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 PLAINTIFF DOW JONES' REPLY MEMORANDUM IN SUPPORT OF THEIR 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 (1) Reply Memorandum of Plaintiff Dow Jones in Support of its Motion To Compel Production of Documents ("Reply") and (2) the Declaration of

David B. Orange, Esq. ("Declaration"), both 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 and Declaration identified above disclose 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 and Declaration sealed.

Date: September 9, 2008

Respectfully submitted,

By: /s/

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Attorneys for Plaintiffs, Dow Jones & Company, Inc. and Dow Jones Reuters Business Interactive, LLC d/b/a Factiva

CERTIFICATE OF SERVICE

I hereby certify, that on this 9th day of September, 2008, I electronically filed with the Clerk of the Court, **MOTION FOR LEAVE TO FILE PLAINTIFF DOW JONES' REPLY MEMORANDUM IN SUPPORT OF THEIR MOTION TO COMPEL PRODUCTION OF DOCUMENTS UNDER SEAL** using the CM/ECF system and have served all parties in the manner described below to the following:

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__/s/_____
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