

**UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION**

In the Matter of
UNION OIL COMPANY OF CALIFORNIA,
a corporation.

Docket No. 9305

COMPLAINT COUNSEL'S FIRST SET OF REQUESTS FOR ADMISSIONS

Pursuant to Rule 3.32 of the Federal Trade Commission's Rules of Practice for Adjudicative Proceedings, 16 C.F.R. §§ 3.32, Complaint Counsel hereby requests that Respondent Union Oil Company of California ("Unocal") serve a written response to the following requests for admissions within twenty (20) days of service of this request.

REQUESTS FOR ADMISSIONS

1. Admit that Patent No. 5,288,393 is valid.
2. Admit that Patent No. 5,593,567 is valid.
3. Admit that Patent No. 5,653,866 is valid.
4. Admit that Patent No. 5,837,126 is valid.
5. Admit that Patent No. 6,030,521 is valid.
6. Admit that Patent No. 5,593,567 is presumed valid pursuant to 35 U.S.C. § 282.
7. Admit that Patent No. 5,653,866 is presumed valid pursuant to 35 U.S.C. § 282.
8. Admit that Patent No. 5,837,126 is presumed valid pursuant to 35 U.S.C. § 282.
9. Admit that Patent No. 6,030,521 is presumed valid pursuant to 35 U.S.C. § 282.
10. Admit that Unocal will not enforce Patent No. 5,288,393.
11. Admit that Unocal will not enforce Patent No. 5,593,567.
12. Admit that Unocal will not enforce Patent No. 5,653,866.

13. Admit that Unocal will not enforce Patent No. 5,837,126.
14. Admit that Unocal will not enforce Patent No. 6,030,521.

DEFINITIONS

1. "Unocal" for the purpose of this request for admissions, means the Union Oil Company of California, Unocal Corporation, and any affiliate, subsidiary, or division thereof.

INSTRUCTIONS

1. Each request for admission shall be answered fully in writing.
2. Each request for admission shall be answered upon your entire knowledge from all sources, including all information in the possession, actual or constructive, of you or your attorneys, you or your investigators, or persons working on your behalf.
3. If, after exercising due diligence, you cannot answer the following requests, so state and answer to the extent possible, specifying your inability to answer the remainder. State whatever information or knowledge you have concerning the unanswered portion, and detail what you did in attempting to secure the unknown information.
4. If you object to a portion or an aspect of any request, state the grounds for your objection with specificity and answer the remainder of the request.

Respectfully submitted,

J. Robert Robertson
Chong S. Park
Counsel Supporting the Complaint

Bureau of Competition
Federal Trade Commission
Washington, DC 20580

Dated: July 29, 2003