

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

LIMITNONE LLC,)	Hon. Blanche Manning
)	
Plaintiff,)	Case No. 08-cv-4178
)	
vs.)	Magistrate Judge Cox
)	
GOOGLE INC,)	
)	
Defendant.)	

**DEFENDANT GOOGLE INC.'S MOTION FOR RESTRICTING ORDER PURSUANT
TO L.R. 26.2, AND FOR LEAVE TO FILE UNDER SEAL AN UNREDACTED COPY OF
EXHIBIT B TO ITS MOTION TO DISMISS PURSUANT TO L.R. 5.8**

Defendant Google Inc. (“Google”) respectfully moves this Court pursuant to L.R. 5.8 and 26.2(b) for a restricting order permitting Google to file under seal an unredacted copy of Exhibit B to its concurrently filed Motion to Dismiss for Improper Venue under F.R.C.P. 12(b)(3) or, in the Alternative, Motion to Transfer under 28 U.S.C. § 1404(a) (hereinafter “Motion to Dismiss”). In support of this Motion, Google states as follows:

1. Exhibit B to Google's Motion to Dismiss is a redacted version of a contract between Plaintiff LimitNone and Google, entitled “Google Enterprise Professional Agreement” (the “GEP Agreement”), executed by LimitNone on or around March 9, 2007. Paragraph 6 of the GEP Agreement specifically states that “the terms of this Agreement” shall be considered “Confidential Information.” Google considers the proprietary terms of the GEP Agreement to be confidential, and takes steps to ensure that those terms remain confidential.
2. Because the terms of the GEP Agreement are confidential and proprietary, Google now seeks a restricting order pursuant to L.R. 26.2 permitting it to file the complete and unredacted GEP Agreement under seal.

3. Google submits that this motion is made in good faith and is not meant to restrict the public's access to court process or to information.

WHEREFORE, for the reasons set forth in Google's Memorandum of Law in Support hereof, Google respectfully requests that this Court issue a restricting order pursuant to L.R. 26.2 granting Google leave to file under seal an unredacted copy of Exhibit B to its Motion to Dismiss.

DATED: July 30, 2008

Respectfully submitted,
GOOGLE INC.

By: /s/ Rachel M. Herrick
One of Its Attorneys

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CERTIFICATE OF SERVICE

I, Rachel M. Herrick, an attorney, certify under penalty of perjury that I caused a copy of the forgoing document to be served on all counsel of record via the Court's CM/ECF online filing system this 30th day of July, 2008.

/s/ Rachel M. Herrick