IN THE 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. 1:06-CV-01014 Judge James Robertson
Dow Jones Reuters Business Interactive, LLC d/b/a Factiva, Plaintiff. v. Ablaise Ltd. and General Inventions Institute A, Inc. Defendants	Civil Action No. 1:06-CV-01015 Judge James Robertson

DEFENDANT'S MOTION TO FILE MOTION TO COMPEL AND DECLARATION UNDER SEAL

Defendants, Ablaise Ltd. and GIIA, by counsel, respectfully request that the Court seal their motion to compel discovery and corresponding declaration of Patrick M. Arenz. The motion to compel contains material designated by the Plaintiffs as "Confidential" under the Protective Order, entered by this Court on November 27, 2007. The Protective Order requires documents to be filed under seal that contain Confidential information. Consistent with the Protective Order and the Local Rules of this Court, Defendants file this motion to request leave to file their discovery motion and declaration under seal. Plaintiffs do not oppose this request.

DATED: March 19, 2008

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

By: /s/
Ronald J. Schutz
Jake H. Holdreith
Eric S. Jackson #446657
Cyrus A. Morton
Patrick M. Arenz

2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402-2015
Ph: (612) 349-8500
Fx: (612) 339-4181

AND

By: /s/
Amy S. Owen #411601
aowen@cochranowen.com
Ben Selan #495232
bselan@cochranowen.com
COCHRAN & OWEN, LLC
8000 Towers Crescent Drive, Suite 160
Vienna, VA 22182
Ph: (703) 847-4480
Fx: (703) 847-4499

ATTORNEYS FOR ABLAISE LTD. AND GENERAL INVENTIONS INSTITUTE A, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Defendants Motion to File Motion to Compel and Declaration Under Seal was electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following on this 19th day of March, 2008, unless otherwise noted:

Steven Lieberman
slieberman@rothwellfigg.com
Rothwell, Figg, Ernst & Manbeck
1425 K Street NW, Suite 800
Washington, D.C. 20005
Ph: (202) 783-6040
Fx: (202) 783-6031

Counsel for Plaintiff

/s/
Amy S. Owen #411601
aowen@cochranowen.com
Ben Selan #495232
bselan@cochranowen.com
COCHRAN & OWEN, LLC
8000 Towers Crescent Drive, Suite 160
Vienna, VA 22182
Ph: (703) 847-4480
Fx: (703) 847-4499
Counsel for Defendants