

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

ABDISALAM WILWAL, *et al.*,  
Plaintiffs,

v.

KIRSTJEN NIELSEN, *et al.*,  
Defendants.

Case No. 0:17-cv-02835

**JOINT MOTION FOR ENTRY OF STIPULATED CLAWBACK ORDER AND ORDER  
PURSUANT TO RULE 502(d)**

Plaintiffs Abdisalam Wilwal et al. (“Plaintiffs”), and Defendants Kirstjen Nielsen, et al., and the United States of America (“Defendants”), respectfully move this Court, pursuant to the Federal Rule of Civil Procedure 7(b) and Federal Rule of Evidence 502(d), for entry of the attached Stipulated Protective Order governing the discovery of information subject to a claim of privilege or protection as trial-preparation material. Discovery in this action may yield documents and information of a sensitive and confidential nature. As a result, Plaintiffs and Defendants have agreed to the attached proposed Stipulated Protective Order and request that the Court enter it in this case.

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