

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. EC-23, Sub 50

BLUE RIDGE ELECTRIC MEMBERSHIP
CORPORATION,

Complainant,

v.

CHARTER COMMUNICATIONS
PROPERTIES, LLC

Respondent.

**JOINT MOTION FOR ORDER
APPROVING STIPULATED
NONDISCLOSURE AND PROTECTIVE
AGREEMENT**

The above-referenced parties, by their undersigned counsel in the separate proceedings, hereby move the Commission for the entry of a stipulated Nondisclosure and Protective Agreement attached hereto as Exhibit A. In support of this request, the parties note the following:

1. By its Order Establishing Procedural Schedules dated June 7, 2017, in the above-referenced proceedings, the Commission has prescribed procedures by which the parties may conduct discovery.
2. The parties have issued discovery requests pursuant to this order, including requests that may call for the production of information regarded as confidential and proprietary by a party.
3. To facilitate the production of confidential materials, the parties jointly propose the issuance of an order adopting and requiring the parties' compliance with the Nondisclosure and Protective Agreement attached hereto as Exhibit A. The parties stipulate

that the attached Nondisclosure and Protective Agreement will protect the substantial interests of the parties and promote the efficient conduct of these proceedings.

WHEREFORE, the parties request that the Commission enter an order approving the attached Nondisclosure and Protective Agreement.

Respectfully submitted, this 8th day of August, 2017.

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CERTIFICATE OF SERVICE

The undersigned, of the law firm Brooks, Pierce, McLendon, Humphrey & Leonard, L.L.P., hereby certifies that he has served a copy of the foregoing **JOINT MOTION FOR ORDER APPROVING STIPULATED NONDISCLOSURE AND PROTECTIVE AGREEMENT** via electronic mail addressed to counsel of record in this proceeding.

This the 8th day of August, 2017.

Marcus W. Trathen
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