IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DOW JONES & COMPANY, INC.
200 Liberty Street
New York, New York 10281,

Plaintiff,

v.

ABLAISE LTD. ("Ablaise")
40 Queen Anne Street
London W1G 9EL
United Kingdom

and

GENERAL INVENTIONS
INSTITUTE A, INC., ("GIIA")
Craigmuir Chambers
P.O. Box 71
Town Road
Tortola, British Virgin Islands,

Defendants.

Civil Action No. 1:06CV01014

Judge James Robertson

ORAL HEARING REQUESTED

DOW JONES REUTERS
BUSINESS INTERACTIVE, LLC
200 Library Street
New York, New York 10281,

Plaintiff,

v.

ABLAISE and GIIA,

Defendants.

Civil Action No. 1:06CV01015

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Declaration of Anthony Alan Dearsley

I, Anthony Alan Dearsley, declare as follows:

1. My name is Anthony Alan Dearsley. I work at Kroll Ontrack in the U.K. My position is

Head of Computer Forensics (UK).

2. Kroll Ontrack is a worldwide leader in data recovery services. Kroll Ontrack is often used to assist in litigation-related services, including document recovery, restoration, preservation, and production issues. Kroll Ontrack has proprietary and industry standard professional equipment and expert, professional computer forensic engineers.

3. Ablaise retained Kroll Ontrack as a consultant on two occasions. The first consultation occurred in the autumn of 2007. This was an informal consultation. The second consultation commenced on November 28, 2007. Ablaise retained Kroll Ontrack to physically review media at Andrew Ritchie's house, opine as to whether the media needed to be restored or recovered, and, if so, what the cost would be for restoration or recovery.

4. George Crick is a consultant at Kroll Ontrack. He physically reviewed the following media at Andrew M. Ritchie's house: 160 back-up tapes, three laptops, five hard drives, two tower computers, and two CDs. The back-up tapes are comprised of the following: 121 DLT4 tapes, 38 DAT tapes, and 1 SDLT tape. All of these back-up tapes are disaster recovery back-up tapes. The tapes are not marked externally with any dates.

5. In order to access the data on disaster recovery back-up tapes, the data must be extracted from the tapes. This extraction process requires professional skill, expertise, and equipment. Kroll has the expertise and equipment needed to extract data from disaster recovery back-up tapes. Kroll Ontrack charges £600 per tape for data extraction. The cost for all 160 back-up tapes would be £96,000. In order to extract the data from all 160 back-up tapes would be approximately 20-22 business days.

6. Mr. Ritchie also has twelve total hard drives. Mr. Ritchie represented that all of these

hard drives are at least ten years old and have not been used for quite some time. Kroll Ontrack recommends that these hard drives should be forensically imaged in order to protect and preserve the data. Accessing or using these hard drives without a professional, forensic image creates a significant risk that the data on the hard drives would be damaged or lost. Specifically, old hard drives and computers that have not been used for years that are suddenly given power and accessed are at significant risk of losing or damaging the data on the hard drives. Due to the all age of this media, Kroll advises that all of these hard drives be professionally, forensically imaged for accuracy and preservation.

7. Taking a forensic image of a hard drive is a complex and labor intensive process that requires professional skill, expertise, and equipment, including industry standard hardware and software.

8. The cost of a forensic image is £450 per hard drive. This forensic image would enable the process and extraction of any "active data" from the hard drive. It would not recover any "deleted data" from the hard drive. To forensically image all twelve hard drives would cost £5400. Kroll Ontrack estimates that it would take approximately 6-8 business days to image all twelve hard drives.

9. In order to recover "deleted data" from a hard drive it would require a more detailed process and extraction. This would cost £1,250 per hard drive. To recover the deleted data from all twelve hard drives would cost £15,000. Kroll Ontrack estimates that this process would take 8-10 business days.

10. With regard to all the services that I described herein, Kroll Ontrack cannot guarantee that the data extraction or forensic image will be successful. Old media can be

particularly susceptible to physical damage. The only way to determine if the data can be successfully extracted or forensically imaged is to make an attempt.

I declare under the penalty of perjury and the laws of the District of Columbia that the foregoing is true and correct to the best of my knowledge.

Dated this 10th day of December 2007

Anthony Alan Dearsley