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 FOR LEAVE TO FILE OPPOSITION OUT OF TIME

In an abundance of caution, Defendants, Ablaise and GIIA, respectfully request that the Court grant Defendants leave to file their opposition to Plaintiffs' motion to compel out of time. This motion is a result of a convoluted history relating to Plaintiffs' motion to compel. Plaintiffs originally filed their motion to compel on August 12, 2008. Based on that date, Defendants sought an extension until September 2, 2008 to respond, which was granted. Plaintiffs, however, re-filed the motion under seal, which was formally filed on August 25, 2008, when the Court accepted it. The extension was granted on the same day the Court accepted Plaintiffs' motion under seal. Under the Local Rules, therefore, Defendants had eleven days to oppose Plaintiffs' motion and an additional three days due to the manner of

service by Dow Jones. Based on the August 25 filing date, Defendants' opposition is due on September 8, 2008.

Because the hearing on this motion will be heard on September 12, 2008, Defendants sought to file its opposition by the original September 2, 2008 date. But Defendants reached the Courthouse just after 4 pm Eastern time and were unable to file their opposition, which had to be filed under seal, on September 2. Defendants delivered the opposition to the Clerk of Court this morning, September 3. The opposition, nevertheless was served on Plaintiffs yesterday, on September 2. The Plaintiffs will not be prejudiced by this motion, and they have consented to the motion.

Defendants respectfully request that the Court accept their opposition if the Court determines it to be late.

DATED: September 3, 2008

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing DEFENDANTS' MOTION FOR LEAVE TO FILE OPPOSITION OUT OF TIME 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 3rd day of September, 2008, unless otherwise noted:

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