

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



**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 Switter 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 supplemented response to Cristal Interrogatory #1. The meeting took place by phone at 11:00am and lasted approximately 20 minutes. Megan Wold, Zachary Avallone, and Don Hong participated from Kirkland & Ellis LLP on behalf of Tronox. James Cooper, Peter Levitas, and Ryan Watts participated from Arnold & Porter on behalf of Cristal. Joonsuk Lee and Cem Aklemen participated on behalf of Complaint Counsel. The parties were unable to reach an agreement about the adequacy of Complaint Counsel's response to Cristal Interrogatory #1.

Dated: May 21, 2018

Respectfully Submitted By:

/s/ Michael F. Williams, P.C.  
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**ATTORNEYS FOR NATIONAL  
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(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](mailto: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 Loughlin  
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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

**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:**

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**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

Andrew Pruitt  
Attorney