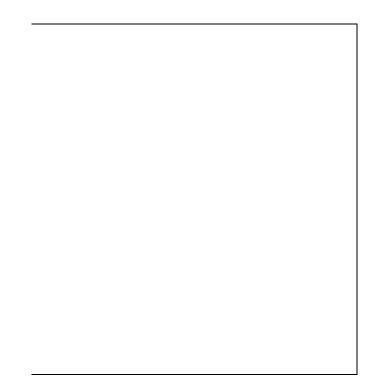


Because the matter is no longer pending before the Administrative Law Judge,¹ the Commission in its discretion may issue an order withdrawing from adjudication those portions of the matter that the proposal would resolve for the purpose of considering a consent proposal under Rule 3.25(d), 16 C.F.R. § 3.25(d).

The attached consent proposal consists of the following documents: (1) Agreement Containing Consent Orders; (2) proposed Decision and Order; and (3) proposed Order to Maintain Assets (collectively the "Consent Proposal"). The Parties have reviewed and agreed to the terms of the Consent Proposal subject to Commission review and approval. The Parties represent that the Consent Proposal details the agreed-upon material terms and that the Consent Proposal would resolve the matter before the Commission in its entirety. Thus, the Parties jointly request that the matter be removed from adjudication so the Commission may consider the Consent Proposal.

¹ On Friday, December 7, 2018, the Chief Administrative Law Judge issued an Initial Decision and Order. Because



CONFIDENTIAL CONSENT PROPOSAL

REDACTED IN ENTIRETY

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2019, I filed the foregoing document electronically using the FTC's E-Filing System, which will send notification of such filing to:

April J. Tabor Acting Secretary Federal Trade Commission 600 Pennsylvania Ave., NW, Rm. H-113 Washington, DC 20580 ElectronicFilings@ftc.gov

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

Michael F. Williams Karen McCartan DeSantis Matthew J. Reilly Travis Langenkamp

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Counsel for Respondents National Industrialization Company (TASNEE), The National Titanium Dioxide Company Limited (Cristal), and Cristal USA, Inc.

<u>/s/ Blake Risenmay</u> Blake Risenmay Counsel Supporting the Complaint

CERTIFICATE FOR ELECTRONIC FILING