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 DOCUMENTS UNDER SEAL

Defendant Nokia Corporation and Defendant Nokia USA Inc. seek to file their Reply Brief in Support of Defendant Nokia Corporation and Defendant Nokia USA Inc.'s Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6), or in the Alternative, Motion for Summary Judgment, their Objections and Reply to Plaintiff Transcenic, Inc.'s Response to Defendants' Statement of Facts, and their Response to Plaintiff Transcenic, Inc.'s Local Rule 56.1 Statement of Additional Material Facts 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 documents contain information that has been designated by HERE North America LLC, Nokia Corporation, or Nokia USA Inc. 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, references to 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 documents, 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 Reply Brief in Support of Defendant Nokia Corporation and Defendant Nokia USA Inc.'s Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6), or in the Alternative, Motion for Summary Judgment, their Objections and Reply to Plaintiff Transcenic, Inc.'s Response to Defendants' Statement of Facts, and their Response to Plaintiff Transcenic, Inc.'s Local Rule 56.1 Statement of Additional Material Facts.

Dated: March 22, 2016

Respectfully submitted,

/s/ Allison H. Altersohn

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ATTORNEYS FOR DEFENDANTS
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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 22nd day of March, 2016.

/s/ Allison H. Altersohn
Allison H. Altersohn