

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
CENTRAL DIVISION**

Verizon Wireless (VAW) LLC,  
CommNet Cellular License Holding, LLC,  
Missouri Valley Cellular, Inc.,  
Sanborn Cellular, Inc., and  
Eastern South Dakota Cellular, Inc.,  
d/b/a VERIZON WIRELESS,

Plaintiffs,

vs.

Bob Sahr, Gary Hanson, and Dustin  
Johnson, in their official capacities as  
the Commissioners of the South Dakota  
Public Utilities Commission,

Defendants,

South Dakota Telecommunications Ass'n  
and Venture Communications Cooperative,

Intervenors.

Civil Number 04-3014

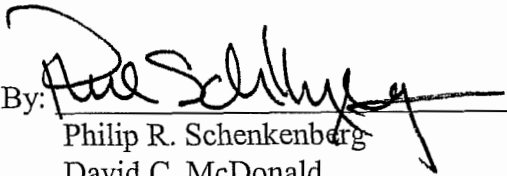
**PLAINTIFFS' NOTICE OF MOTION  
FOR PROTECTIVE ORDER**

RECEIVED  
OCT 31 2005  
SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

**PLEASE TAKE NOTICE** that Plaintiffs Verizon Wireless (VAW) LLC, CommNet Cellular License Holding, LLC, Missouri Valley Cellular, Inc., Sanborn Cellular, Inc., and Eastern South Dakota Cellular, Inc., d/b/a VERIZON WIRELESS (collectively, "Verizon Wireless") hereby moves the Court for a Protective Order, pursuant to Fed. R. Civ. P. 26(c)(7), that will allow Verizon Wireless to file under seal maps depicting Verizon Wireless' cell site locations in and around the State of South Dakota and the signal propagation of these cell site locations, which qualify as trade secrets under South Dakota law.

DATED this 28<sup>th</sup> day of October, 2005.

BRIGGS AND MORGAN, P.A.

By: 

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**Attorneys for Plaintiffs**

AFFIDAVIT OF SERVICE BY MAIL

STATE OF MINNESOTA

)

) ss.

Court File No. 04-3014

COUNTY OF HENNEPIN

)

Sandra J. Cambronne, being first duly sworn, deposes and states that on the 28<sup>th</sup> day of October, 2005, she served the attached PLAINTIFFS' NOTICE OF MOTION FOR PROTECTIVE ORDER upon:

Darla Pollman Rogers  
Ritter, Rogers, Wattier & Brown, LLP  
319 South Coteau Street  
P.O. Box 280  
Pierre, South Dakota 57501-0280

Rolayne Ailts Wiest  
South Dakota Public Utilities Commission  
500 East Capitol  
Pierre, South Dakota 57504-5070

(which is the last known address of said attorney) by depositing a true and correct copy thereof in the United States mail, postage prepaid.

Sandra J. Cambronne

Subscribed and sworn to before me this  
28<sup>th</sup> day of October, 2005.

Linda S. Dorn

Notary Public

