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

MOTION FOR LEAVE TO FILE REPLY MEMORANDUM OF PLAINTIFF DOW JONES IN SUPPORT OF ITS MOTION TO COMPEL PRODUCTION OF DOCUMENTS UNDER SEAL

Plaintiffs, Dow Jones & Company, Inc. and Dow Jones Reuters Business Interactive, LLC d/b/a Factiva (collectively, "Dow Jones"), by their attorneys, pursuant to LCvR 5.1(j) and LCvR 7, hereby move the Court to seal the Reply Memorandum of Plaintiff Dow Jones in

Support of its Motion to Compel Production of Documents 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 (06-1014 doc. no. 41), the parties may designate disclosed or produced materials as Confidential Information. The Reply Memorandum identified above discloses information 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. 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 Reply Memorandum sealed.

Date: June 30, 2008

Respectfully submitted,

By: /s/_____

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[PROPOSED] ORDER SEALING OPPOSITION AND DECLARATION

Upon consideration of Dow Jones' Motion for Leave to File its Reply Memorandum in Support of its Motion to Compel Production of Documents Under Seal, it is on this ____ day of June, 2008 hereby

ORDERED that the Motion is **GRANTED** and the Reply Memorandum of Plaintiff Dow Jones in Support of its Motion to Compel Production of Documents is hereby sealed.

James Robertson
United States District Court Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **MOTION FOR LEAVE TO FILE REPLY MEMORANDUM OF PLAINTIFF DOW JONES IN SUPPORT OF ITS MOTION TO COMPEL PRODUCTION OF DOCUMENTS UNDER SEAL and PROPOSED ORDER** was electronically filed this 30th day of June, 2008. Notices of filing will be sent to all parties by operation of the court's electronic filing system. Parties may access this filing through the Court's System.

S/
Sharon L. Davis (439223)