

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

T-PEG, INC and	)	
TIMBERPEG EAST, INC.,	)	
Plaintiffs,	)	
	)	
vs.	)	No. 03-CV-462-M
	)	
VERMONT TIMBER WORKS, INC.,	)	
And DOUGLAS FRIANT,	)	
Defendants.	)	

DEFENDANTS' MOTION TO SEAL  
REVENUE AND PROFIT INFORMATION [ASSENTED]

Defendants, Vermont Timber Works, Inc. ("VTW") and Doug Friant, move the Court, under Local Rule 83.11 to seal, at Level 1, the revenue and profit information in Page 10 of their Motion For Attorneys Fees and the related tax returns attached to Friant's Affidavit in the Motion For Attorneys Fees Appendix.

In support of this motion, defendants state:

1. The information is confidential and sensitive, both for personal reasons but also for competitive reasons within defendants' industry.
2. Level 1 protection is sufficient, since plaintiffs here already have access to the information and documents, which were produced in the case under protective order of this court.
3. Defendants request that the material remain sealed until the conclusion of the case and then returned or destroyed.
4. For the Court's convenience, defendants are filing the Motion For Attorneys Fees with the four sensitive figures on Page 10 redacted, with the full page in a sealed envelope, per Rule 83.11.

5. Defendants have conferred with plaintiffs' counsel, and plaintiffs assent to the relief requested.

6. No separate memo is submitted in support as the issue is straightforward and the requested relief is within the Court's discretion.

Date: April 14, 2005

VERMONT TIMBER WORKS, INC.  
and DOUGLAS FRIANT, Defendants,

By: W. E. Whittington  
Their Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2005, I served the foregoing pleading on the following counsel of record, by first class mail:

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