

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
PANAMA CITY DIVISION

Plaintiff B, Plaintiff J, Plaintiff S, and Plaintiff V, )  
on behalf of themselves and all others similarly )  
situated, )

Plaintiffs, )

v. )

Case No. 5:08cv79-RS-AK )

JOSEPH R. FRANCIS; MRA HOLDINGS, LLC, )  
a California limited liability company; MANTRA )  
FILMS INC., an Oklahoma corporation, d/b/a )  
"Girls Gone Wild;" and AERO FALCONS, LLC, )  
a Delaware limited liability company. )

Defendants. )

**PLAINTIFFS' MOTION TO PROTECT AND MAINTAIN PLAINTIFFS' ANONYMITY**

Plaintiffs B, J, S and V, and members of the Class and Subclasses, move this Court to protect their identifying information and to maintain their anonymity. In support of their motion, plaintiffs and members of the Class and Subclasses state:

1. Plaintiffs and members of the Class and Subclasses ("Class Plaintiffs") were minor girls when Defendants sexually exploited them when Defendants solicited and captured their images engaged in sexually explicit conduct and/or baring their breasts.

2. As set forth in the memorandum of law accompanying this motion, prosecution of their claims requires the Class Plaintiffs to reveal information of the "utmost intimacy" and Class Plaintiffs will suffer further harm if their identities are made public. Class Plaintiffs therefore request this Court to protect their identifying information and allow them to proceed anonymously.

Ex. B

3. Class Plaintiffs are not asking this Court to keep their identifying information from the Defendants. Class Plaintiffs are requesting this Court to enter an appropriate protective order. A suggestion for such a protective order is attached as Exhibit A to the Memorandum of Law in support of this motion.

4. In compliance with Local Rule 7.1(b), Plaintiffs' counsel certifies that they conferred with Defense counsel in a good faith effort to resolve by agreement the issues raised in this motion but were unsuccessful.

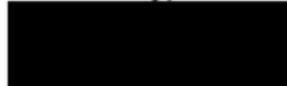
WHEREFORE, Plaintiffs B, J, S, V and members of the Class and Subclasses request this Court protect their identifying information and maintain their anonymity.

Respectfully submitted,

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and

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ATTORNEYS FOR PLAINTIFFS,  
CLASS, AND SUBCLASSES

**CERTIFICATE OF SERVICE**

The undersigned certifies that on November 13, 2008, she caused the foregoing **Plaintiffs' Motion to Protect and Maintain Plaintiffs' Anonymity** to be electronically filed with the Clerk of the Court, using the Court's CM/ECF system, which will send electronic notification of the filing to the below CM/ECF participant. Parties may access this filing through the Court's system.

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/s/ Rachael G. Pontikes