

FILE

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

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In the Manner of the Application of)
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Magellan Hill Technologies, LLC)
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To Receive a Certificate Authorizing it as a)
CTS Provider)
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Case No. 09-844-TPACE

VERIFIED MOTION FOR PROTECTIVE ORDER

Magellan Hill Technologies, LLC ("Magellan" or "Applicant"), by and through undersigned counsel, hereby moves the Commission, to issue a Protective Order covering the financial statements which are filed herewith under seal.

The attached financial statements contain highly sensitive and proprietary information. In a competitive market, knowledge of a competitor's financial status can be used to obtain an unfair business advantage. Allowing the Applicant's competitors access to this information could put the Applicant at a competitive disadvantage relative to other companies in the competitive telecommunications industry, especially if these competitors are not required to disclose similar information about their businesses.

None of the information for which confidentiality is claimed can be found in any format in any other public document. While the information provided is expected to assist the Commission in reviewing the merits of the above captioned Application, the general public has no direct or substantive interest in the information. Moreover, the risk of harm to Applicant from disclosure of such information are real and direct, and disclosure would therefore be contrary to the public interest.

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Applicant submits the attached confidential financial information under seal and filed separately from the original and the filed copies of the Application.

Applicant respectfully moves that the Commission issue a protective order with respect to the attached financial information and protect that information from release to persons and parties outside of the Commission for a period of not less than three (3) years from the date of filing.

By: 

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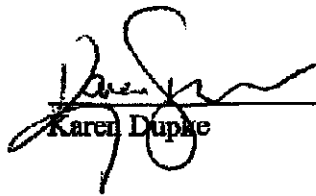
COUNSEL FOR

MAGELLAN HILL TECHNOLOGIES, LLC

Dated: September 22, 2009

VERIFICATION

I, Karen Dupke, state that I am Executive Vice President of Magellan Hill Technologies, LLC ("Magellan"); that I am authorized to make this Verification on behalf of Magellan; that the foregoing filing was prepared under my direction and supervision; and that, with respect to Magellan, the contents are true and correct to my knowledge, information and belief.



Karen Dupke