

FILED

BEFORE THE PUBLIC SERVICE COMMISSION DEC - 6 2000

OF THE STATE OF MISSOURI

Missouri Public Service Commission

IN THE MATTER OF THE APPLICATION )  
 OF EVEREST MIDWEST LICENSEE LLC )  
 FOR AUTHORITY TO PROVIDE BASIC )  
 LOCAL TELECOMMUNICATIONS )  
 SERVICES AND TO PROVIDE )  
 INTRASTATE INTEREXCHANGE AND )  
 NON-SWITCHED LOCAL EXCHANGE )  
 TELECOMMUNICATIONS SERVICES )  
 WITHIN THE STATE OF MISSOURI )  
 )  
 )  
 )

Case No. TA-2001-350

**MOTION OF EVEREST MIDWEST LICENSEE LLC  
FOR PROTECTIVE ORDER**

Comes now Everest Midwest Licensee LLC ("Everest Midwest"), and moves the Commission pursuant to 4 C.S.R. 240-2.080(13), to issue a protective order in this matter with respect to Everest Midwest's financial information provided in Confidential Exhibit C to its Application for a Certificate of Service Authority and for Competitive Classification. In support of its motion, Everest Midwest states as follows:

1. In its Application for a Certificate of Service Authority and for Competitive Classification, Everest Midwest seeks Commission authority to provide basic local telecommunications, local exchange telecommunications, and interexchange telecommunications services on a competitive basis in Missouri. In support of its Application, Everest Midwest has filed Confidential Exhibit C, which contains competitively sensitive information concerning Everest Midwest's financial condition.

2. Everest Midwest requests that its financial statements be treated as proprietary documents, in that release of this information to the public could competitively harm and disadvantage Everest Midwest.

3. The financial statements are private and confidential financial and business information and, therefore, constitute proprietary information entitled to protection from disclosure under 4 C.S.R. 240-2.080(13).

WHEREFORE, Everest Midwest Licensee LLC respectfully requests that the Commission issue its standard protective order in this proceeding with respect to the financial statements attached to Everest Midwest Licensee LLC's Application as Confidential Exhibit C.

Respectfully submitted,



Mark P. Johnson                      MO BAR #30740  
Lisa C. Creighton                    MO BAR #42194  
Sonnenschein Nath & Rosenthal  
4520 Main Street, Suite 1100  
Kansas City, MO 64111  
(816) 932-4400 Telephone  
(816) 531-7545 Facsimile

ATTORNEY FOR APPLICANT  
EVEREST MIDWEST LICENSEE LLC

**VERIFICATION**


STATE OF MISSOURI     )  
  ) ss.  
COUNTY OF JACKSON    )

COMES NOW Lisa C. Creighton, being of lawful age and duly sworn, swears and affirms as follows:

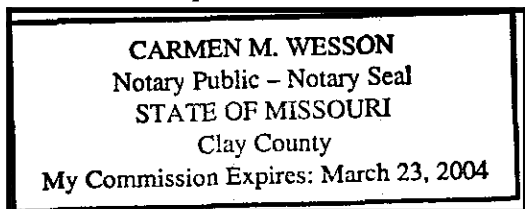
1. My name is Lisa C. Creighton, and I am an attorney for Everest Midwest Licensee LLC. In that capacity, I am authorized to verify this Motion and the information contained therein on behalf of Everest Midwest Licensee LLC.
2. The information contained in the Motion is true and accurate to the best of my knowledge and belief.

  
\_\_\_\_\_  
Lisa C. Creighton

Subscribed and sworn to before me this 5<sup>th</sup> day of December, 2000.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 5<sup>th</sup> day of December, 2000, two true and correct copies of the above and foregoing was mailed, postage prepaid, to:

Michael Dandino  
Office of Public Counsel  
Missouri Public Service Commission  
200 Madison Street  
Suite 650  
Jefferson City, Missouri 65101

With one copy being mailed postage prepaid, on the same date to:

William K. Haas  
Office of General Counsel  
Missouri Public Service Commission  
200 Madison Street  
Suite 800  
Jefferson City, Missouri 65101



ATTORNEY FOR APPLICANT  
EVEREST MIDWEST LICENSEE LLC