



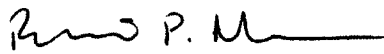
development, production, maintenance, and operation of the Divestiture Assets as set forth in the proposed Final Judgment. This information is not available to the public. Under Section IV.C. of the proposed Final Judgment, Defendants shall permit prospective Acquirers of the Divestiture Assets to have reasonable access to personnel described in Schedule 2 and shall not interfere with any negotiations by the Acquirer(s) to employ any such personnel. Descriptions contained in Schedule 2 are sufficiently specific that those knowledgeable about Defendants could ascertain the identities of many of the individuals, which could substantially prejudice the efficacy of the remedy set forth in the proposed Final Judgment. Public disclosure of the information in Schedule 2 is not necessary to the Court's evaluation whether the proposed Final Judgment is in the public interest pursuant to the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16.

Schedules 3 and 4 list the twenty-five largest contributors of aftermarket research and estimates data to Reuters. This information is not available to the public. These lists are referenced in Section IV.H. of the proposed Final Judgment. Public release of the identities of these contributors would expose Reuters' confidential business information and could substantially prejudice both Defendants' negotiations with those contributors as required by Section IV.H. and an Acquirer's subsequent business use of the Divestiture Assets. Such public release could substantially prejudice the efficacy of the remedy set forth in the proposed Final Judgment. Public disclosure of the information set forth in Schedules 3 and 4 is not necessary to the Court's evaluation whether the proposed Final Judgment is in the public interest pursuant to the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16.

For the foregoing reasons, Plaintiff and Defendants request that the Court permit Schedules 2, 3, and 4 of the proposed Final Judgment to be filed and maintained under seal.

Respectfully submitted,

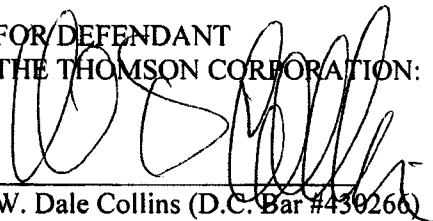
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