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

VALENCIA M. MCCLATCHEY,

Plaintiff,

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THE ASSOCIATED PRESS,

Defendant.

Civil Action No. 05-00145J The Honorable Terence F. McVerry

JURY TRIAL DEMANDED

MS. MCCLATCHEY'S RESPONSE TO DEFENDANT'S REPLIES TO ITS MOTIONS IN LIMINE

The Court's April 23, 2007 Trial Scheduling Order set dates for initial motions in limine and responses, but did not contemplate reply briefs. Defendant has now filed three reply briefs without seeking leave of Court, and without consulting with Plaintiff's counsel. Therefore, Plaintiff respectfully objects to such reply briefs to Defendant's motions in limine (Docket Numbers 62, 63, and 64).

Respectfully submitted,

/s/ Douglas M. Hall Douglas M. Hall Paul K. Vickrey Kara L. Szpondowski Niro, Scavone, Haller & Niro 181 West Madison, Suite 4600 Chicago, Illinois 60602-4515 Phone: 312-236-0733 Fax: 312-236-3137 Attorneys for Valencia M. McClatchey John E. Hall Eckert Seamans Cherin & Mellott, LLC USX Tower 600 Grant Street, 44th Floor Pittsburgh, Pennsylvania 15219 Phone: (412) 566-6000 Fax: (412) 566-6099

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing **MS**. **MCCLATCHEY'S RESPONSE TO DEFENDANT'S REPLIES TO ITS MOTIONS IN LIMINE** was served upon the below listed parties on this 17th day of May 2007.

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/s/ Douglas M. Hall_