

BEFORE FEDERAL TRADE COMMISSION RECEIVED DOCUMENTS HOV 1 2001 SECRETARY a corporation DECCA MUSIC GROUP LIMITED, a Corporation,

FILE/DOCKET NO. 488016/0010231/DO9298

UNIVERSAL MUSIC & VIDEO DISTRIBUTION CORP., a corporation.

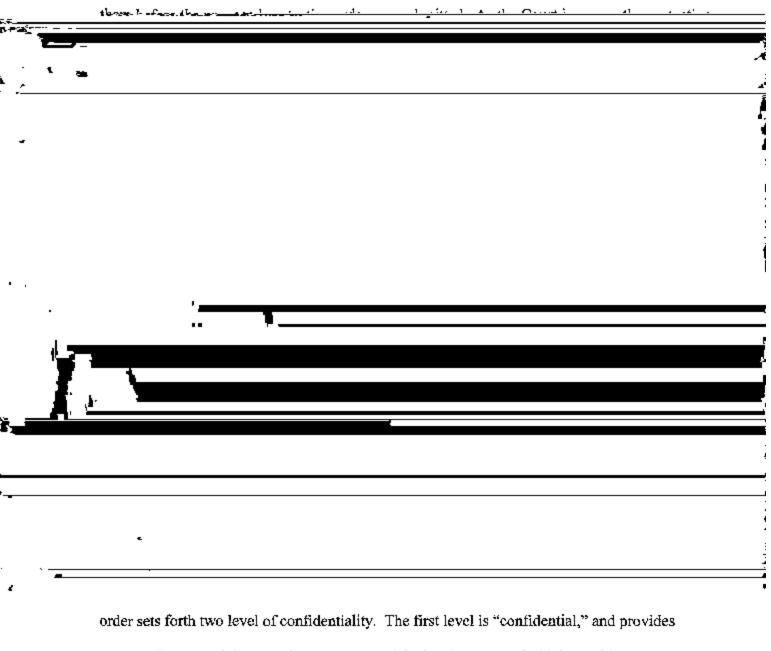
UMG RECORDINGS, INC.,

a corporation,

and

PESPONDENTS, SERBONSETO MARNED COMMINICATIONS INC. 8 MOLION

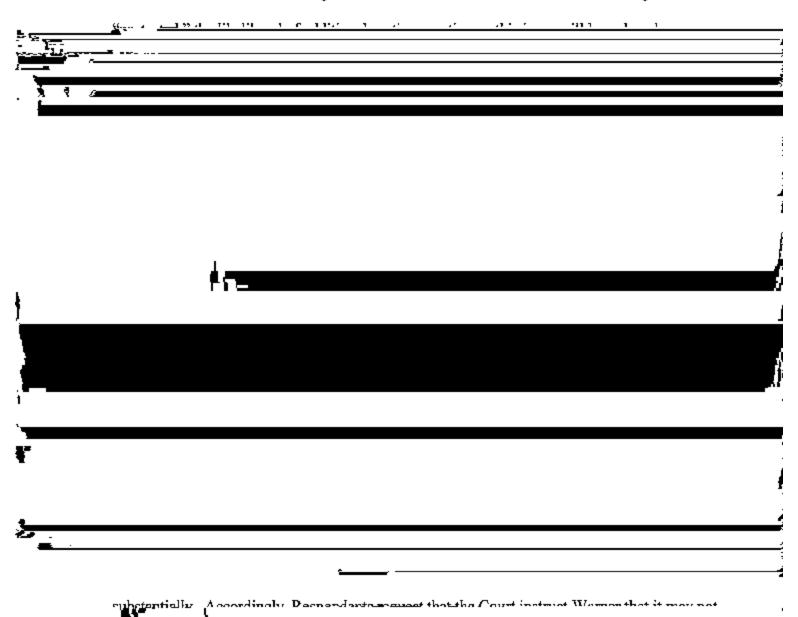
TO MODIFY PROTECTIVE ORDER GOVERNING DISCOVERY MATERIAL



order sets forth two level of confidentiality. The first level is "confidential," and provides "attorney's eyes only" protection to any materials the disclosure of which would cause substantial commercial harm or personal embarrassment to the producing party. The second level is designated "protected" and allows disclosure of otherwise "confidential" materials to

only serve to hinder Respondents' ability to defend this case -- requiring Respondents to seek permission to show important discovery materials to relevant employees, and to burden the Court with a motion every time such permission was denied. This concern is not merely theoretical, as Warner has already indicated that it is unwilling to reconsider whether its documents should be re-designated as "protected" unless requested to do so on document-by-document basis.

Respondents believe that, if Warner were to reassess its confidentiality designations to identify which documents should be designated as "confidential" and which should be designated as



CERTIFICATE OF SERVICE

I, Stephen E. Morrissey, hereby certify that on October 31, 2001, I caused a copy of the attached RESPONDENTS' MOTION FOR ENTRY OF PROTECTIVE ORDER to be

5 7 4		1 Paris 2 - 2-1 T 1 1 Day 1986 -
مرد ع برگ		
*		
-	J -	
	3	
<u>. 11 </u>	·	
_	· · · · · · · · · · · · · · · · · · ·	
	12 - 12 - 12 - 12 - 12 - 12 - 12 - 12 -	Donald C. Clark Sagratory
. 1	.	
<u></u>		
	<u></u>	
	_	
. <i>I</i>		
6		· ·
2-20-00	State of the state	
•		
,		