

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

<hr/>)	
Dow Jones & Company, Inc.)	
)	
Plaintiff,)	
)	
v.)	CASE NUMBER 06-1014 (JR)
)	
Albaise Ltd. and General Inventors)	
Institute A, Inc.)	
)	
Defendants.)	
<hr/>)	
)	
Dow Jones Reuters Business Interactive,)	
LLC, d/b/a Factiva,)	
)	
Plaintiff,)	CASE NUMBER 06-1015 (JR)
)	
v.)	
)	
Albaise Ltd. and General Inventors)	
Institute A, Inc.)	
)	
Defendants.)	
<hr/>)	

**JOINT UNOPPOSED MOTION TO EXTEND DEADLINE
TO FILE THEIR MARKMAN BRIEF**

The above-captioned actions are related matters assigned to this Court. In both cases, the plaintiffs, Dow Jones & Company, Inc. ("Dow Jones") and Dow Jones Reuters Business Interactive, LLC, d/b/a Factiva ("Factiva") seek declaratory judgments that U.S. Patent No. 6,961,737 is not infringed and is invalid. Dow Jones in case number 06-1014 further seeks a declaratory judgment that U.S. Patent No. 6,295,530 is not infringed and is invalid.

Pursuant to Scheduling Orders issued in both cases, the Markman briefs of Dow Jones and Factiva are both due on December 22, 2006. The Defendants' response briefs are due on March 21, 2007; reply briefs on April 11, 2007; sur-reply briefs on April 25, 2007 and a Markman hearing is set for May 3, 2007 at 10:00 a.m.. For the reasons described below, Dow

Jones and Factiva now respectfully request that the Court extend the deadline for the filing of their Markman briefs by two weeks, to January 5, 2007. That extension will permit Dow Jones and Factiva to file a single, joint Markman Brief, which will render the claim construction proceedings more efficient and cost-effective for both the parties and the Court.

At the time these suits were filed, and at all times up to last Friday, December 15, 2006, Dow Jones and Factiva, although related parties, were under separate ownership. Factiva was limited liability corporation that was a joint venture between Dow Jones and Reuters Group PLC (“Reuters”). As a consequence, although the parties cooperated in connection with these actions, they necessarily conducted the litigation separately. On December 15, 2006, however, Dow Jones acquired from Reuters its interest in Factiva, making Factiva a wholly-owned subsidiary of Dow Jones. Now that Dow Jones and Factiva are under common ownership, the parties are able to coordinate fully their efforts in these actions.

Dow Jones and Factiva seek this extension to file their Markman brief in order to be able to prepare and file a single Markman brief. This coordination will eliminate a separate set of briefs for both parties, thereby saving them and the Court time and effort. Plaintiffs expect that this will help streamline the litigation. Thus, Dow Jones and Factiva respectfully request that the Court grant this joint motion to extend the deadlines in the scheduling order by two weeks. Counsel for Dow Jones has consulted with counsel for Defendants in both actions, who has advised that Defendants do not oppose this request.

A proposed order is attached.

Respectfully submitted,

Dated: December 18, 2006

/s/ Steven Lieberman
Steven Lieberman (D.C.# 439783)
Joseph A. Hynds (D.C.# 440464)
Rothwell, Figg, Ernst & Manbeck
1425 K Street, NW; Suite 800
Washington, D.C. 20005
(202) 783-6040 (telephone)

Counsel For Dow Jones & Company, Inc.

Dated: December 18, 2006

/s/ Creighton R. Magid
Creighton R. Magid (D.C.# 476961)
Dorsey & Whitney LLP
1050 Connecticut Ave., N.W.
Suite 1250
Washington, D.C. 20004-2505
(202) 442-3000 (telephone)
(202) 442-3199 (facsimile)

Devan V. Padmanabhan
Paul J. Robbennolt
Dorsey & Whitney LLP
Suite 1500, 50 South Sixth Street
Minneapolis, MN 55402-1498
(612) 340-2600 (telephone)
(612) 340-8856 (facsimile)

Counsel For Dow Jones Reuters Business
Interactive, LLC, d/b/a Factiva

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of December, 2006, a copy of the foregoing Joint Unopposed Motion to Extend Deadline to File Their Markman Brief was sent by first-class mail, postage prepaid to:

Amy S. Owen, Esquire
Cochran & Owen
8000 Towers Crescent Drive, Suite 160
Vienna, Virginia 22182

Thomas G. Scavone, Esquire
Niro, Scavone, Haller & Niro
181 W. Madison Street, Suite 4600
Chicago, Illinois 60602

Steven Lieberman, Esquire
Rothwell, Figg, Ernst & Manbeck
1425 K Street, N.W., Suite 800
Washington, D.C. 20005

/s/ Creighton R. Magid
Creighton R. Magid