

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

Venancio Aguasanta Arias, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	<b>FILED UNDER SEAL</b>
v.	)	<b>REDACTED VERSION</b>
	)	Case Number: 1:01cv01908 (RWR-DAR)
DynCorp, <i>et al.</i>	)	
Defendants.	)	
Nestor Ermogenes Arroyo Quinteros, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	Case Number: 1:07cv01042 (RWR-DAR)
v.	)	
	)	(Cases Consolidated for Case
DynCorp, <i>et al.</i>	)	Management and Discovery)
Defendants.	)	
	)	

**CONSENT MOTION TO IMPLEMENT THE  
COURT’S MARCH 28, 2012 ORDERS**

In the Court’s memorandum opinion dated March 28, 2012, which was filed under seal, the Court denied the defendants’ motion for reconsideration of the Court’s order compelling the defendants’ production of non-spray flight lines.<sup>1</sup> In accompanying orders, the Court directed the parties to meet, confer, and jointly submit to the Court two separate things: (1) a proposed, agreed-upon, redacted version of the March 28, 2012 memorandum opinion to be posted to the public docket, and (2) a proposed order approving supplemental procedures that the parties have agreed upon in connection with the ordered disclosure of the non-spray flight lines. This consent motion addresses both of the Court’s directions.

---

<sup>1</sup> Defendants’ motion for reconsideration was ECF No. 200 in the *Arias* docket and ECF No. 158 in the *Quinteros* docket (May 27, 2010).

**1. The Redacted Version of the March 28, 2012 Memorandum Opinion**

The parties have agreed to the redactions shown on the version of the March 28 memorandum opinion that is attached as Exhibit A to this consent motion. The parties request that the Court instruct the Clerk's office to post it on the public docket. The parties also request that the Court instruct the Clerk's office to assure that the order is distributed by the ECF system only to current counsel of record and not to terminated counsel of record.<sup>2</sup>

**2. Supplemental Security Procedures To Be Followed in Connection with the Production of Non-Spray Flight Lines**

The parties have agreed upon proposed security-related procedures to be followed in connection with the defendants' production of the non-spray flight lines to the plaintiffs. These procedures include strict compliance with the Amended Protective Order in place in these cases and other specific provisions that address the security concerns expressed earlier to the Court by the DynCorp defendants, the amicus EAST Inc., and the U.S. Department of State. These specific procedures are outlined in Exhibit B to this consent motion, which has been filed under seal at the defendants' request.

The parties jointly request that the Court approve the specific procedures set out in Exhibit B but without making those procedures part of the Court's public order. A proposed Order to accomplish this request has been filed simultaneously with this consent motion.

---

<sup>2</sup> Although the Clerk's office has received the appropriate notices regarding terminated counsel, the ECF notices in the *Arias* and *Quinteros* cases are still being sent to terminated counsel. Considering the sensitive nature of some of the filings and orders in this case, the parties request the Court's assistance in correcting this situation.

Dated: April 18, 2012

Respectfully Submitted:

/s/ Rosemary Stewart  
Joe G. Hollingsworth (D.C. Bar # 203273)  
Eric G. Lasker (D.C. Bar # 430180)  
Rosemary Stewart (D.C. Bar # 204438)  
HOLLINGSWORTH LLP  
1350 I Street, NW  
Washington, D.C. 20005  
Phone: (202) 898-5800  
Fax: (202) 682-1639

Counsel for the DynCorp Defendants

/s/ Eric J. Hager  
Eric J. Hager (D.C. Bar # 975861)  
CONRAD & SCHERER, LLP  
Avenida Republica de El Salvador 500  
E Irlands  
Edificio Siglo XXI, PH Oficina W  
Quito, Ecuador  
Phone: (593 2) 2468-575  
Fax (593 2) 2452-961

Counsel for the *Arias/Quinteros* Plaintiffs