UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Dow Jones & Company, Inc. **Plaintiff,** **v.** **Albaise Ltd. and General Inventors Institute A, Inc.** **Defendants.**	**CASE NUMBER 06-1014 (JR)**
Dow Jones Reuters Business Interactive, LLC, d/b/a Factiva, **Plaintiff,** **v.** **Albaise Ltd. and General Inventors Institute A, Inc.** **Defendants.**	**CASE NUMBER 06-1015 (JR)**

DEFENDANTS' JOINT UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE THEIR MARKMAN BRIEF

The above-captioned actions are related matters assigned to this Court. In both cases, the plaintiffs, Dow Jones & Company, Inc. ("Dow Jones") and Dow Jones Reuters Business Interactive, LLC, d/b/a Factiva ("Factiva") seek declaratory judgments that U.S. Patent No. 6,961,737 is not infringed and is invalid. Dow Jones in case number 06-1014 further seeks a declaratory judgment that U.S. Patent No. 6,295,530 is not infringed and is invalid.

Pursuant to Scheduling Orders issued in both cases, the Markman briefs of Dow Jones and Factiva are both due on December 22, 2006. The Defendants' response briefs are due on March 21, 2007; reply briefs on April 11, 2007; sur-reply briefs on April 25, 2007 and a Markman hearing is set for May 3, 2007 at 10:00 a.m.. For the reasons described below, Dow

Jones and Factiva now respectfully request that the Court extend the deadline for the filing of their Markman briefs by two weeks, to January 5, 2007. That extension will permit Dow Jones and Factiva to file a single, joint Markman Brief, which will render the claim construction proceedings more efficient and cost-effective for both the parties and the Court.

At the time these suits were filed, and at all times up to last Friday, December 15, 2006, Dow Jones and Factiva, although related parties, were under separate ownership. Factiva was limited liability corporation that was a joint venture between Dow Jones and Reuters Group PLC ("Reuters"). As a consequence, although the parties cooperated in connection with these actions, they necessarily conducted the litigation separately. On December 15, 2006, however, Dow Jones acquired from Reuters its interest in Factiva, making Factiva a wholly-owned subsidiary of Dow Jones. Now that Dow Jones and Factiva are under common ownership, the parties are able to coordinate fully their efforts in these actions.

Dow Jones and Factiva seek this extension to file their Markman brief in order to be able to prepare and file a single Markman brief. This coordination will eliminate a separate set of briefs for both parties, thereby saving them and the Court time and effort. Plaintiffs expect that this will help streamline the litigation. Thus, Dow Jones and Factiva respectfully request that the Court grant this joint motion to extend the deadlines in the scheduling order by two weeks. Counsel for Dow Jones has consulted with counsel for Defendants in both actions, who has advised that Defendants do not oppose this request.

A proposed order is attached.

Respectfully submitted,

Dated: December 18, 2006

/s/ Steven Lieberman

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Dated: December 18, 2006

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PROOF OF SERVICE

On the date below, I sent by First Class Mail, Facsimile, and Electronic Mail a true copy of **DEFENDANTS' JOINT MOTION TO EXTEND DEADLINE TO FILE THEIR MARKMAN BRIEF** to:

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I declare that the statements above are true to the best of my information, knowledge, and belief.

Date: December 18, 2006

Signature: /s/ Nasri Hage
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