

# UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION OFFICE OF ADMINISTRATIVE LAW JUDGES

05 21 2018 590831

In the Matter of

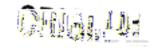
Tronox Limited a corporation,

National Industrialization Company (TASNEE) a corporation,

National Titanium Dioxide Company Limited (Cristal) a corporation,

And

Cristal USA Inc. a corporation.



Docket No. 9377

### RESPONDENTS' CERTIFICATION REGARDING MOTION TO COMPEL

I certify that before filing Respondents' Motion to Compel with regard to Cristal Interrogatory #1 on Monday, May 21, 2018, counsel for Respondents and Complaint Counsel met and conferred as follows:

On Tuesday, May 15, 2018, the parties met and conferred about a variety of matters, including Complaint Counsel's response to Cristal Interrogatory #1. Michael Williams, Michael DeRita, and Paul Suitter participated from Kirkland & Ellis, on behalf of Tronox, Ltd. ("Tronox"). James Cooper and Peter Levitas participated from Arnold & Porter on behalf of the National Titanium Dioxide Company Limited ("Cristal"). Dominic Vote, Joonsuk Lee, and Cem Aklemen participated on behalf of Complaint Counsel. The meeting took place by phone, beginning at 10:00 a.m. and ending at approximately 11:10 a.m. The parties undertook a good faith effort to

resolve the dispute over Cristal Interrogatory #1. Complaint Counsel agreed to supplement the response to Cristal Interrogatory #1 by 5:00 p.m. on May 17, 2018.

On Monday, May 21, 2018, the parties met and conferred again about Complaint Counsel's

#### **PUBLIC**

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ATTORNEYS FOR NATIONAL INDUSTRIALIZATION COMPANY (TASNEE), THE NATIONAL TITANIUM DIOXIDE COMPANY LIMITED (CRISTAL), AND CRISTAL USA INC.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on May 21, 2018, I filed the foregoing document electronically using the FTC's E-Filing System, which will send notification of such filing to:

Donald S. Clark Secretary Federal Trade Commission 600 Pennsylvania Ave., NW, Rm. H-113 Washington, DC 20580 ElectronicFilings@ftc.gov

The Honorable D. Michael Chappell Administrative Law Judge Federal Trade Commission 600 Pennsylvania Ave., NW, Rm. H-110 Washington, DC 20580

I also certify that I caused the foregoing document to be served via email to:

Chuck Louglin James L. Cooper Dominic Vote Seth Wiener

Federal Trade Commission

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Counsel supporting Complaint Counsel for Respondents National Industrialization

Company (TASNEE), The National Titanium Dioxide Company Limited (Cristal), and Cristal

USA, Inc.

/s/ Michael F. Williams Michael F. Williams

Counsel for Respondents Tronox Limited

**PUBLIC** 

## **CERTIFICATE FOR ELECTRONIC FILING**

I certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the paper original and that I possess a paper original of the signed document that is available for review by the parties and the adjudicator.

May 21, 2018 By: /s/ Michael F. Williams

Michael F. Williams

#### Notice of Electronic Service

I hereby certify that on May 22, 2018, I filed an electronic copy of the foregoing Respondents' Motion to Compel Complaint Counsels' Response to Cristal Interrogatory #1, with:

D. Michael Chappell Chief Administrative Law Judge 600 Pennsylvania Ave., NW Suite 110 Washington, DC, 20580

Donald Clark 600 Pennsylvania Ave., NW Suite 172 Washington, DC, 20580

I hereby certify that on May 22, 2018, I served via E-Service an electronic copy of the foregoing Respondents' Motion to Compel Complaint Counsels' Response to Cristal Interrogatory #1, upon:

Seth Wiener Arnold & Porter Kaye Scholer LLP seth.wiener@apks.com Respondent

Matthew Shultz Arnold & Porter Kaye Scholer LLP matthew.shultz@apks.com Respondent

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Peggy D. Bayer Femenella Attorney Federal Trade Commission pbayer@ftc.gov Complaint

Grace Brier Kirkland & Ellis LLP grace.brier@kirkland.com Respondent

Alicia Burns-Wright Attorney Federal Trade Commission aburnswright@ftc.gov Complaint

I hereby certify that on May 22, 2018, I served via other means, as provided in 4.4(b) of the foregoing Respondents' Motion to Compel Complaint Counsels' Response to Cristal Interrogatory #1, upon:

Seth Weiner Arnold & Porter Kaye Scholer LLP Respondent

 $\frac{Andrew\ Pruitt}{Attorney}$