

avoid unnecessary prejudice to parties not participating in this lawsuit. Other information, including financial commercially sensitive and trade secret information, warrants protection due to its proprietary, non-public nature. Fed. R. Civ. P. 26(c)(7); *see also In re Coordinated Pretrial Proceedings in Petroleum Products Antitrust Litig.*, 101 F.R.D. 34, 41 (C.D. Cal. 1984) (public interest in disclosure of private information at its weakest during discovery) (citing *Tavouleras v. Washington Post*, 724 F.2d 1010, 1016 (D.C. Cir. 1984)); *Tavouleras v. Piro*, 93 F.R.D. 24, 29 (D.D.C. 1981).

Pursuant to Local Rule 7(m), counsel for defendant hereby certifies that she has conferred with counsel for plaintiff and has obtained plaintiff's consent to the filing of the instant motion and to the entry of the proposed protective order accompanying this motion.

WHEREFORE, the parties respectfully request the entry of the proposed protective order filed herewith.

Dated: February 25, 2008

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

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documents produced that CBS Radio/WJFK designates as "Confidential" will be covered by the protective order.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of February, 2008, I directed that true and correct copies of the foregoing Consent Motion for Protective Order be delivered by electronic mail (ECF) and first class mail, postage pre-paid, to the following:

Thomas L. McCally, Esq.
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