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

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

DEFENDANT NOKIA CORPORATION AND DEFENDANT NOKIA USA INC.'S MOTION TO FILE MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(b)(6), OR IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT, STATEMENT OF MATERIAL FACTS, AND CERTAIN EXHIBITS THERETO UNDER SEAL

Defendant Nokia Corporation and Defendant Nokia USA Inc. seek to file the Memorandum of Law in Support of their Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6), or in the Alternative, Motion for Summary Judgment, the associated Statement of Material Facts, and certain exhibits thereto, 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 highly confidential technical information and a highly confidential purchase agreement. Nokia Corporation and Nokia USA Inc. have 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 Nokia Corporation and Defendant Nokia USA Inc. hereby move this Court for leave to file under seal their Memorandum of Law in Support of their Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6), or in the Alternative, Motion for Summary Judgment, the associated Statement of Material Facts, and certain exhibits thereto.

Dated: February 29, 2016

Respectfully submitted,

/s/ Allison H. Altersohn

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Attorneys For Defendants
Nokia Corporation and Nokia USA Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system this the 29th day of February, 2016.

/s/ Allison H. Altersohn
Allison H. Altersohn