IN THE UNITED STATES COURT OF FEDERAL CLAIMS
Washington, D.C.

BID PROTEST

AIRBOSS DEFENSE GROUP, LLC, Plaintiff, v. UNITED STATES OF AMERICA, Defendant, NEW YORK EMBROIDERY STUDIO, INC. Defendant-Intervenor.	Case No. 24-cv-00365 Judge Charles F. Lettow

APPLICATION FOR ACCESS TO INFORMATION UNDER PROTECTIVE ORDER BY OUTSIDE COUNSEL

1. I, Scott E. Whitman, hereby apply for access to protected information covered by the Protective Order issued in connection with this proceeding.

2. I am an attorney with the law firm of Haynes and Boone, LLP and have been retained to represent New York Embroidery Studio, Inc., a party to this protest.

3. I am not a member of the bar of the United States Court of Federal Claims (the "Court").

4. My professional relationship with the party I represent in this proceeding and its personnel is strictly one of legal counsel. I am not involved in competitive decision-making as discussed in U.S. Steel Corp. v. United States, 730 F.2d 1465 (Fed. Cir. 1984), for or on behalf of the party I represent, any entity that is an interested party to this proceeding, or any other firm

that might gain a competitive advantage from access to the material disclosed under the Protective Order. I do not provide advice or participate in any decisions of such parties in matters involving similar or corresponding information about a competitor. This means that I do not, for example, provide advice concerning or participate in decisions about marketing or advertising strategies, product research and development, product design or competitive structuring and composition of bids, offers, or proposals with respect to which the use of Protected Information could provide a competitive advantage.

5. I identify here those attorneys in my firm who, to the best of my knowledge, cannot make the representations set forth in the preceding paragraph: NONE.

6. I identify here any member of my immediate family who is an officer or holds a management position with an interested party in the proceeding or with any other firm that might gain a competitive advantage from access to the material disclosed under the protective order: NONE.

7. I identify here instances in which I have been denied admission to a protective order, had admission revoked or been found to have violated a protective order issued by any administrative or judicial tribunal: NONE.

8. [Not applicable.]

9. I have read the Protective Order issued by the Court in this proceeding. I will comply in all respects with that order and will abide by its terms and conditions in handling any Protected Information produced in connection with the proceeding.

10. I acknowledge that a violation of the terms of the protective order may result in the imposition of such sanctions as may be deemed appropriate by the Court and in possible civil and criminal liability.

* * *

By my signature, I certify that, to the best of my knowledge, the representations set forth above are true and correct.

s/ Scott E. Whitman
Signature

April 18, 2024
Date Executed

Scott E. Whitman, Associate
Typed Name and Title

202-654-4500
Telephone Number

202-654-4501
Facsimile Number

s/ Tara D. Hopkins
Signature of Attorney of Record

April 18, 2024
Date Executed

Tara D. Hopkins, Associate
Typed Name and Title

703-847-6300
Telephone Number

703-847-6312
Facsimile Number