

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

FOLLETT HIGHER EDUCATION)
GROUP, LTD.,)
)
Plaintiff,)
)
v.)
)
BOOKRENTER.COM, INC.)
)
Defendant.)

11 CH 285 19

No. 11-CH-

MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Follett Higher Ed Group, Ltd., by its undersigned counsel, respectfully moves this Court for leave to file its Verified Complaint for Declaratory and Injunctive Relief and accompanying exhibits (the "Complaint") under seal. In support of its motion, Follett states as follows:

1. The underlying action relates to a contract between Follett and BookRenter.
2. The contract at issue contains a confidentiality clause. The confidentiality clause states that the information contained in the contract is confidential, and forbids Follett and BookRenter from disclosing the terms and conditions of the agreement, subject only to certain exceptions, none of which apply here.
3. The contract is an exhibit to the Complaint, and portions of the contract and quoted and discussed in detail throughout the Complaint.
4. Not only is Follett forbidden by the confidentiality clause from revealing the information contained in the contract, but the contract also contains confidential and proprietary information about Follett that Follett does not want to be public.
5. Accordingly, Follett respectfully requests that leave be granted leave to file the Complaint and accompanying exhibits under seal, that the Order be effective immediately, and

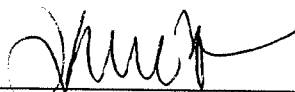
that the Complaint be treated as confidential and not available to persons other than the parties, their counsel of record, the Cook County Sheriff's Office and other law enforcement personnel if necessary to carry out the terms of any order issued in this case, and other designated individuals as the Court deems appropriate, or as mutually agreed upon by the parties to this action.

WHEREFORE, Plaintiff Follett Higher Ed Group, Ltd., hereby respectfully prays for an Order to Seal Records to seal Follett's Verified Complaint for Declaratory and Injunctive Relief and accompanying exhibits, and any other such relief appropriate.

Dated: August 11, 2011

Respectfully submitted,

FOLLETT HIGHER ED GROUP, LTD.,

By: 
One of Its Attorneys

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