

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 brief attached hereto as Exhibit A. Reed’s submits that the attached reply memorandum is necessary to respond to Ms. Varad’s opposition and to address certain issues raised therein. Reed respectfully submits that the reply brief will assist the Court’s consideration of Reed’s Motion To Stay. Ms. Varad has assented to the filing of the reply brief.

REED ELSEVIER INC.  
By its 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: November 22, 2006

**LOCAL RULE 7.1 CERTIFICATION**

The undersigned counsel for defendant Reed Elsevier Inc. hereby certifies that on November 22, 2006, I spoke with pro se plaintiff Christine Varad and requested assent to the motion for leave to file reply brief. Ms. Varad assented to the filing of the reply brief.

/s/ Kristin M. Cataldo  
Kristin M. Cataldo

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22<sup>nd</sup> day of November, 2006, I caused a copy of the foregoing to be served on the following by regular mail:

Christine M. Varad  
P.O. Box 583  
Milton, MA 02186

/s/ Kristin M. Cataldo  
Kristin M. Cataldo