

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

<hr/>		)
GENE R. ROMERO, <i>ET AL.</i>		)
		)
<b>Plaintiffs,</b>		)
		)
<b>v.</b>		)
		)
ALLSTATE INSURANCE COMPANY, <i>ET AL.</i>		)
		)
<b>Defendants.</b>		)
<hr/>		)
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,		)
		)
<b>Plaintiffs,</b>		)
		)
<b>v.</b>		)
		)
ALLSTATE INSURANCE COMPANY,		)
		)
<b>Defendant.</b>		)
<hr/>		)
GENE R. ROMERO, <i>ET AL.</i>		)
		)
<b>Plaintiffs</b>		)
		)
<b>v.</b>		)
		)
THE ALLSTATE CORPORATION, <i>ET AL.</i>		)
		)
<b>Defendants.</b>		)
<hr/>		)

**ALLSTATE’S MOTION FOR A PROTECTIVE ORDER CONCERNING  
PLAINTIFFS’ NOTICE OF VIDEOTAPED DEPOSITION OF DEFENDANTS  
ALLSTATE INSURANCE COMPANY AND THE ALLSTATE CORPORATION  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)**

For the reasons set forth in the accompanying Memorandum of Law, Allstate Insurance Company and the Allstate Corporation (collectively, “Allstate”) respectfully move this Court for a Protective Order staying ”Plaintiffs’ Notice of Videotaped Deposition of Defendants Allstate

Insurance Company and the Allstate Corporation Pursuant to Federal Rule of Civil Procedure 30(b)(6)” until after Plaintiffs have limited the scope of this notice to only Release-related discovery topics, or, in the alternative, until such time as the Court provides further direction as to the scope of Release-related discovery.

Dated: October 31, 2011

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing was served on October 31, 2011, by the Court's Electronic Case Filing system and by electronic mail on all counsel of record.

/s/ Jordan M. Heinz