

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

REPUBLIC OF PERU)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. <u>1:08-cv-2109</u>
)	Judge Henry H. Kennedy
YALE UNIVERSITY)	
)	
Defendant.)	
)	

PLAINTIFF REPUBLIC OF PERU'S MOTION FOR LEAVE TO FILE SUR-REPLY

Plaintiff Republic of Peru ("Peru") files this Motion for Leave to File Sur-Reply to the Reply of Yale University ("Yale") in Support of its Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue and states that Yale's Reply, like its Motion, is replete with serious mischaracterizations and distortions of the relevant legal authorities and the facts, including but certainly not limited to:

- The assertion that Yale's actions in and directed at the District of Columbia are not substantially connected to Peru's claims to satisfy the applicable standard for specific jurisdiction;
- Its attributing to Peru an argument that Peru never made about the applicable standard for specific jurisdiction;
- Yale's representation that it has no continuous and systematic contacts with the District of Columbia;
- Its attempt to shield itself from personal jurisdiction based on the "government contacts" doctrine; and
- Its argument that venue is improper in the District of Columbia but proper in Connecticut, despite the lack of legal or factual basis for such an argument.

For these reasons, Peru asks this Court for leave to file a brief Sur-Reply of approximately eight pages of argument, attached hereto.

Respectfully submitted,

/s/

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July 24, 2009

CERTIFICATE OF SERVICE

I hereby certify that, on this 24th day of July, 2009, the foregoing document was served via electronic mail to the following:

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/s/

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