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BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the )  
Application of: )  
Unite Private Networks, L.L.C. )  
)  
To Provide Competitive Facilities-Based )  
and Resold Local Services )  
throughout the State of Ohio )

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Case No. 11-4814-TP-AGE

MOTION FOR A PROTECTIVE ORDER

Pursuant to Ohio Administrative Code Chapter 4901-1-02(E), Unite Private Networks, L.L.C. (hereinafter "Unite Private Networks") respectfully requests that the Ohio Public Utilities Commission ("Commission") enter an Order to protect the confidentiality of its financial information submitted as Exhibit J to its Application to provide Facilities-Based and Resold Local Services throughout the State of Ohio.

Unite Private Networks, L.L.C. is a privately held Limited Liability Company and its financial statements are not part of the public record in any jurisdiction. Further, Unite Private Networks submits that its financial information constitutes trade secrets under Ohio law, the disclosure of such information would be detrimental to Unite Private Networks 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, Unite Private Networks requests the Commission treat Exhibit J as confidential and not disclose the financial information or any information contained therein to any person not responsible for reviewing its application.

Respectfully submitted,

Unite Private Networks, L.L.C.

By: \_\_\_\_\_

Lance J.M. Steinhart  
Lance J.M. Steinhart, P.C.  
1725 Windward Concourse, Suite 150  
Alpharetta, Georgia 30005  
(770) 232-9200  
(770) 232-9208 (Fax)  
[lsteinhart@telecomcounsel.com](mailto:lsteinhart@telecomcounsel.com) (E-mail)

Dated: 8/16/11

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