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May 30, 2018

***By ECFS***

Michelle M. Carey  
Chief, Media Bureau  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

**Re: Declaration of Confidentiality, beIN Sports, LLC, Complainant,  
v. Comcast Cable Communications, LLC and Comcast Corporation, Defendants,  
MB Docket No. 18-90**

Dear Ms. Carey:

On behalf of beIN Sports, LLC ("beIN"), enclosed is an executed copy of the Declaration of Confidentiality required by the Media Bureau's Protective Order (DA 18-487) for access to Highly Confidential Information filed in the above-referenced docket. The executor of the enclosed Declaration is an outside consultant for beIN who is seeking access to Highly Confidential Information for the purpose of assisting Outside Counsel of Record in this proceeding.

Sincerely,



Georgios Leris  
*Counsel to beIN Sports, LLC*

Enclosures

## **CERTIFICATE OF SERVICE**

I, Georgios Leris, hereby certify that on May 30, 2018, I caused true and correct copies of the foregoing to be served by electronic mail upon the following:

Michael D. Hurwitz  
Willkie Farr & Gallagher LLP  
1875 K Street, NW  
Washington, DC 20006

Sincerely,

/s/  
Georgios Leris  
Step toe & Johnson LLP

**ATTACHMENT A**

**DECLARATION**

I, Wilson Merrell, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Commission in this proceeding, and I understand it. I agree to be bound by its terms pertaining to the treatment of Highly Confidential Information submitted by parties to this proceeding and that I shall not disclose or use Stamped Highly Confidential Documents or Highly Confidential Information except as allowed by the Protective Order.

Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or public interest organization), I acknowledge specifically that my access to any Highly Confidential Information obtained as a result of the Protective Order is due solely to my capacity as (1) Outside Counsel of Record or (2) other person described in paragraph 4 of the foregoing Protective Order, and that I will not use such Highly Confidential Information in any other capacity; nor will I disclose such Highly Confidential Information except as specifically provided in the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Stamped Highly Confidential Documents and Highly Confidential Information are used only as provided in the Protective Order; and (2) Stamped Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Protective Order, and I certify that I have verified that there are in place procedures, at my firm or office, to prevent unauthorized disclosure of Stamped Highly Confidential Documents or Highly Confidential Information.

I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement between the undersigned and the Submitting Party.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

(signed)



(printed name)

Wilson Merrell

(title)

Research Analyst

(employer)

Brattle Group