

**Stevie F. Rushing**

Associate  
srushing@bradley.com  
601.592.9938 direct



January 26, 2023

**Via Electronic Mail:**

Stephanie R. Jones  
Deputy General Counsel  
University of Mississippi Medical Center  
2500 North State Street  
Jackson, MS 39216-4505

[srjones@umc.edu](mailto:srjones@umc.edu)

Marc Rolph  
Executive Director  
Office of Communications and Marketing  
University of Mississippi Medical Center

[publicrecords@umc.edu](mailto:publicrecords@umc.edu)

**Via Hand Delivery:**

Voice Products, Inc.  
c/o its registered agent, Registered Agents, Inc.  
270 Trace Colony Park, Suite B  
Ridgeland, MS 39157

Re: Notice of and Reasons for Filing Petition for Protective Order

All:

On January 12, 2023, Nuance Communications, Inc. (“Nuance”) received notice that Voice Products, Inc. (“Voice Products”) submitted a public records request to the University of Mississippi Medical Center (“UMMC”), seeking “[a]ll bid documents submitted by vendors on RFP1290, due date 8/16/22 [or,] [i]f all bids are not available, [a] copy of the bid that was awarded the contract [] [].”

Nuance hereby gives notice to UMMC and Voice Products that Nuance intends to seek a protective order from the Chancery Court of Hinds County, Mississippi to prevent the public release of Nuance’s unredacted proposal to Request for Proposals No. 1290 (“the RFP”). *See* Miss. Code § 25-61-9(7).<sup>1</sup>

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<sup>1</sup> Nuance provides this pre-petition notice out of an abundance of caution. In doing so, Nuance does not concede that its response to the RFP constitutes a “procurement contract” for purposes of the Mississippi Public Records Act.

Nuance desires a protective order because its proposal contains Nuance's trade secrets and/or confidential commercial or financial information. Examples of this information include, but are not limited to, the following:

- confidential and proprietary financial information, including budgets, costs, and expenses;
- confidential information regarding key personnel;
- confidential information regarding current and past clients, including services provided to the same;
- confidential information regarding corporate ownership and structure;
- confidential information regarding trade secrets and proprietary technologies and processes; and
- confidential and proprietary strategies for pricing, staffing, marketing, management, and cost-containment.

This information is exempt from the Mississippi Public Records Act's presumption of accessibility. *See* Miss. Code §§ 25-61-9(1), 79-23-1. Accordingly, the foregoing information and any similar information should not be publicly disclosed. Unless Voice Products withdraws or modifies its request, Nuance will file its petition for a protective order in the Chancery Court of Hinds County, Mississippi on or before February 2, 2023.

**I request UMMC immediately publish this notice on the Mississippi procurement portal in accordance with Mississippi Code § 25-61-9(7).** Further, I request that any questions regarding this notice or the petition be directed to me.

Best regards,

/s/ Stevie F. Rushing

Stevie F. Rushing (MS Bar #105534)  
BRADLEY ARANT BOULT CUMMINGS LLP  
188 East Capitol Street, Suite 1000  
Post Office Box 1789  
Jackson, MS 39215-1789  
Telephone: (601) 948-8000  
Facsimile: (601) 948-3000  
[srushing@bradley.com](mailto:srushing@bradley.com)

*Attorney for Nuance Communications, Inc.*