UNITED STATES OF AMERICA Before the SECURITIES AND EXCHANGE COMMISSION

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ADMINISTRATIVE PROCEEDING File No. 3-15967

In the Matter of

RESPONDENT LAWRENCE M.
LABINE'S MOTION FOR PROTECTIVE
ORDER PURSUANT TO RULE 322

LAWRENCE M. LABINE,

Respondent.

Respondent Lawrence M. LaBine hereby requests that the Chief Administrative Law Judge enter a protective order barring the public disclosure of certain financial and personal documents to be entered into evidence by Respondent. Pursuant to Rule 322, your honor is authorized to enter a protective order to limit identified materials from disclosure to the public. Respondent asks that his personal financial information and information related to the waiver request pursuant to Rule 630, which will be introduced both through exhibits and testimony, be so limited and subject to a protective order. The harm to Respondent through public disclosure is inherent in that the information relates to not only himself, but also his spouse and children, with details including locations frequented for transactions involving those minors. There is no benefit to public disclosure.

Respondent requests that your honor enter the protective order and include within that order exhibits 204 through 230, which relate to the waiver argument. Mr. LaBine reserves the right to supplement the list and identify additional exhibits and portions of testimony as supplemented throughout the hearing. Undersigned counsel spoke with counsel for the Division

this morning, who has expressed no objection to this request but does reserve the right to challenge any new exhibits requested to be added to the umbrella of the protective order.

RESPECTFULLY SUBMITTED this 25th day of August, 2015.

BASKIN RICHARDS PLC

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ORIGINAL and three copies of the foregoing sent via Overnight Mail and one copy faxed this 25th day of August, 2015 to:

Kevin O'Neill (202-772-9324)
Deputy Secretary
Office of the Secretary
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-2257

COPY of the foregoing sent via Electronic Mail this 25th day of August, 2015 to:

Duane K. Thompson (thompsond@sec.gov) Assistant Chief Litigation Counsel Division of Enforcement U.S. Securities and Exchange Commission 100 F. Street, N.E. Washington, DC 20549