STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
THE TOWERS, LLC APPLICATION FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A TELECOMMUNICATIONS FACILITY AND ASSOCIATED EQUIPMENT LOCATED AT 17 WARREN ROAD, WASHINGTON, CONNECTICUT	:	DOCKET NO. 543
	:	SEPTEMBER 9, 2025

MOTION FOR PROTECTIVE ORDER

The Towers LLC ("The Towers"), a joint venture between Vertical Bridge REIT, LLC ("VBR") and Cellco Partnership d/b/a Verizon Wireless ("Cellco") (collectively the "Applicant"), respectfully requests that the Connecticut Siting Council ("Council") issue a Protective Order pursuant to Connecticut General Statutes section 1-210(b)(5), with respect to certain terms of an Option and Lease Agreement (the "Agreement"), between Alfred H. Stevens and The Towers submitted to the Council in connection with the above-referenced proceeding.

Connecticut General Statutes section 16-50o provides, in relevant part:

> The applicant shall submit into the record the full text of the terms of any agreement . . . entered into by the applicant . . . in connection with the construction or operation of the facility. This provision shall ***not*** require the disclosure of proprietary information or trade secrets.

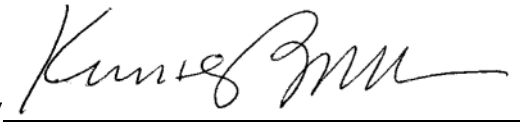
Conn. Gen. Stat. § 16-50o(c) (emphasis added). Pursuant to this requirement, The Towers submitted a redacted copy of the Agreement to the Council in the Docket No. 543 Application. (*See* Application, Attachment 16). The redacted provisions relate to financial terms and other confidential information contained in the Agreement ("Confidential Information"). The Towers is willing to submit an unredacted copy of the Agreement to the Council subject to the issuance

of a Protective Order that would limit disclosure of the Confidential Information to the Council and its staff.

As reflected in the attached Affidavit of Brian Paul, Project Manager, The Towers, LLC, the information for which The Towers seeks protected treatment is commercially valuable, confidential and proprietary, market-sensitive information that constitutes trade secrets within the meaning of Connecticut General Statutes §1-210(b)(5), and which Cellco has heretofore used its best efforts to maintain as secret in order to avoid the harm that would result if the Confidential Information were to become publicly available. The Council has historically granted protected treatment of similar filings.

WHEREFORE, Cellco respectfully request that the Council grant the request for protected treatment consistent with the attached Protective Order for the Agreement, which would limit disclosure of the Confidential Information to the Council and its staff.

Respectfully submitted,
THE TOWERS, LLC

By 

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
One State Street
Hartford, CT 06103
Its Attorneys

AFFIDAVIT

STATE OF CONNECTICUT)
) ss. ~~BRISTOL~~ Burlington
COUNTY OF HARTFORD)

BRIAN PAUL, being duly sworn, deposes and states that:

1. I am over the age of eighteen and understand the obligation of making a statement under oath.

2. I am a Project Manager for The Towers, LLC.

3. I am familiar with the terms of the Option and Lease Agreement, between Alfred H. Stevens and The Towers, LLC for the construction of a new wireless telecommunications facility on property at 17 Warren Road in Washington, Connecticut (the "Agreement").

4. A redacted copy of the Agreement was submitted to the Council as a part of the Docket No. 543 application.

5. The redacted provisions relate to the amount of rent and other monies to be paid by The Towers during the term of the Agreement and any extension thereof ("Confidential Information").

6. The Confidential Information is commercially valuable, confidential, proprietary, and market-sensitive information that constitutes trade secrets.

7. The Towers, LLC has heretofore used its best efforts to maintain the Confidential Information as secret in order to avoid the harm that would result if the information were to become publicly available.

Brian Paul
Project Manager
The Towers, LLC

Subscribed and sworn to before me
this 3 day of September, 2025

Commissioner of Superior Court/Notary Public

BEVELYN C ABJELINA
Notary Public, State of Connecticut
My Commission Expires May 31, 2030

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
THE TOWERS, LLC APPLICATION FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A TELECOMMUNICATIONS FACILITY AND ASSOCIATED EQUIPMENT LOCATED AT 17 WARREN ROAD, WASHINGTON, CONNECTICUT	:	DOCKET NO. 543
	:	SEPTEMBER 9, 2025

PROTECTIVE ORDER

WHEREAS, The Towers LLC ("The Towers"), a joint venture between Vertical Bridge REIT, LLC ("VBR") and Cellco Partnership d/b/a Verizon Wireless ("Cellco") (collectively the "Applicant"), is willing to submit an unredacted copy of an Option and Lease Agreement, between Alfred H. Stevens and The Towers (the "Agreement"), to the Council in connection with the above-captioned matter;

WHEREAS, The Towers considers the amount of rent and other monies to be paid by The Towers during the term of the Agreement to be confidential, market-sensitive and proprietary information that The Towers has prior to this point, used its best efforts to keep secret ("Confidential Information");

WHEREAS, The Towers has indicated its willingness to provide the Confidential Information to the Council subject to a Protective Order;

NOW, THEREFORE, it is hereby ordered, that the following procedure is adopted for the protection of the Confidential Information:

1. The Confidential Information shall be governed by the terms of this Order. This Order is applicable to all such Confidential Information, whether in the form of documents, data, testimony, studies or otherwise.

2. All Confidential Information shall be subject to this Order and shall be given solely to the Council and its staff. It is understood and agreed that said information is confidential, market-sensitive and proprietary in nature and shall in no event be disclosed to any other person, entity, corporation or association, and shall neither be used nor discussed except for the purposes of this proceeding. All persons in receipt of any Confidential Information pursuant to this Order shall maintain a written log of all individuals granted access to the Confidential Information.

3. Confidential Information shall be marked as such and delivered in a sealed envelope to the Council.

4. All recipients shall be bound by the terms of this Order.

5. In the event that the Confidential Information is to be used in any manner in any proceeding or hearing before the Council, such proceeding or hearing shall not be held before, nor any record of it made available, to any other party, intervenor, or other person or entity. Presence at such proceeding or hearing shall be limited to the Council, its staff and representatives of The Towers. No record shall be disclosed, or communication made of the information at any time to any person or entity. Any transcript or other recording of the Confidential Information shall be placed in sealed envelopes or containers and a statement in the following form placed on such envelope or container:

CONFIDENTIAL INFORMATION

This envelope is not to be opened nor the contents thereof to be displayed or revealed except pursuant to the Protective Order issued in Docket No. 543.

6. No copies shall be made of the Confidential Information unless expressly ordered by the Council.

7. Nothing herein shall be construed as a final determination that any of the Confidential Information will be admissible as substantive evidence in this proceeding or at any hearing or trial. Moreover, nothing herein shall be considered a waiver of any party's right to assert at a later date that the material is or is not proprietary or privileged. A party seeking to change the terms of the Order shall by motion give every other party five (5) business days' prior written notice. No information protected by the Order shall be made public until the Council rules on any such motion to change the terms of the Order. Confidential Information otherwise properly discovered, even though also subject to the terms of the Order, shall not be considered protected by the Order.

8. No Recipient shall use or disclose the Confidential Information for purposes of business or competition, or for any other purpose, other than the purpose of preparation for and conduct of this proceeding, and then solely as contemplated herein, and shall in good faith take all reasonable precautions to keep the Confidential Information secure in accordance with the purposes and intent of this Order.

9. All copies of such Confidential Information shall be returned to the Applicant no later than thirty (30) days after the expiration of all appeal periods applicable to the final decision rendered in this proceeding.

CONNECTICUT SITING COUNCIL

By: _____

Dated: _____, 2025