

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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JONES DAY,)	
)	
	Plaintiff,)	
)	
v.)	Civil Action No. 06 CV 0466 (JR)
)	
RICHARD M. SCRUSHY,)	
)	
	Defendant.)	
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**CONSENT MOTION OF PLAINTIFF JONES DAY TO SEAL ITS OPPOSITION
TO MOTION TO TRANSFER**

Plaintiff Jones Day, through undersigned counsel, respectfully submits this motion to file its opposition to the motion to transfer filed by Defendant Richard M. Scrushy (“Scrushy”) under seal pursuant to Rule 5.1(j) of the United States District Court for the District of Columbia. Counsel for Scrushy has consented to this motion. As set forth in its memorandum of points and authorities in support of this motion, Jones Day recognizes that it has a responsibility to maintain the confidentiality of information obtained during or related to its representation of Scrushy. Mindful of this responsibility, Jones Day requests that the Court grant this motion and allow it to file its opposition brief and supporting declaration and exhibits under seal..

Dated: June 8, 2006

Respectfully submitted,

/s/

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