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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	98 Civ. 7076
)	
VISA U.S.A. INC.,)	MOTION FOR ENTRY OF
VISA INTERNATIONAL CORP.,AND)	STIPULATED PROTECTIVE
MASTERCARD INTERNATIONAL)	ORDER
INCORPORATED,)	
)	
Defendants.)	

Plaintiff, United States of America, respectfully moves this Court, pursuant to Fed. R. Civ. P. 26(c), for entry of the attached Stipulated Protective Order limiting the use and disposition of the information and documents produced in the course of discovery in this action. The discovery that is likely to be sought in this action includes requests for information of a highly sensitive and confidential nature, including requests for business, commercial, financial, and trade secret information of the defendants and non-parties to this action. As a result, the parties have jointly agreed to the attached Stipulated Protective Order, and request that the Court enter it in this case.

Defendants, Visa U.S.A. Inc., Visa International Corp., and MasterCard International Incorporated, have authorized the United States to move for entry of this Stipulated Protective Order which has been signed by counsel for all of the parties.

Respectfully submitted this 16th day of November, 1998.

/s/

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