

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ILLINOIS COMPUTER RESEARCH, LLC.,)	
<i>Plaintiff and Counterclaim Defendant,</i>)	
)	
v.)	
)	
FISH & RICHARDSON P.C.,)	Case No. 07 C 5081
<i>Defendant, Counterclaimant and</i>)	
<i>Third-Party Plaintiff,</i>)	Honorable Rebecca R. Pallmeyer
)	
v.)	Magistrate-Judge Maria Valdez
)	
SCOTT C. HARRIS,)	
<i>Third-Party Defendant and</i>)	
<i>Counterclaimant,</i>)	
)	
v.)	
)	
FISH & RICHARDSON P.C.,)	
Defendant, Counterclaimant, Third-Party)	
Plaintiff and Counterclaim Defendant.)	

MOTION FOR LEAVE TO FILE UNDER SEAL

Illinois Computer Research, LLC (“ICR”) and Scott Harris (“Harris”) respectfully seek the Court’s permission to file under seal the following papers:

- **Harris and ICR’s Motion to Compel Documents Improperly Withheld On The Ground Of Attorney-Client Privilege And Work-Product Immunity.**
- **Exhibit B** -- email produced by defendant, Fish & Richardson.
- **Exhibit C** -- pages 39, 41, 45, 46, 113 and 114 of April 14, 2008 Rough Deposition Transcript of John Steele.
- **Exhibit D** -- pages 5, 6 and 128 of April 23, 2008 Rough Deposition Transcript of Kathi Lutton.
- **Exhibit E** – emails produced by defendant, Fish & Richardson

Harris and ICR’s Motion To Compel contains information that has been designed as Confidential under the Protective Order. Exhibit A-E have been designated as

Confidential under the Protective Order by the defendant Fish & Richardson. Accordingly, ICR and Harris seek leave to file above referenced documents under seal consistent with the Protective Order entered in this case and the Local Rules of this Court.

For the reasons stated, ICR and Harris respectfully request this Court grant their motion for leave to file under seal.

Respectfully submitted,

/s/ Paul K. Vickrey
Raymond P. Niro
Paul K. Vickrey
Niro, Scavone, Haller & Niro
181 West Madison, Suite 4600
Chicago, Illinois 60602-4515
(312) 236-0733
Fax: (312) 236-3137

Attorneys for Illinois Computer Research, LLC
and Scott C. Harris

CERTIFICATION OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Motion for Leave to File Under Seal** was electronically filed with the Clerk of Court using CM/ECF system, which will send notification by electronic mail to the following:

David J. Bradford - dbradford@jenner.com

Eric A. Sacks - esacks@jenner.com

Daniel J. Weiss - dweiss@jenner.com

Terrence J. Truax - ttruax@jenner.com

Jenner & Block LLP

330 N. Wabash Avenue

Chicago, IL 60611

(312) 222-9350

Counsel for Fish & Richardson, P.C.

on April 30, 2008.

/s/ Paul K. Vickrey _____