

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

ASHLEY DIAMOND,

Plaintiff,

v.

TIMOTHY WARD, et al.,

Defendants.

CASE NO. 5:20-CV-00453-MTT

PLAINTIFF'S MOTION FOR PROTECTIVE ORDER

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, this Court's equitable powers, and the All Writs Act, Plaintiff Ashley Diamond moves this Court for the issuance of a protective order (1) enjoining Defendants and their agents from retaliating against Ms. Diamond and John Doe, or any other witness, including GDC staff; and (2) enjoining Defendants and their agents from taking any adverse action against Ms. Diamond based on the altered designations of her as a PREA aggressor and security threat group member.

The grounds for this Motion are set forth in the accompanying Memorandum of Law. Plaintiff also respectfully refers the Court to the Declaration of Ashley Diamond, the Declaration of Dr. Randi C. Ettner, the Declaration of James Aiken, the Declaration of Jammi Blake Duckworth, the Declaration of John Doe, the Declaration of A. Chinyere Ezie, with attached exhibits, and the Declaration of Maya G. Rajaratnam, filed herewith. To the extent the Court seeks additional evidence before issuance of this Order, Plaintiff requests limited expedited discovery.

Plaintiff respectfully requests an evidentiary hearing on this Motion.

Dated: April 9, 2021

Respectfully submitted,

/s/ Elizabeth Littrell

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Counsel for Plaintiff Ashley Diamond
** Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2021, I electronically filed Plaintiff's Motion for a Protective Order, supporting Memorandum of Law, and all accompanying Declarations and Exhibits thereto with the Clerk of the Court and all counsel of record using the CM/ECF system.

/s/ Maya G. Rajaratnam
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