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ILLINOIS COMMERCE COMMISSION

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CHIEF CLERK'S OFFICE

In the Matter of)
)
MTI (USA) LLC)
)
Application for a Certificate of)
Prepaid Calling Card Service Provider)
Authority in Illinois Statewide)

Docket No. 140705

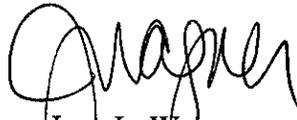
MOTION FOR PROTECTIVE ORDER

MTI (USA) LLC ("MTI"), by undersigned counsel, hereby files this Motion for Protective Order to prohibit any disclosure to the general public of any portion of MTI's financial statement submitted as Exhibit 6 to the above-referenced application. MTI requests that the Protective Order specifically state that these documents be disclosed only to Staff members directly involved in this case, and that any pleadings or other filings that incorporate, reference or attach the documents or any portion thereof be submitted under Seal.

MTI is a private, closely-held limited liability company whose financial information is maintained as highly confidential and proprietary. Public disclosure of this information would materially damage MTI's competitive and financial positions and will impair its ability to compete in the prepaid calling card service market, which will ultimately harm the public interest.

For the foregoing reasons, MTI (USA) LLC requests the entry of a Protective Order containing the terms and conditions set forth above, relative to its financial information, and for all other appropriate relief.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Wagner', written in a cursive style.

Jane L. Wagner
Counsel to MTI (USA) LLC
Marashlian & Donahue, LLC
The *Comm*Law Group
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McLean, VA 22102

Dated: November 24, 2014