## BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of:	)	
Joint Application of Sprint Communications	)	Case No. TO-2008-0413
Company, L.P. and STi Prepaid, LLC for	)	
Authority to Transfer Certain Assets	)	

## **JOINT MOTION FOR PROTECTIVE ORDER**

COME NOW STi Prepaid, LLC ("STi Prepaid") and Sprint Communications Company, L.P. ("Sprint") pursuant to Rule 4 CSR 240-2.085 and hereby move the Commission to issue a standard protective order on the following grounds:

- 1. STi Prepaid and Sprint have herewith filed a Joint Application for Authority to Transfer Certain Assets.
- 2. The Commission has recognized in numerous dockets that there is a genuine need to protect certain confidential information from disclosure. The issuance of protective orders in prior cases has provided a sound method for submitting and exchanging confidential information in pleadings and discovery.
- 3. In this case, it is likely that certain information that is competitively sensitive and should be protected against public disclosure to protect STi Prepaid's and Sprint's legitimate business interests and prevent competitive harm will have to be submitted or exchanged. None of the information for which a legitimate claim of confidentiality can be made would be found in any format in any public document.
  - 4. The Commission should establish its standard protective order.

WHEREFORE, STi Prepaid, LLC and Sprint Communications Company, L.P., respectfully request the Commission to issue a protective order in this proceeding.

CURTIS, HEINZ, GARRETT & O'KEEFE, P.C.

/s/ Leland B. Curtis

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## **Certificate of Service**

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 27th day of June, 2008, by placing same in the U.S. Mail, postage paid and by fax transmission.

/s/ Leland B. Curtis

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