

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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**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF  
JONES DAY'S CONSENT MOTION TO SEAL ITS OPPOSITION  
TO MOTION TO TRANSFER**

Plaintiff Jones Day, through undersigned counsel, respectfully submits this memorandum of points and authorities in support of its 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 the motion.

Scrushy retained Jones Day to represent him in various matters during 2003. While that representation has been terminated, Jones Day still has a responsibility to safeguard the confidentiality of information that it received during that representation, including information that is protected by the attorney-client privilege. See District of Columbia Rule of Professional Conduct ("D.C. Rule") 1.6 cmt. 28.

