE UNITED STATES, *
 *
 Defendant. *

DECLARATION OF Allison F. Murphy

I hereby certify that I have carefully reviewed and am fully familiar with the provisions of the Protective Order dated 7/29, entered and filed of record in the above-captioned litigation ("Protective Order").

I certify that I am eligible to have access to Confidential Material, pursuant to paragraphs 4 and 7 of the Protective Order. As a condition precedent to my examination of any Protected Information pursuant to the Protective Order, or any information contained in said material, I hereby agree that the Protective Order and any amendments thereto shall be deemed directed to and shall bind me, and that I shall observe and comply with all provisions of the Protective Order.

Allison F. Murphy
SIGNATURE

ALLISON F. MURPHY
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