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

DEFENDANTS' MOTION TO FILE OPPOSITION MEMORANDUM AND DECLARATION TO PLAINTIFFS' MOTION TO COMPEL UNDER SEAL

Defendants, Ablaise Ltd. and GIIA, respectfully request that the Court seal their opposition memorandum and corresponding declaration of Patrick M. Arenz to Plaintiffs' Motion to Compel Documents. The motion papers contain material designated by the Defendants 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 opposition memorandum and declaration under seal. Plaintiffs do not oppose this request.

DATED: June 17, 2008

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

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

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

COCHRAN & OWEN LLC

By: s/ Ben Selan
Amy Owen #411601
Ben Selan #495232

8000 Towers Crescent Drive, Suite 160
Vienna, VA 22182
703-847-4480

ATTORNEYS FOR DEFENDANTS ABLAISE LTD. AND GENERAL INVENTORS INSTITUTE A, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing Defendants' Motion to File Opposition Memorandum and Declaration to Plaintiffs' Motion to Compel Under Seal and [Proposed] Order were 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 17th day of June, 2008, unless otherwise noted:

s/ Patrick M. Arenz
Patrick M. Arenz
pmarenz@rkmc.com
ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402
Ph: (612) 349-8500
Fx: (612) 339-4181
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of June, 2008, I have caused to be served true and correct copies of the following documents:

- DEFENDANTS' MOTION TO FILE OPPOSITION MEMORANDUM AND DECLARATION TO PLAINTIFFS' MOTION TO COMPEL UNDER SEAL; AND
- [PROPOSED] ORDER

on the following in the manner indicated below:

Oliver L. Edwards, Esq. Rothwell, Figg, Ernst & Manbeck, P.C. 1425 K Street NW, Suite 800 Washington, DC 20005	*Attorney for Plaintiffs* Dow Jones (via U.S. mail)

s/ Patrick M. Arenz
Patrick M. Arenz