**IN THE UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF COLUMBIA**

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

**DEFENDANT'S MOTION TO FILE REPLY AND RESPONSE BRIEFS AND DECLARATIONS UNDER SEAL**

Defendants, Ablaise Ltd. and GIIA, respectfully request that the Court seal their reply brief for their motion to compel discovery and corresponding declaration of Diane L. Simerson, and their response brief to Dow Jones' motion to compel discovery and corresponding declaration of Patrick M. Arenz. The motion papers for both briefs contain 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: April 16, 2008

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

By: /s/
Ronald J. Schutz
Jake M. Holdreith
Cyrus A. Morton
Patrick M. Arenz

2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402-2015
612-349-8500

**COCHRAN & OWEN LLC**

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 DEFENDANTS ABLAISE LTD. AND GENERAL INVENTORS INSTITUTE A, INC.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Defendants' Motion to File Reply and Response Briefs and Declarations Under Seal was electronically filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following on this 16th day of April, 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 Ablaise LTD. and General Inventors Institute A, Inc.