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June 12, 2018

Ms. Julie Orchard, Secretary  
Public Service Commission of Utah  
Heber M. Wells Building  
160 East 300 South  
Salt Lake City, Utah 84111

*Re:* In the Matter of the Application of Veracity Communications, Inc. For a Certificate of Public Convenience and Necessity to Provide Facilities-Based Local Exchange Service within the State of Utah, Docket No. \_\_\_\_\_.

Dear Ms. Orchard:

Please find enclosed the original and eight copies of the Motion for Protective Order and the form of Protective Order filed in connection with the above-referenced Docket.

Electronic versions of the Motion for Protective Order and form thereof have been provided via email.

If you have any questions concerning the above, please feel free to contact me at your convenience.

Very truly yours,

BLACKBURN & STOLL, LC

Stanley K. Stoll

encl.

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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In the Matter of the  
Application of  
Veracity  
Communications,  
Inc. For a Certificate  
of Public  
Convenience and  
Necessity to Provide  
Facilities-Based  
Local Exchange  
Service within the  
State of Utah

Motion for Protective Order

Docket No.: \_\_\_\_\_

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Veracity Communications, Inc. (“Veracity Communications”) hereby moves the Public Service Commission of Utah (the "Commission") to enter into a Protective Order in the form attached hereto. The grounds for this Motion are as follows:

1. Veracity Communications anticipates filing its Application with the Commission for a Certificate of Public Convenience and Necessity to Provide Facilities-Based Local Exchange Services within the State of Utah.

2. Veracity Communications anticipates that the Application will contain information belonging to it which constitutes trade secrets, or are proprietary or confidential in nature.

3. The entry of the proposed Protective Order will expedite the filing of the Application as well as the production of documents and other information, and will afford the necessary protection to valuable, confidential, trade secret, business information. It will also afford protection to the Commission as well as parties who might review the information and subsequently be requested to reveal its contents inasmuch as the proposed order sets forth clear parameters for use of confidential information. Further, it will protect the confidential information of any other parties which might be provided during the course of these proceedings.

3. The entry of the proposed Protective Order will enable this Commission and other parties to adequately review the documentation which is provided pursuant to such Protective Order that it may have sufficient background upon which to enter its findings.

4. The proposed Protective Order is fair and equitable to all parties and provides the Commission with the opportunity to review information sought by the parties and at the same time allow for protection of the integrity of private property. The proposed Protective Order and Agreement to be executed thereunder will strike a reasonable balance between the desire for a fair production of documents and the protection of trade secret property as well as expedite the production of documents and other information to parties seeking to prepare for hearing.

5. The proposed Protective Order is substantially the same as the Orders entered by the Commission in prior cases.

THEREFORE, Veracity Communications requests that the Commission enter the Protective Order in the form attached hereto.

DATED this 14th day of July, 2005.

Veracity Communications, Inc.

Stanley K. Stoll  
Blackburn & Stoll, LC  
Attorneys for Petitioner

**CERTIFICATE OF MAILING**

I hereby certify that on this 14th day of July, 2005, I caused to be mailed a true and correct copy of the foregoing MOTION FOR PROTECTIVE ORDER in Docket No. \_\_\_\_\_ by first-class mail, postage prepaid to:

Michael Ginsberg  
Assistant Attorney General  
Division of Public Utilities

Paul Proctor  
Assistant Attorney General  
Committee of Consumer Services

Stanley K. Stoll