UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DOW JONES & COMPANY, INC. Plaintiff, v. ABLAISE LTD and GENERAL INVENTIONS INSTITUTE A, INC., Defendants.	**Civil Action No. 1:06CV01014 JR**
DOW JONES REUTERS BUSINESS INTERACTIVE, LLC Plaintiff, v. ABLAISE LTD and GENERAL INVENTIONS INSTITUTE A, INC., Defendants.	**Civil Action No. 1:06CV01015 JR**

PLAINTIFFS' MOTION TO FILE REPLY MEMORANDUM AND DECLARATION UNDER SEAL

Plaintiffs, Dow Jones & Company, Inc. and Dow Jones Reuters Business Interactive, LLC (collectively, "Dow Jones"), by their attorneys, pursuant to LCvR 5.1(j) and LCvR 7, hereby move the Court to seal (1) Plaintiffs' Reply Memorandum in Support of Plaintiffs' Motion to Compel Discovery ("Memorandum") and (2) the Declaration of Oliver Edwards ("Declaration"), both of even date and accompanying this motion. As grounds for this motion, Dow Jones states the following:

1. Pursuant to the Protective Order entered by this Court November 27, 2007 (doc. no. 41, case 06-01014), the parties may designate materials as Confidential Information. Materials which may be designated as Confidential Information include "agreements or relationships with third parties." Protective Order at ¶ 2. The Memorandum and Declaration identified above disclose information produced by Ablaise pertaining to agreements or

relationships with third parties that has been designated by Ablaise as "Confidential Information" under the Protective Order.

2. The Protective Order governs all pleadings and nondispositive motions and applies to filings required pursuant to the Local Rules of this Court. Protective Order at ¶ 8.

3. If a party files a document containing or disclosing Confidential Information with the Court, it shall file that document under seal and in compliance with LCvR 5.1(j).

4. If the Court denies this motion, Dow Jones respectfully requests that Dow Jones be permitted to (1) file the Memorandum and Declaration with the material designated Confidential Information redacted; and (2) have the benefit of the timely filing date for the redacted Memorandum and Declaration even with the filing date of the unredacted Memorandum and Declaration.

5. In accordance with Local Rule 7(m), counsel for Dow Jones contacted counsel for Defendants regarding this motion. Counsel for Defendants indicated that they would not oppose this motion.

WHEREFORE, Dow Jones requests that this Court order the Memorandum and Declaration sealed.

Date: December 20, 2007

Respectfully submitted,

By: _____

Steven Lieberman (439783)
Joseph A. Hynds (440464)
Brian Rosenbloom (461413)
ROTHWELL, FIGG, ERNST & MANBECK
1425 K Street, NW
Suite 800
Washington, DC 20005
Tel: (202) 783-6040
Fax: (202) 783-6031

Attorneys for Plaintiffs
Dow Jones & Company, Inc. and
Dow Jones Reuters Business Interactive, LLC

CERTIFICATE OF SERVICE

I hereby certify, that on this 20th day of December, 2007, I electronically filed with the Clerk of the Court, **PLAINTIFFS' MOTION TO FILE REPLY MEMORANDUM AND DECLARATION UNDER SEAL** using the CM/ECF system and have served all parties in the manner described below to the following:

Amy S. Owen (Electronic Notification and U.S. First Class Mail)
COCHRAN & OWEN, LLC
8000 Towers Crescent Drive, Suite 160
Vienna, VA 22182
703-847-4480

Eric S. Jackson (Electronic Notification and and U.S. First Class Mail)
ROBINS, KAPLAN, MILLER & CIRESI LLP
1875 Eye Street, NW
Suite 300
Washington, DC 20006-5409
(202) 775-0725

Patrick M. Arenz (Electronic Notification and and U.S. First Class Mail)
Cyrus A. Morton
ROBINS, KAPLAN, MILLER & CIRESI LLP
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402-2015
(612) 349-8500

__/s/_____
Brian S. Rosenbloom