

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

Civil Docket No.: **06 CA 11370 MLW**

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Christine Varad,  
Plaintiff,  
v.

Reed Elsevier Incorporated,  
d.b.a. *LexisNexis, LexisNexis Risk &  
Information Analytics Group, Inc.*,  
Defendant.

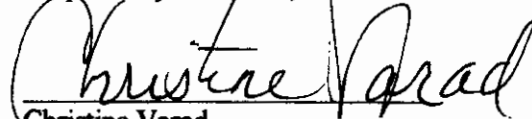
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**PLAINTIFF'S MOTION FOR LEAVE TO FILE REPLY BRIEF**

Pursuant to Local Rule 7.1(B)(3), Plaintiff, Christine Varad, moves for leave to file a short reply brief attached hereto as Exhibit A. Varad submits that the attached reply memorandum is necessary to respond to Reed Elsevier Inc.'s opposition to her motion to compel production of documents. A written response is needed to allow Varad an opportunity to clearly address all issues raised concerning multiple corporate entity interests as well as individual interests concerning discovery requests. Varad respectfully submits that the reply memorandum will assist the Court's consideration of Plaintiff's Motion to Compel Production of Documents.

June 18, 2007

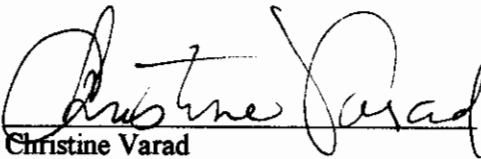
Respectfully submitted,



Christine Varad  
P.O. Box 583  
Milton, Massachusetts 02186  
781 534 8770

I certify that on the 21<sup>st</sup> day of June 2007, I caused a copy of "PLAINTIFF'S MOTION FOR LEAVE TO FILE REPLY BRIEF" to be served IN HAND on the attorney of record for defendant Reed Elsevier, Incorporated:

Kristin Cataldo  
Donnelly, Conroy and Gelhaar, LLP  
One Beacon Street, 33<sup>rd</sup> Floor  
Boston, Massachusetts 02108  
617 720 2880



Christine Varad