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

TRANSCENIC, INC. Plaintiff, v. NOKIA CORPORATION, NOKIA USA INC. AND HERE NORTH AMERICA LLC EARTHMINE, INC.	Case No.: 1:15-cv-006434 **The Honorable John J. Tharp, Jr.**

DEFENDANT HERE NORTH AMERICA LLC'S MOTION TO FILE EXHIBITS TO ITS RESPONSE TO PLAINTIFF'S MOTION TO COMPEL RESPONSES TO INTERROGATORIES UNDER SEAL

Defendant Here North America LLC seeks to file certain exhibits to its Response to Plaintiff Transcenic's Motion to Compel Responses to Interrogatories under seal pursuant to Local Rule 5.8, Local Rule 26.2, Local Patent Rule Appendix B ¶ 7, and the parties' Protective Order (Docket No. 39 ¶ 15). These exhibits contain documents marked as "Attorney Eyes Only" as they relate to non-public commercially sensitive information that should not be included in the public domain. Specifically, these documents contain, among other things, highly confidential internal revenue reports, strategy materials and hardware specifications. Here North America LLC has simultaneously filed public, redacted versions of the same exhibits, as required by Local Rule 26.2 and Local Patent Rule Appendix B ¶ 7(a).

WHEREFORE, Defendant Here North America LLC hereby moves this Court for leave to file under seal certain exhibits to its Response to Plaintiff Transcenic's Motion to Compel Responses to Interrogatories.

Dated: February 26, 2016

Respectfully submitted,

/s/ Deborah J. Swedlow

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CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2016, I served the foregoing **Defendant Here North America LLC's Motion To File Exhibits To Its Response To Plaintiff's Motion To Compel Responses To Interrogatories Under Seal** on all counsel of record by filing the document on the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Deborah J. Swedlow

Deborah J. Swedlow
Counsel for Defendant HERE North America LLC