

## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

|   | -                                     |
|---|---------------------------------------|
| BRIDGESTONE AMERICAS, INC.,                     |                                       |
| Plaintiff,                                      |                                       |
| VS.   |                                       |
| INTERNATIONAL BUSINESS<br>MACHINES CORPORATION, |                                       |
| Defendant.                                      | Civil Docket No. 3:13-CV-1196         |
|   | JURY DEMANDED                         |
| INTERNATIONAL BUSINESS<br>MACHINES CORPORATION, | Judge Sharp<br>Magistrate Judge Brown |
| Counterclaim Plaintiff,                         |                                       |
| VS.   |                                       |

**BRIDGESTONE AMERICAS, INC. and BRIDGESTONE CORPORATION,** 

**Counterclaim Defendants.** 

## **IBM'S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Defendant International Business Machines Corporation ("IBM") moves this Court for leave to file its Reply in Support of its Motion to Dismiss Bridgestone's Claims, as well as exhibits 1 - 6 thereto under seal pursuant to Federal Rule of Civil Procedure 5.2(d) and Administrative Order No. 167, Section 5.07. In support of this motion, IBM states as follows:

1. IBM's Reply in Support of its Motion to Dismiss Bridgestone's Claims, as well as exhibits 1 - 6 thereto contain information from documents and excerpts from deposition transcripts designated as confidential by Plaintiff/Counterclaim Defendant Bridgestone Americas, Inc. under the Amended Protected Order. *See* Dkt. 141.