

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of
TIME CLOCK SOLUTIONS, LLC
To Provide Resold Local and Interexchange
Services throughout the State of Ohio

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Case No. _____ - _____ -TP-ACE

MOTION FOR A PROTECTIVE ORDER

Pursuant to Ohio Administrative Code Chapter 4901-1-02(E), TIME CLOCK SOLUTIONS, LLC (hereinafter "TIME CLOCK") respectfully requests that the Ohio Public Utilities Commission ("Commission") enter an Order to protect the confidentiality of its financial information submitted as **Exhibit I** (cross referenced in Exhibit J) to its Application for a Certificate of Public Convenience and Necessity to provide Resold Local and Interexchange Services in the State of Ohio.

TIME CLOCK SOLUTIONS, LLC is a privately held limited liability company and its financial statements are not part of the public record in any jurisdiction. Further, TIME CLOCK submits that its financial information constitutes trade secrets under Ohio law, the disclosure of such information would be detrimental to TIME CLOCK in the competitive telecommunications market as competitors may obtain sensitive financial and business plan information, and non-disclosure of its financial information is consistent with Title 49 of the Ohio Code. Accordingly, TIME CLOCK requests the Commission treat **Exhibit I** as confidential and not disclose the financial information or any information contained therein to any person not responsible for reviewing its application.

Respectfully submitted,

TIME CLOCK SOLUTIONS, LLC

By:


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Its Attorney

Dated: _____

12.4.2018

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/5/2018 12:28:56 PM

in

Case No(s). 18-1804-TP-ACE

Summary: Motion Motion For A Protective Order electronically filed by Lance Steinhart on behalf of TIME CLOCK SOLUTIONS, LLC and Bison Jacobson, Barbara