

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF WEST VIRGINIA**

- MARTINSBURG

**BLINGVILLE, LLC, a West Virginia
Limited Liability Company,
Plaintiff,**

v.

**ZYNGA INC., a Delaware corporation; and
ZYNGA GAME NETWORK INC., a
Delaware corporation,
Defendants .**

CASE NO. 3:11CV4

**ZYNGA INC., a Delaware corporation,
Counterclaimant,**

v.

**BLINGVILLE, LLC, a West Virginia
Limited Liability Company,
Counterdefendant**

MOTION FOR PROTECTIVE ORDER

COMES NOW Zynga, Inc., (hereinafter “Zynga”) by and through its counsel, and moves pursuant to Rule 26(c) of the Federal Rules of Civil Procedure for a Protective Order and sets forth its grounds for this Motion as follows:

1. Zynga, as part of its disclosure requests and anticipated discovery, is producing materials that encompass trade secrets or confidential research, development and commercial information which concerns, among other things, certain proprietary business and trade secrets. Zynga requests that the produced confidential information be protected to avoid potential business damage.

{T0467008.1}

2. Zynga has attached a proposed Protective Order for the Court's consideration under Rule 26(c)(1)(G & H) which authorizes the protection of information for the reasons set forth herein. The proposed Order seeks to protect all parties as discovery proceeds. Zynga further represents to the Court that Zynga has attempted to confer with counsel for Plaintiff in good faith and obtain a Stipulation to entry of a Protective Order; and sent a copy of the proposed Order. However, Zynga's counsel has not heard back from Plaintiff's counsel.


WHEREFORE, for the reasons set forth herein, Zynga requests the Court to enter the Order protecting the information sought to be protected by the parties as described in the proposed Protective Order, or such other Order as the Court may deem appropriate to afford the parties' appropriate protection for the exchange of confidential and commercial information.

Respectfully submitted,

ZYNGA INC.

By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of this *Motion for Protective Order* was electronically filed with the Court and a copy thereby sent electronically this 9th day of January, 2012, to:

Michael J. Novotny (WV Bar No. 5566)
36 Bakerton Road
Harpers Ferry, West Virginia 25425
Counsel for Plaintiff/Counter-Defendant



William J. Powell