

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

VALENCIA M. MCCLATCHEY,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 05-145J
v.	)	
	)	
THE ASSOCIATED PRESS,	)	<b>JURY TRIAL DEMANDED</b>
	)	
Defendant.	)	
	)	

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**MOTION OF THE ASSOCIATED PRESS  
FOR LEAVE TO FILE A REPLY MEMORANDUM**

The Associated Press (“AP”) respectfully moves for leave to file a Reply Memorandum in Support of its Motion for Summary Judgment. The Reply Memorandum, which is attached hereto as Exhibit A, is necessary to address factual matters and rebut points of law raised in Plaintiff’s Response to AP’s motion and that were not discussed in AP’s initial brief.

Dated: June 29, 2006

Respectfully submitted,

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By: /s/ Robert Penchina  
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**CERTIFICATE OF SERVICE**

I, Michael Berry, hereby certify that on this 29th day of June, 2006, I caused to be served a true and correct copy of the foregoing Motion of The Associated Press for Leave to File a Reply Memorandum via the Court's ECF system, upon the following counsel of record:

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/s/ Michael Berry

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