

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION
BEFORE THE
ILLINOIS COMMERCE COMMISSION

ORIGINAL

Televergence Solutions, Inc.

Application for a Certificate of Interexchange
Authority to Operate as a Reseller of
Telecommunications Services Throughout
the State of Illinois

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Docket No. _____

15-0580

ILLINOIS COMMERCE
COMMISSION
2015 OCT 23 A 10:58
CHIEF CLERK'S OFFICE

MOTION FOR PROTECTIVE ORDER

Comes now, Televergence Solutions, Inc. ("Applicant" or "Televergence") and hereby files this Motion for Protective Order prohibiting any disclosure to the general public of any portion of the documents known as Televergence Solutions, Inc.'s Financial Information, labeled Confidential-Proprietary. Televergence requests that the Protective Order specifically state that these documents be disclosed only to Staff members directly involved with the Application for Authority, and that any pleadings or other filings that incorporate, reference or attach the documents or any portion thereof be submitted under Seal.

As grounds for this motion, Televergence states that its Financial Information contains information which is required to be submitted to the Commission as part of Televergence's Application for a Certificate of Interexchange Authority to Operate as a Reseller of Telecommunications Services. Televergence is, however, a private, closely-held corporation whose Financial Information is maintained as highly confidential and proprietary.

Public disclosure of this information would materially damage Televergence's competitive and financial positions. Further, the public interest would be impaired by public disclosure of the information contained in Televergence's Financial Information, in that any compromise of Televergence's competitive or financial positions, vis-a-vis its competitors, would ultimately work to the detriment of the consuming public.

For the foregoing reasons, Televergence Solutions, Inc. 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,

By: *Deborah L. Ward, CEO*
Deborah L. Ward, CEO
Televergence Solutions, Inc.
1221 S. Hartmann Drive, Suite E
Lebanon, TN 37090

Dated:

STATE of Tennessee §
 §
COUNTY of Wilson §

VERIFICATION

Deborah L. Ward, being first duly sworn on oath, deposes and states that she is CEO of Televergence Solutions, Inc., that she has read the above and foregoing Petition and knows the contents thereof, and that the same are true to the best of her knowledge, information and belief.

Deborah L. Ward, CEO
Deborah L. Ward, CEO
Televergence Solutions, Inc.

Subscribed and sworn to before me this 20~~th~~ day of July, 2015

Sheri A. Price
Notary Public
Exp - 6-26-17

