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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
OneCommunity for New Operating Authority) Case No. 11 - 4253 - TP - ACE

MOTION FOR PROTECTIVE ORDER

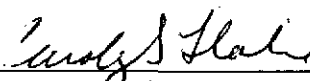
Pursuant to Ohio Adm.Code 4901-1-24(D), OneCommunity hereby moves the Commission for a protective order regarding the confidential information that it is filing contemporaneously with this Motion, specifically Exhibit D-2 (Financial Statements) of its simultaneously-filed Application for New Operating Authority (the "Confidential Information").

OneCommunity requests that the Commission issue such order as is necessary to protect the Confidential Information. Non-disclosure of the information is not inconsistent with the purposes of Title 49 of the Revised Code because the Commission and its Staff will have full access to the Confidential Information in order to fulfill their statutory obligations.

The bases for this Motion may be found in the attached Memorandum of Support.

Respectfully submitted,

ONECOMMUNITY


By: Carolyn S. Flahive (0072404)
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Its Counsel

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MEMORANDUM IN SUPPORT OF
MOTION FOR PROTECTIVE ORDER

OneCommunity is concurrently filing an Application for New Operating Authority (the “Application”) attached to which as Exhibit D-2 are financial statements (the “Confidential Information”). Because OneCommunity considers the financial statements to be confidential, they have been filed under seal as required by Ohio Adm.Code 4901-1-24(D).

The Confidential Information includes detail about OneCommunity's finances that would be of significant interest to competitors. Consequently, that data constitutes confidential information that should not be disclosed in the public record.

The Confidential Information constitutes trade secrets as defined in Revised Code §1333.61(D). The information (1) derives economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use, and (2) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

The Ohio Supreme Court adopted six factors to be used in determining whether a trade secret claim meets the statutory definition:

- 1) The extent to which the information is known outside the business;
- 2) The extent to which it is known to those inside the business, i.e., by the employees;
- 3) The precautions taken by the holder of the trade secret to guard the secrecy of the information;
- 4) The savings effected and the value to the holder in having the information as against competitors;
- 5) The amount of effort or money expended in obtaining and developing the information; and

6) The amount of time and expense it would take for others to acquire and duplicate the information.

State ex rel. The Plain Dealer v. Ohio Dept. of Ins., 80 Ohio St.3d 513, 524-525 (1997).

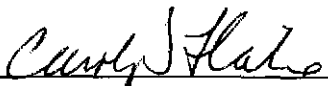
The Confidential Information is not known outside of OneCommunity and is known within OneCommunity only to senior managers and a limited number of employees with a particular need to know. OneCommunity has taken precautions to guard the secrecy of the Confidential Information by limiting its dissemination. Further, OneCommunity expended a significant amount of time and money in developing the Confidential Information. Disclosure of the Confidential Information would harm OneCommunity's competitive position in the marketplace. (See attached Affidavit of Brett Lindsey, Chief Operating Officer, OneCommunity.)

The protection of trade secret information from public disclosure is consistent with the purposes of Title 49 because the Commission and its Staff have access to the information. Granting protection of the Confidential Information requested herein will not impair the Commission's regulatory responsibilities.

Confidential treatment of Exhibit D-2 to the Application is therefore both appropriate and required by Ohio law and the Commission's rules. For the foregoing reasons, OneCommunity prays that its Motion for Protective Order be granted.

Respectfully submitted,

ONECOMMUNITY


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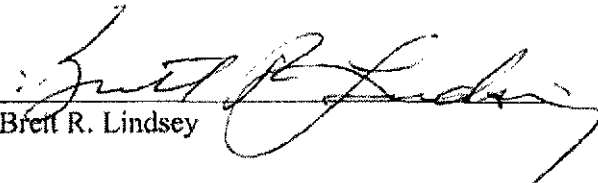
Its Counsel

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1. I am Chief Operating Officer of OneCommunity; 800 West St. Clair Avenue, 2nd Floor, Cleveland, Ohio 44113. I am authorized to make this Affidavit on behalf of OneCommunity, and do so in the ordinary discharge of my responsibilities.
2. I have personal knowledge of all relevant matters pertaining to the Application for New Operating Authority (the "Application") that OneCommunity filed with the Public Utilities Commission of Ohio on July 11, 2011, including Exhibit D-2.
3. OneCommunity considers Exhibit D-2 (the "Financial Information") to be confidential.
4. The Financial Information is not otherwise available to the general public, and includes detail about OneCommunity's finances that would be of significant interest to competitors. Consequently, OneCommunity is requesting that the Financial Information not be disclosed to the public.
5. The Financial Information derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means, by other persons who can derive economic value from its disclosure or use.

6. The Financial Information is provided only to OneCommunity's senior management and a restricted list of employees who have a particular need to know the Information.
7. The Financial Information is indicative of OneCommunity's current and future business plans and, therefore, public disclosure of the Financial Information would place OneCommunity at a competitive and economic disadvantage.
8. The Financial Information is the subject of efforts by OneCommunity that are reasonable under the circumstances to maintain its secrecy.
9. OneCommunity has expended a significant amount of time and money to develop the Financial Information. Disclosure of the Financial Information would harm OneCommunity's competitive position in the marketplace.


FURTHER AFFIANT SAYETH NAUGHT.


Brett R. Lindsey

Sworn to before me and subscribed in my presence this 8th day of July 2011.



BEVERLY J GOBELI
Notary Public
In and for
the State of Ohio
My Commission Expires
January 22, 2013


Notary Public