

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CHRISTINE VARAD,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 06 CA 11370 MLW
v.	)	
	)	
REED ELSEVIER INCORPORATED,	)	
d/b/a/ Lexis Nexis Corporation,	)	
Lexis Nexis Accurint,	)	
	)	
Defendant.	)	

**DEFENDANT’S MOTION FOR LEAVE TO FILE REPLY BRIEF**

Pursuant to Local Rule 7.1(B)(3), defendant Reed Elsevier Inc. (“Reed”) moves for leave to file the short reply memorandum attached hereto as Exhibit A. In response to Reed’s three page motion for substitution of Seisint Inc. for defendant Reed Elsevier Inc. and to dismiss the complaint against Reed Elsevier Inc., plaintiff Christine Varad submitted a five page opposition with six exhibits. Reed’s attached reply memorandum is necessary to respond to Ms. Varad’s opposition and affidavit. Reed respectfully submits that the reply memorandum will assist the Court’s consideration of the motion for substitution.

REED ELSEVIER INC. and  
SEISINT, INC.  
By their attorneys,

/s/ Kristin M. Cataldo  
T. Christopher Donnelly (BBO #129930)  
Kristin M. Cataldo (BBO #654033)  
Donnelly, Conroy & Gelhaar, LLP  
One Beacon Street, 33<sup>rd</sup> Floor  
Boston, Massachusetts 02108  
(617) 720-2880

Dated: October 27, 2006

**LOCAL RULE 7.1 CERTIFICATION**

The undersigned counsel for defendant Reed Elsevier Inc. hereby certifies that on October 27, 2006, I telephoned pro se plaintiff Christine Varad and requested assent to the motion for leave to file reply brief. Ms. Varad refused to assent to the motion for leave.

/s/ Kristin M. Cataldo  
Kristin M. Cataldo

**CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>th</sup> day of October, 2006, I caused a copy of the foregoing to be served on the following by regular mail:

Christine M. Varad  
P.O. Box 582  
Milton, MA 02186

/s/ Kristin M. Cataldo  
Kristin M. Cataldo