

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

UNITED STATES OF AMERICA,)	
)	
)	CASE NO.: 1:08-cv-00262
Plaintiff,)	Assigned To: Hogan, Thomas F.
)	Assign. Date: 02/19/2008
v.)	Description: Antitrust
)	
THE THOMSON CORPORATION, and)	
)	
REUTERS GROUP PLC,)	
)	
)	
Defendants.)	
)	

UNOPPOSED MOTION TO MODIFY FINAL JUDGMENT

Plaintiff United States of America ("United States") respectfully moves the Court, pursuant to Federal Rule of Civil Procedure 60(b)(5) and Section XIII of the Final Judgment entered in this matter on June 17, 2008 ("Final Judgment"), to modify the Final Judgment by entering the attached proposed Order to Modify the Final Judgment. Defendants The Thomson Corporation and Reuters Group PLC do not oppose the motion.

Under the terms of the Final Judgment, Defendants were required to divest the divestiture assets within five days after notice of entry of the Final Judgment. Furthermore, the Final Judgment provided that the United States could extend that deadline sixty days. The United States has granted several extensions, totaling sixty days, and does not have discretion to grant an extension beyond August 21, 2008. While Defendants have divested one set of divestiture

assets, they have yet to divest the Earnings Estimates and Aftermarket Research divestiture assets. On August 19, 2008 Defendants entered into a contract with an acquirer, but the United States has not yet had a chance to determine whether the acquirer and the purchase agreement meet the requirements of the Final Judgment.

The United States seeks modification of the Final Judgment to allow the United States to extend the deadline for sale of the divestiture assets an additional sixty days to allow the United States to investigate the suitability of the acquirer and divestiture proposal. The United States proposes to do so by modifying Paragraph IV.A of the Final Judgment to change the total length of time the United States may extend the deadline from 60 to 120 days, so that Paragraph IV.A would read as follows:

Defendants are ordered and directed, within sixty (60) calendar days after the filing of the Complaint in this matter, or five (5) calendar days after notice of the entry of this Final Judgment by the Court, whichever is later, to divest the Divestiture Assets in a manner consistent with this Final Judgment to an Acquirer(s) acceptable to the United States, in its sole discretion. The United States, in its sole discretion, may agree to one or more extensions of this time period not to exceed 120 calendar days in total, and shall notify the Court in such circumstances. Defendants shall use their best efforts to divest the Divestiture Assets as expeditiously as possible.

The proposed modification is equitable in nature and serves the public interest by effectuating the remedy intended in the Final Judgment. Accordingly, plaintiff United States

respectfully requests that the Court grant the Motion and enter the attached proposed Order to Modify the Final Judgment.

Dated: August 20, 2008

Respectfully submitted,

FOR PLAINTIFF
UNITED STATES OF AMERICA

/s/ Travis R. Chapman

Travis R. Chapman

Aaron Brodsky

Networks and Technology Enforcement Section

United States Department of Justice

Antitrust Division

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