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

ILLINOIS COMPUTER RESEARCH, LLC., Plaintiff and Counterclaim Defendant,)))
v.))
FISH & RICHARDSON P.C., Defendant, Counterclaimant, Third-Party Plaintiff and Counterclaim Defendant,)) Civil Action No. 07 C 5081)
V.	Honorable Rebecca R. Pallmeyer
SCOTT C. HARRIS, MEMORY CONTROL) Magistrate-Judge Maria Valdez)
ENTERPRISE, LLC, BARTEX RESEARCH, LLC, INNOVATIVE BIOMETRIC TECHNOLOGY, LLC,))
PARKER INNOVATIVE TECHNOLOGIES, LLC, VIRGINIA INNOVATIVE TECHNOLOGY, LLC,))
INNOVATIVE PATENTED TECHNOLOGY, LLC	,))
AND ANY JOHN DOE SHELL ENTITIES, Third-Party Defendants.	ý)

MOTION FOR LEAVE TO FILE UNDER SEAL

Illinois Computer Research, LLC ("ICR") and Scott Harris ("Harris") and the thirdparty defendants respectfully seek the Court's permission to file under seal the following papers:

• Scott Harris's, ICR's and Third-Party Defendants' Joint Motion to Compel Basic Discovery from Fish, including Exhibits C, E, G, H, J, K, L, M.

The Motion contains information that has been designed as Confidential under the Protective Order by the defendant Fish & Richardson. Accordingly, ICR, Harris and the third-party defendants seek leave to file their motion to compel and Exhibits C, E, G, H, J, K, L, M under seal consistent with the Protective Order entered in this case and the Local Rules of this Court.

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

Respectfully submitted,

/s/ Laura A. Kenneally

Raymond P. Niro
Paul K. Vickrey
Richard B. Megley, Jr.
Laura A. Kenneally
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 June 19, 2008.

/s/ Laura A. Kenneally