

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

EASTERN DIVISION)	
TIMELINES, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 11 CV 6867
)	
FACEBOOK, INC.,)	Jury Trial Demanded
)	
Defendant.)	

**PLAINTIFF TIMELINES, INC.'S MOTION FOR
NARROW RELIEF FROM THE PROTECTIVE ORDER**

Plaintiff/Counter-Defendant Timelines, Inc. (“Timelines”), for the reasons set forth in its accompanying memorandum of law, seeks narrow relief from the Court’s April 24, 2012 Protective Order. In particular, Timelines is seeking relief to permit its President and corporate representative, Brian Hand, to view a few revenue documents Facebook has designated as Highly Confidential – Outside Counsel Only. These documents, as yet unknown to Mr. Hand, form part of the claim for relief Timelines seeks in this case. Without knowledge of these documents, Mr. Hand cannot meaningfully participate in the trial or in pre-trial discussions (including any settlement questions the Court may direct to Timelines).

WHEREFORE, for the reasons stated herein and as set forth more fully in the accompanying Memorandum of Law, Timelines respectfully moves for the following narrow relief from the Protective Order:

- that Brian Hand, President of Timelines, be permitted to review Facebook documents FB-TL 0011912 – 11919;
- that Mr. Hand be permitted to review the entirety of Plaintiff’s and Defendant’s expert damage reports (an opening and response-to-rebuttal report from Timelines, its expert David Haas, and a rebuttal report from Facebook, its expert being Christopher J. Bokhart); and

- such further relief as is just and appropriate depending on the issues as briefed and argued.

Dated: January 30, 2013

Respectfully submitted,

TIMELINES, INC.

By: /s/ Douglas A. Albritton
One of its Attorneys

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