IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRANSCENIC, INC.	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:15-cv-6434
	)	
NOKIA CORPORATION,	)	Hon. Judge John J. Tharp Jr.
NOKIA USA INC.,	)	
HERE NORTH AMERICA LLC, AND	)	
EARTHMINE, INC.	)	
	)	
Defendants.	)	

PLAINTIFF'S MOTION TO FILE EXHIBITS TO ITS MOTION TO COMPEL RESPONSES TO INTERROGATORIES UNDER SEAL

Plaintiff Transcenic, Inc. ("Transcenic") seeks to file certain exhibits of its Motion To Compel Responses To Interrogatories under seal pursuant to Local Rule 5.8, Local Patent Rule 1.4, Local Patent Rule Appendix B ¶ 7, and the Parties Stipulated Protective Order (D.I. 39 at ¶ 15). These exhibits contain documents marked by HERE North America LLC ("HERE") as "Attorneys Eyes Only." Specifically, these documents contain information relating to web metrics for one of its websites, director and officer resignations, meetings of managers relating to financial issues, corporate bylaws, certificates of merger, and certificates of incorporation. Transcenic has concurrently filed public, redacted versions of these exhibits, as required by Local Rule 26.2 and Local Patent Rule Appendix B ¶ 7(a). Transcenic does not take the position that these documents warrant being filed under SEAL, but is nonetheless required to file these documents under SEAL pursuant to the Parties' Protective Order (D.I. 39 at ¶ 8).

In light of the above, Plaintiff respectfully requests that the Court grant its motion to file exhibits to its Motion to Compel Responses To Interrogatories under seal.

Respectfully submitted,

Date: February 17, 2016

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Counsel for Plaintiff, Transcenic, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2016, I served the foregoing **PLAINTIFF'S MOTION TO FILE EXHIBITS TO ITS MOTION TO COMPEL RESPONSES TO INTERROGATORIES UNDER SEAL** via email on all counsel of record.

Date: February 17, 2016

/s/ Eric L. Broxterman
Eric L. Broxterman