

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA  
c/o Department of Justice  
Washington, D.C. 20530,  
Plaintiff,

v.

LEN BLAVATNIK  
c/o Access Industries  
28 Kensington Church Street, 4<sup>th</sup> Floor  
London, United Kingdom W8 4EP  
Defendant.

Civil Action No.

**STIPULATION**

It is stipulated by and between the undersigned parties, by their respective attorneys, that:

(1) the parties consent that the Court may file and enter a Final Judgment in the form attached to this Stipulation, on the Court's own motion or on the motion of any party at any time, and without further notice to any party or other proceedings, if Plaintiff has not withdrawn its consent, which it may do at any time before the entry of judgment by serving notice of its withdrawal on Defendant Len Blavatnik and filing that notice with the Court;

(2) Defendant Len Blavatnik waives any objection to venue or jurisdiction for purposes of this Final Judgment and authorizes Daniel Abuhoff of Debevoise & Plimpton LLP to accept service of all process in this matter on his behalf;

(3) in the event Plaintiff withdraws its consent or if the proposed Final Judgment is not entered pursuant to this Stipulation, this Stipulation shall be of no effect whatsoever and the

making of this Stipulation shall be without prejudice to any party in this or any other proceeding;  
and

(4) the entry of the Final Judgment in accordance with this Stipulation settles, discharges, and releases any and all claims of Plaintiff, the United States, for civil penalties pursuant to Section 7A(g)(1) of the Clayton Act, 15 U.S.C. § 18a(g)(1), against Defendant for failure to comply with Section 7A of the Clayton Act, 15 U.S.C. § 18a, in connection with Defendant's acquisition of voting securities of TangoMe, Inc. in 2014, and Defendant's acquisition of voting securities of LyondellBasell Industries N.V. in 2010.

**FOR THE DEFENDANT:**

Len Blavatnik


By:



Daniel Abuhoff.  
Debevoise & Plimpton LLP  
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New York, NY 10022  
Counsel for Defendant Len Blavatnik

Dated: June 24, 2015

**FOR THE PLAINTIFF:**



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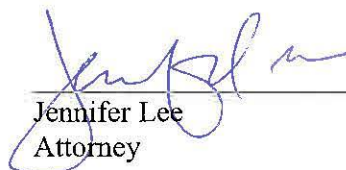
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