

IN THE SUPREME COURT OF FLORIDA

ATTORNEY GENERAL CHARLES J. CRIST
JR.,

Appellant,

SC Case No. SC04-9

v.

BRAULIO L. BAEZ, Chairman, and J. TERRY
DEASON, LILA A. JABER, RUDOLPH “RUDY”
BRADLEY, and CHARLES DAVIDSON,
Commissioners, as and constituting the FLORIDA
PUBLIC SERVICE COMMISSION, an agency of
the STATE OF FLORIDA, et al.,

Appellees.

**VERIZON FLORIDA INC.’S
MOTION FOR PROTECTIVE ORDER**

Appellee Verizon Florida Inc. (Verizon) asks this Court to issue a protective order maintaining the confidential treatment of certain of Verizon’s documents in the record in this case. These documents are designated as confidential in the Florida Public Service Commission’s document index. They are document numbers 08008-03, 08885-03, 09301-03, 09366-03, 09449-03, 09527-03, 10128-03, 10632-03, 10697-03, 10823-03, 11654-03, 11662-03, 11728-03, 11928-03, 11932-03, 12272-03 and 13137-03. Verizon understands that these documents will be transmitted to the

Court along with the rest of the record, but they will be in a sealed envelope marked “CONFIDENTIAL.”

The Florida Public Service Commission has issued orders granting confidential classification for all of these documents, which fall within Florida Statute § 364.183(3)(e), which defines the term “proprietary confidential business information,” to include “information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. These documents contain competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information would cause harm to Verizon by giving its competitors an unfair advantage in developing, pricing and marketing their services, among other things.

For these reasons, Verizon asks this Court to issue a protective order maintaining the continued confidential treatment of the information at issue.

Respectfully submitted on February 18, 2004.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via U.S. mail on February 18, 2004 to:

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