

**IN THE CIRCUIT COURT OF WASHINGTON COUNTY, ARKANSAS
CIVIL DIVISION**

**PROTECT FAYETTEVILLE, f/k/a REPEAL 119;
PAUL SAGAN; PETER TONNESSON; and
PAUL PHANEUF**

PLAINTIFFS

and

THE STATE OF ARKANSAS

INTERVENOR

vs.

Case No. 72CV-15-1510

**THE CITY OF FAYETTEVILLE, Washington County, Arkansas;
LIONELD JORDAN, in his official capacity as Mayor of Fayetteville;
ADELLA GRAY, SARAH MARSH, MARK KINION, MATTHEW
PETTY, JUSTIN TENANT, MARTIN W. SCHOPPMAYER JR.,
JOHN LATOUR and ALAN LONG, in their official capacities as
Aldermen of the Fayetteville City Council**

DEFENDANTS

**PFLAG OF NORTHWEST ARKANSAS;
ANTHONY CLARK; NOAH MEEKS; and
LIZ PETRAY**

**INTERVENOR DEFENDANTS/
COUNTERCLAIMANTS**

**MOTION TO OPPOSE THE STATE'S MOTION TO QUASH AND FOR PROTECTIVE
ORDER**

COME NOW Intervenor Defendants ("Intervenors") for their Motion to Oppose Intervenor the State of Arkansas' (the "State") Motion to Quash and for Protective Order, state as follows:

The Motion to Quash and for Protective Order requested by the State should be denied for reasons set forth more fully in the accompanying brief.

WHEREFORE, Intervenors respectfully request that the Court deny the State's motion, and order the State to: (1) engage in a reasonable search for relevant materials (Intervenors remain willing to discuss this issue in good faith), (2) produce responsive documents that are located through such a search, and (3) then make Messrs. Hester and Ballinger available for deposition, so that this case can proceed to a decision on the merits.

Respectfully submitted this 24th day of August, 2017.

SULLIVAN & CROMWELL LLP

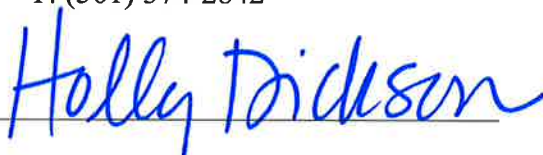
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this 24th day of August, 2017 by electronic transmission on the following counsel of record:

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