IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THE DOW CHEMICAL COMPANY, Plaintiff, v. NOVA CHEMICALS CORPORATION (CANADA), and NOVA CHEMICALS INC. (DELAWARE), Defendants.	)	C.A. No. 05-737 (JJF) **JURY TRIAL DEMANDED**

DEFENDANTS' MOTION TO COMPEL
PRODUCTION OF WITHHELD DOCUMENT

Defendants NOVA Chemicals Corporation and NOVA Chemicals Inc. ("NOVA") respectfully move this Court for an Order compelling Plaintiff The Dow Chemical Company ("Dow") to produce a document improperly withheld as a work product or privileged attorney-client communication. The grounds for this motion are set forth in Defendants' Opening Brief in Support of Motion to Compel Production of Withheld Document, filed contemporaneously herewith.

D. DEL. LOCAL RULE 7.1.1 CERTIFICATE

Counsel for NOVA and counsel for Dow conferred regarding the above motion. No agreement was reached, therefore, it is presented to the Court for ruling.

Respectfully submitted,

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Dated: August 11, 2008
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CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on August 11, 2008, the attached document was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading.

I hereby certify that on August 11, 2008, the attached document was Electronically Mailed to the following person(s):

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