

Attachment 1

Hill, Christine A

From: info@nikocontracting.com
Sent: Wednesday, January 18, 2006 10:09 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 18, 2006, 10:09 am by:

Petitioner name Nicholas D. Lardas
Occupation Roofing Contractor
State of Residence .. PA
Email address info@nikocontracting.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparent that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, coerce and manipulate trade practices.

Clay roofing tiles are known for their durability, with service lives reaching and exceeding one hundred years. Every tile rooftop also includes essential "trim" pieces. These high-wear pieces (corners, edges, special coverings) tend to require earlier repair and replacement - yet the trim represents only a fraction of the overall cost and worth of a rooftop. These factors all contribute to the strong market for clay tile salvage and restoration existing today.

By openly refusing to sell essential trim products -without a "field tile" order (large areas of new tile), Ludowici subverts the efficient reuse of high-quality clay tile roofing materials and undermines the business model of a vibrant sector of the restoration industry.

Therefore it is my opinion that the Ludowici Company's refusal to sell trim without a field tile order demonstrates behavior that is consistent with its pre-1929 actions, and violates the terms of the Decree. Removing the Decree would endanger the public's right to free and fair competition in the Clay Tile Roofing Industry.

Additional COMMENT from Nicholas D. Lardas

Hill, Christine A

From: robert.raleigh.iii@claytileroof.com
Sent: Friday, January 13, 2006 3:35 PM
To: Hill, Christine A
Subject: Ludowici Roof Tile



tmp.htm

Dear Ms. Hill:

Renaissance Roofing, Inc is a historic roofing company with over 60 employees that are committed to preserving the historic roofs of the United States. Our company utilizes, when ever possible, salvaged or used clay roofing tiles for its restoration work. However, we do need special tiles know as the trim tiles to complete our work on grand-old and often times Nation Trust for Historic Preservation buildings. Without these special trim tiles, these roofs would not be able to be completed or restored.

Until recently we have been able to purchase these tiles from Ludowici Roof Tile, Inc. of New Lexington, Ohio. The company has now refused to sell us trim tiles for this purpose and is requiring us to purchase un-needed roof tiles when we do so. In several instances we have had orders refused because we did not order the field tiles.

Without the ability to purchase these proprietary tiles from Ludowici, we will be unable to competitively compete in the market place. Until an effective alternative source of these tiles materializes, Ludowici Roof Tile is the only source.

Many tiles have been imported from foreign countries to supplement this demand, but not one has shown to be suitable alternative. Allowing Ludowici Roof Tile to revert to the practice of discriminating and restricting trade has already damaged the lively hood of Renaissance Roofing, Inc and its employees.

Respectfully Submitted,

Robert W. Raleigh, III

Vice-President

Renaissance Roofing, Inc

2231 Hawkey Drive

Belvidere, IL 61008

Hill, Christine A

From: tjc1221@insightbb.com
Sent: Wednesday, January 11, 2006 4:13 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 11, 2006, 4:12 pm by:

Petitioner name Jason Clancy
Occupation Information Technology Consultant
State of Residence .. IL
Email address tjc1221@insightbb.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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By openly refusing to sell essential trim products -without a "field tile" order (large areas of new tile), Ludowici subverts the efficient reuse of high-quality clay tile roofing materials and undermines the business model of a vibrant sector of the restoration industry.

Therefore it is my opinion that the Ludowici Company's refusal to sell trim without a field tile order demonstrates behavior that is consistant with its pre-1929 actions, and violates the terms of the Decree. Removing the Decree would endanger the public's right to free and fair competition in the Clay Tile Roofing Industry.

Additional COMMENT from Jason Clancy

Hill, Christine A

From: ssureeldua@msn.com
Sent: Wednesday, January 11, 2006 2:39 PM
To: Hill, Christine A
Subject: Ludowici Roof Tile DOES Dominate the Historic Market



tmp.htm

Ms. Christine Hill,

The proof of the dominance of this company in our country's historic market is spelled out precisely in the original Anti-Trust Decree (see Sec. VI, Execution of the Conspiracy).

After all, the original applications of the Historic Roofing Tile market in our country covers the periods which were cited in the existing anti-trust decree against Ludowici-Celadon Company (Now The Ludowici Roof Tile Company). When they acquired the major roofing tile manufacturing facilities (besides the original two - Chicago, ILL and Ludowici, GA) they acquired the interstate businesses of the following companies: The Celadon Roofing Tile Company of New York; The Imperial Clay Company of Ohio; The Western Roofing Company of Missouri; and the Mid-Continent Clay Company of Texas

Ludowici, at this point, literally owned the service and replacement business of over 90% of the existing homes and/or buildings using clay roofing tile. This equation still exists today in the historic market because the rooftops sold during this period have become our young country's historic gems. Most of the few remaining American clay tile companies of that earlier time (who produced tile to withstand freeze/thaw conditions) did not withstand this onslaught and remain viable. Unfortunately, we lost them and we lost some lovely clay roofing tiles too.

The problem is exacerbated by the fact that newly manufactured roofing tile does not match historic roofing tile. It cannot as the manufacturing process has been completely altered resulting in a different appearance. It is apples and oranges ... they do not match.

Therefore the Clay Roofing Tile in our historic market today is almost entirely serviced by Ludowici. Any change in their ability and/or desire to service these structures would result in escalating prices for restoration which would then include not only a completely new roof (the historic tile would be lost) but also the expense of hauling the perfectly good, nearly antique, clay tiles to a landfill which would accept them. Of course, the businesses dealing with recycled tile would be unable to satisfy their customers needs. These results would deal a serious blow to any preservation project either major (government and business buildings) or private (homes, apartments and condominiums) even as it would have negative impact on our environment.

Thank you for your consideration,

Lee Russ McGee
The Tile Man, Inc.

Hill, Christine A

From: tbollnow@nrca.net
Sent: Wednesday, January 11, 2006 1:48 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 11, 2006, 1:47 pm by:

Petitioner name Thomas Bollnow
Occupation Senior Technical Director
State of Residence .. IL
Email address tbollnow@nrca.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Thomas Bollnow

I wholeheartedly agree that to deny the restoration of perfectly usable historical tile contradicts the current industry (and nationwide) movement toward sustainable construction. Sustainable including durability, recyclability, energy efficiency, etc.

Hill, Christine A

From: james.zipse@claytileroof.com
Sent: Wednesday, January 11, 2006 10:45 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 11, 2006, 10:45 am by:

Petitioner name James Zipse
Occupation Partner of Renaissance Roofing Inc
State of Residence .. IL
Email address james.zipse@claytileroof.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from James Zipse

WE MUST PUT A STOP TO THIS!!!!!!!!!!!!!!!!!!!!

Hill, Christine A

From: mulliganrestoration@charter.net
Sent: Wednesday, January 11, 2006 8:37 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 11, 2006, 8:36 am by:

Petitioner name rory mulligan
Occupation general contractor
State of Residence .. il
Email address mulliganrestoration@charter.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from rory mulligan

Hill, Christine A

From: /S=kai loema@aol.com/O=INETGW/P=GOV+DOJ/A=TELEMAIL/C=US/
Sent: Tuesday, January 10, 2006 5:51 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 5:50 pm by:

Petitioner name kai a loema
Occupation tile/slate project foreman
State of Residence .. il
Email address kai loema@aol.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from kai a loema

i have been in the tile/slate roofing business for aprox 12 yrs,75% of our projects are tile restorations,we rely(unfortunatly)on ludiwicci tile co. for a lot of specialty trim pieces.
not only do we have to pay outragous fees for poor quality products,the customer service is close to none.
ludiwicci tile co. operates under the premiss.... (u need us... we dont need you)another prime example of a big corperation pushing the the little man out to take control of the tile market, (new and used)!as an average hard working AMERICAN i ask you to stop the termination of FINAL DECREE of 1929. this is a french owned corperation,we are AMERICAN workers trying to preserve OUR future,OUR way of life!
thank you...

Hill, Christine A

From: robcags@cox.net
Sent: Tuesday, January 10, 2006 5:40 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 5:40 pm by:

Petitioner name Robert Cagnetta
Occupation Preservation Specialist
State of Residence .. RI
Email address robcags@cox.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Robert Cagnetta

Please don't allow corporate greed and ignorance to prevent the practical maintenance and preservation of our cultural heritage.

Hill, Christine A

From: gderry@renroof.com
Sent: Tuesday, January 10, 2006 3:55 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 3:55 pm by:

Petitioner name Gregory Derry
Occupation Supervisor of Field Operations
State of Residence .. MO
Email address gderry@renroof.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Gregory Derry

My employer, Renaissance Roofing specializes in restoring tile and slate roofs. We are able to obrain field material without much difficulty. Trim accessories are very hard to come by in salvaged material and new trim accessories are in many cases our only option. Without the ability to optain new trim accessories, we cannot restore many of these roof systems using primarily the original tile. This also adds sugnificant cost to the homeowner who may very well decide to convert to an asphalt shingle.

Hill, Christine A

From: momkerb4@voyager.net
Sent: Tuesday, January 10, 2006 2:43 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 2:43 pm by:

Petitioner name C E Kerber
Occupation Artist
State of Residence .. OH
Email address momkerb4@voyager.net

PETITION

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Additional COMMENT from C E Kerber

Hill, Christine A

From: jak@claytileroof.com
Sent: Tuesday, January 10, 2006 1:48 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 1:47 pm by:

Petitioner name Jeffrey A. Kassel
Occupation Management
State of Residence .. IL
Email address jak@claytileroof.com

PETITION

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Additional COMMENT from Jeffrey A. Kassel

GM and Ford would not be allowed to forego the sale of replacement parts without a new car order. Neither should Ludowici be allowed to limit the sale of essential replacement pieces for historic roofs.

Hill, Christine A

From: kristy.iverson@claytileroof.com
Sent: Tuesday, January 10, 2006 1:39 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 1:39 pm by:

Petitioner name Kristine A. Iverson
Occupation Office Manager
State of Residence .. IL
Email address kristy.iverson@claytileroof.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Kristine A. Iverson

Some of Ludowici's employees will blatently tell you they "can do whatever they want and no one can stop them"

Hill, Christine A

From: jenn_baxter@excite.com
Sent: Tuesday, January 10, 2006 11:32 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 11:31 am by:

Petitioner name Jennifer Baxter
Occupation Sales
State of Residence .. IA
Email address jenn_baxter@excite.com

PETITION

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Additional COMMENT from Jennifer Baxter

Hill, Christine A

From: anarvaez@johnmilnerassociates.com
Sent: Tuesday, January 10, 2006 11:08 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 11:08 am by:

Petitioner name Alfonso Narvaez
Occupation Senior Associate, John Milner Associates, Inc.
State of Residence .. VA
Email address anarvaez@johnmilnerassociates.com

PETITION

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By openly refusing to sell essential trim products -without a "field tile" order (large areas of new tile), Ludowici subverts the efficient reuse of high-quality clay tile roofing materials and undermines the business model of a vibrant sector of the restoration industry.

Therefore it is my opinion that the Ludowici Company's refusal to sell trim without a field tile order demonstrates behavior that is consistant with its pre-1929 actions, and violates the terms of the Decree. Removing the Decree would endanger the public's right to free and fair competition in the Clay Tile Roofing Industry.

Additional COMMENT from Alfonso Narvaez

In my opinion, good preservation practice as codified in the Secretary of the Interior's Standards for Historic Preservation, and similar professional guidance, dictates that the ability to selectively repair or replace historic character defining elements such as clay tile roofing is a cornerstone of our industry. Any action that effectively restricts our ability to do this is unacceptable and I recommend that an appropriate exception be made to prevent this from occurring.

Hill, Christine A

From: edfrench64_44@hotmail.com
Sent: Tuesday, January 10, 2006 11:03 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 11:02 am by:

Petitioner name Edward P. French
Occupation Safety Consultant
State of Residence .. IL
Email address edfrench64_44@hotmail.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Edward P. French

The current Decree should remain in place, so the restoration business can continue.
Thank You

Hill, Christine A

From: gloria.totz@claytileroof.com
Sent: Tuesday, January 10, 2006 10:55 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 10:55 am by:

Petitioner name Gloria Totz
Occupation secretary
State of Residence .. IL
Email address gloria.totz@claytileroof.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Gloria Totz

My job is at risk if this Restraint of Trade is removed, plus the land fills will fill up very quick with UNNECESSARY WASTE of salvagable tile.

Hill, Christine A

From: danacb@pella.com
Sent: Tuesday, January 10, 2006 10:35 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 10:34 am by:

Petitioner name Christopher Dana
Occupation Construction Industry Manager
State of Residence .. IA
Email address danacb@pella.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparent that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, coerce and manipulate trade practices.

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Additional COMMENT from Christopher Dana

We are already seeing too many historic roofs replaced with asphalt shingle. If this continues, we will soon forget the true beauty of a tile roof and it's place in America's building industry. Do not allow Ludowici to monopolize this market.

Respectfully,
Chris Dana

Hill, Christine A

From: danielle.cornwell@claytileroof.com
Sent: Tuesday, January 10, 2006 9:55 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 9:55 am by:

Petitioner name Danielle Cornwell
Occupation Human resource Manager
State of Residence .. IL
Email address danielle.cornwell@claytileroof.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Danielle Cornwell

I can not even beleive that this is an issue. What gives Ludowici the right to monopolize Companies that are trying to preserve the history of many of our nation's homes and buildings.

Hill, Christine A

From: jsanders@claytileroof.com
Sent: Tuesday, January 10, 2006 9:32 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 9:32 am by:

Petitioner name Jennifer Sanders
Occupation Administrative Assistant
State of Residence .. IL
Email address jsanders@claytileroof.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Jennifer Sanders

Hill, Christine A

From: Pammy664@hotmail.com
Sent: Tuesday, January 10, 2006 9:26 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 9:26 am by:

Petitioner name Pam Nowak
Occupation Administrative Assistant
State of Residence .. MO
Email address Pammy664@hotmail.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Pam Nowak

Hill, Christine A

From: lon.gorsch@claytileroof.com
Sent: Tuesday, January 10, 2006 8:38 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 8:38 am by:

Petitioner name Lon Gorsch
Occupation Used Tile Sales
State of Residence .. IL
Email address lon.gorsch@claytileroof.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Lon Gorsch

Hill, Christine A

From: eric.loema@claytileroof.com
Sent: Tuesday, January 10, 2006 6:34 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 10, 2006, 6:34 am by:

Petitioner name Eric P. Loema
Occupation Tile/ Slate Roofing Sales Associate
State of Residence .. IL
Email address eric.loema@claytileroof.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Eric P. Loema

Hill, Christine A

From: mjlengyel@gmail.com
Sent: Monday, January 09, 2006 7:47 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 9, 2006, 7:46 pm by:

Petitioner name Michael J. Lengyel
Occupation Architectural Conservator
State of Residence .. VA
Email address mjlengyel@gmail.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Michael J. Lengyel

Please consider the above. Free market economics aside, when a company chooses to eliminate a market sector by aggressive sales tactics or by descrimitating against that sector they should not be rewarded with a defacto parole. Restraint of free trade is non-productive no matter how small the market niche because of cascading side effects such as projects being delayed or cancelled or redesigned.

Hill, Christine A

From: wwwuser@yourhostingaccount.com
Sent: Monday, January 09, 2006 6:53 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 9, 2006, 6:53 pm by:

Petitioner name Sara B. Chase
Occupation
State of Residence ..
Email address

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Sara B. Chase

Hill, Christine A

From: mstout@presnc.org
Sent: Monday, January 09, 2006 2:05 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 9, 2006, 2:05 pm by:

Petitioner name Michael Stout
Occupation Preservationist
State of Residence .. NC
Email address mstout@presnc.org

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Michael Stout

These new requirements would put our historic roof tops in grave danger. It is already an expensive endeavor to maintain and repair these historic materials and therefore does not need to be made even more expensive by having to replace perfectly good tiles. It also would add even more waste of perfectly good materials to our landfields.

Hill, Christine A

From: dffreerksen@comcast.net
Sent: Monday, January 09, 2006 12:47 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 9, 2006, 12:47 pm by:

Petitioner name Doug Freerksen
Occupation restoration contractor
State of Residence .. IL
Email address dffreerksen@comcast.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Doug Freerksen

Hill, Christine A

From: SBaker@idahopower.com
Sent: Monday, January 09, 2006 10:38 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 9, 2006, 10:37 am by:

Petitioner name Shane A. Baker
Occupation Cultural Resource Manager
State of Residence .. ID
Email address SBaker@idahopower.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Shane A. Baker

Hill, Christine A

From: dkaarre@hotmail.com
Sent: Monday, January 09, 2006 10:25 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 9, 2006, 10:24 am by:

Petitioner name Douglas Kaarre
Occupation Urban Planner
State of Residence .. IL
Email address dkaarre@hotmail.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Douglas Kaarre

Hill, Christine A

From: Sharon@historicproperties.com
Sent: Monday, January 09, 2006 8:56 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 9, 2006, 8:55 am by:

Petitioner name Sharon Hinson
Occupation advertising
State of Residence .. GA
Email address Sharon@historicproperties.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

Clay roofing tiles are known for their durability, with service lives reaching and exceeding one hundred years. Every tile rooftop also includes essential "trim" pieces. These high-wear pieces (corners, edges, special coverings) tend to require earlier repair and replacement - yet the trim represents only a fraction of the overall cost and worth of a rooftop. These factors all contribute to the strong market for clay tile salvage and restoration existing today.

By openly refusing to sell essential trim products -without a "field tile" order (large areas of new tile), Ludowici subverts the efficient reuse of high-quality clay tile roofing materials and undermines the business model of a vibrant sector of the restoration industry.

Therefore it is my opinion that the Ludowici Company's refusal to sell trim without a field tile order demonstrates behavior that is consistant with its pre-1929 actions, and violates the terms of the Decree. Removing the Decree would endanger the public's right to free and fair competition in the Clay Tile Roofing Industry.

Additional COMMENT from Sharon Hinson

This lifting of the injunction will further accelerate the loss of clay tiled roofs in the US. Instead of increasing the business of the company, it will cause its demise over a period of time.

Hill, Christine A

From: faye_erickson@hotmail.com
Sent: Monday, January 09, 2006 12:50 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 9, 2006, 12:49 am by:

Petitioner name Faye Erickson
Occupation faye_erickson@hotmail.com
State of Residence .. x
Email address faye_erickson@hotmail.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Faye Erickson

I have been actively involved in historic preservation for years and it would be a shame to legally block the preservation of thhis important piece of American history. Ludowici has always been a leader in the industry and manufacturer of an exquisite product. Instead of blocking the efforts to resell their roof tiles they should be proud of both their durability and their historical influence.

Hill, Christine A

From: arcphoto@pacbell.net
Sent: Sunday, January 08, 2006 5:35 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 8, 2006, 5:35 pm by:

Petitioner name Richard J. Levy, AIA, APA
Occupation Preservation Architect
State of Residence .. CA
Email address arcphoto@pacbell.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Richard J. Levy, AIA, APA

Hill, Christine A

From: joel@joelburns.com
Sent: Sunday, January 08, 2006 2:51 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 8, 2006, 2:50 pm by:

Petitioner name Joel Burns
Occupation Residential Realtor & Historic Pres. Consultant
State of Residence .. TX
Email address joel@joelburns.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Joel Burns

Hill, Christine A

From: claytileone@aol.com
Sent: Sunday, January 08, 2006 10:53 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 8, 2006, 10:52 am by:

Petitioner name Chris R. Branstetter
Occupation Historical Restoration Roofing
State of Residence .. OK
Email address claytileone@aol.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Chris R. Branstetter

SAVE THE ROOF SYSTEMS ON OUR BUILDINGS THAT SHARE OUR HISTORY AND OUR PAST

Hill, Christine A

From: buckeyelt@hotmail.com
Sent: Friday, January 06, 2006 2:19 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 6, 2006, 2:19 pm by:

Petitioner name Larry W. Thompson
Occupation Sales Manager
State of Residence .. OH
Email address buckeyelt@hotmail.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Larry W. Thompson

I am speaking out against the practice of large companies resorting to illegal and predatory business practices against smaller competitors in order to maintain a superior market position that might not exist under fair business conditions. I also wish to see America's architectural heritage preserved.

Hill, Christine A

From: nick1@rooftilemanagement.com
Sent: Friday, January 06, 2006 11:40 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 6, 2006, 11:39 am by:

Petitioner name Nick Mather
Occupation Roofing Contractor Owner
State of Residence .. ON
Email address nick1@rooftilemanagement.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Nick Mather

We here in Canada are equally affected, as there are many Ludowici roofs here that need servicing every year. The companys' approach to people who have purchased their product over the past 75 years or so is deplorable.They, afterall are the ones who have effectively invested in Ludowici, and are now being held liable for their investment.How fair is that?

Hill, Christine A

From: gail@shelbyvillekentucky.com
Sent: Friday, January 06, 2006 8:27 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 6, 2006, 8:26 am by:

Petitioner name Gail Reed
Occupation Historic District Coordinator
State of Residence .. KY
Email address gail@shelbyvillekentucky.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Gail Reed

Hill, Christine A

From: pmaclean@breeseearchitects.com
Sent: Thursday, January 05, 2006 3:51 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 5, 2006, 3:50 pm by:

Petitioner name Peter MacLean
Occupation Architectural Designer/ Associate
State of Residence .. MA
Email address pmaclean@breeseearchitects.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparent that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, coerce and manipulate trade practices.

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Additional COMMENT from Peter MacLean

Hill, Christine A

From: cragsmear@yahoo.com
Sent: Thursday, January 05, 2006 7:24 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 5, 2006, 7:24 am by:

Petitioner name H Peter Morehouse
Occupation Estimating
State of Residence .. CT
Email address cragsmear@yahoo.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from H Peter Morehouse

Hill, Christine A

From: kkettering@bakerroofing.com
Sent: Wednesday, January 04, 2006 3:35 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 4, 2006, 3:34 pm by:

Petitioner name KURT KETTERING
Occupation PROJECT MANAGER for roofing contractor
State of Residence .. NC
Email address kkettering@bakerroofing.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from KURT KETTERING

Hill, Christine A

From: blackrj@burns-scalo.com
Sent: Tuesday, January 03, 2006 4:45 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 3, 2006, 4:45 pm by:

Petitioner name RALPH BLACK JR.
Occupation ESTIMATOR/SALESMAN
State of Residence .. PA
Email address blackrj@burns-scalo.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparent that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from RALPH BLACK JR.

Used tile needs to be available for people who own old tile roofs. The average annual tile replacement is approximately 10-15 tiles per year which are sold by salvage tile companies by the piece + shipping. (Most times a good match - color, pollution on tile, etc.) People cannot be expected to purchase a set minimum of tile + set up charge + broken pallet charge + shipping for such few pieces needed. (This is an example of Ludowici's way of serving the customer.)

Hill, Christine A

From: cross_ct@bellsouth.net
Sent: Tuesday, January 03, 2006 7:08 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 3, 2006, 7:07 am by:

Petitioner name Steve Hancock
Occupation Cross Country Distributing
State of Residence .. KY
Email address cross_ct@bellsouth.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, coreerce and manipulate trade practices.

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Additional COMMENT from Steve Hancock

Ludowici has been difficult to work with for years... now they want to become impossible.

Hill, Christine A

From: mjmulaneco@msn.com
Sent: Monday, January 02, 2006 6:04 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 2, 2006, 6:04 pm by:

Petitioner name Michael J. Mullane
Occupation Manufacturing
State of Residence .. MA
Email address mjmulaneco@msn.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Michael J. Mullane

I support the petitioners.

Hill, Christine A

From: chris@formationroofing.com
Sent: Monday, January 02, 2006 1:57 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 2, 2006, 1:56 pm by:

Petitioner name Chris Underwood
Occupation Pres. Formation Roofing & Sheet Metal Inc.
State of Residence .. IN
Email address chris@formationroofing.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Therefore it is my opinion that the Ludowici Company's refusal to sell trim without a field tile order demonstrates behavior that is consistant with its pre-1929 actions, and violates the terms of the Decree. Removing the Decree would endanger the public's right to free and fair competition in the Clay Tile Roofing Industry.

Additional COMMENT from Chris Underwood

This is a very simple but complicated issue that will hurt hundreds of small tile roofing contractors like ourselves. This is a move by Ludowici that is GOING to cost all homeowners who have older tile roofs in need of repair ,literally thousands of dollars. Please do not allow this attempt by Ludowici to change current law that allows this to happen.

Thank You
Chris Underwood

Hill, Christine A

From: steeplejack1@charter.net
Sent: Sunday, January 01, 2006 6:58 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted January 1, 2006, 6:57 pm by:

Petitioner name paul wiederhold
Occupation historic roof restorer
State of Residence .. NC
Email address steeplejack1@charter.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from paul wiederhold

my company recently restored the Callenwolde Museum in Atlanta after tree damage. we called our re-claimed tile rep's hoping to find a match. we did for the field tile but needed extra trim and custom valley pieces. ludowici's response to this situation through our licensed rep was that they had to send an official measuring team, and there were minimum numbers of trim and profiles that had to be ordered. this all at significant cost and tile quantities we didn't need. we did not get all the tile we needed, and did not purchase any from ludowici. unfortunately we had to cannabilize original tiles from other areas.

Hill, Christine A

From: danibrewer@yahoo.com
Sent: Thursday, December 29, 2005 2:40 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 29, 2005, 2:39 pm by:

Petitioner name Dani Brewer
Occupation Slate, Tile & Copper Small Business Owner
State of Residence .. OH
Email address danibrewer@yahoo.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Dani Brewer

Hill, Christine A

From: edmslate@yahoo.com
Sent: Thursday, December 29, 2005 2:41 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 29, 2005, 2:41 pm by:

Petitioner name J. Elmer Brewer
Occupation Slate, Tile & Copper Small Business Owner
State of Residence .. OH
Email address edmslate@yahoo.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from J. Elmer Brewer

Hill, Christine A

From: eburro@comcast.net
Sent: Thursday, December 29, 2005 11:44 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 29, 2005, 11:44 am by:

Petitioner name Erik L. Burro
Occupation Homeowner
State of Residence .. NJ
Email address eburro@comcast.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Erik L. Burro

In addition to the esthetic and practical considerations, why should this company have the right to TRASH many older and most often, historically significant buildings? It is not fair to the owners, nor fair to the communities in which they dwell. This is the 21st century and removal of the decree will do nothing more than increase landfills and discourage recycling...a key component of our environmentally aware public policy.

Hill, Christine A

From: tombett@verizon.net
Sent: Wednesday, December 28, 2005 7:44 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 28, 2005, 7:44 pm by:

Petitioner name Tom Leavitt
Occupation Sales
State of Residence .. MA
Email address tombett@verizon.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Tom Leavitt

Ken, You, I and any one else with time in the field selling Ludowici roof tile knows full well that when we could tie trim items into a job we could freeze out manufacturers with less expensive field tiles. I always felt good about that and enjoyed my advantage. The problem, however, comes as you know when doing restoration of historic and other older roofs. These jobs are frequently owned by people or organizations with limited financial resources and if they do not have the opportunity to use salvaged tile and buy trim items they will not be able to afford proper restoration of these roofs and they will be relegated to the trash heap.

Obviously, our forefathers, in 1929 recognized that Ludowici had an obligation to service these markets back then and it seems ludicrous not to see that the need is even greater now. Guaranteed there are many more people out there that share your concern. Tom Leavitt

Hill, Christine A

From: Doug@ReclaimedRoofs.com
Sent: Wednesday, December 28, 2005 6:27 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 28, 2005, 6:26 pm by:

Petitioner name Douglas Cochran
Occupation Roofing Slate and Tile Sales
State of Residence .. DE
Email address Doug@ReclaimedRoofs.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Douglas Cochran

I strongly agree with all the statements above. I have been selling reclaimed Ludowici roof tile for the past ten years. Ludowici has been increasingly more difficult to deal with over that time, according to many of my customers. They have recently sunk to a new low with using exclusionary tactics to bully their customers and distributors into conducting business that goes agains all better judgement.

Doug Cochran
Reclaimed Roofs, Inc.

Hill, Christine A

From: jaycoroofpro@yahoo.com
Sent: Monday, December 26, 2005 10:37 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 26, 2005, 10:36 pm by:

Petitioner name Jason M. Winfrey
Occupation slate & tile roof restoration contractor
State of Residence .. MO
Email address jaycoroofpro@yahoo.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Jason M. Winfrey

please save our jobs and our history!

Hill, Christine A

From: Stevej@lesjonesroofing.com
Sent: Thursday, December 22, 2005 11:07 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 22, 2005, 11:07 am by:

Petitioner name Steve Jones
Occupation Roofing Contractor
State of Residence .. Mn
Email address Stevej@lesjonesroofing.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparent that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Steve Jones

We need to be able to get trim pieces for our tile repair job. They sell a product that last a long time, repair need to be done some times. If pieces are not avialable that would hurt our business.

Hill, Christine A

From: jchan1@prodigy.net
Sent: Thursday, December 22, 2005 9:56 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 22, 2005, 9:55 am by:

Petitioner name John Chan
Occupation business owner
State of Residence .. OH
Email address jchan1@prodigy.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from John Chan

It would be a shame to prevent historical restorations due to this.

Hill, Christine A

From: dkarel@garlock-french.com
Sent: Thursday, December 22, 2005 9:42 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 22, 2005, 9:42 am by:

Petitioner name DAVID J KAREL
Occupation Roofing Contractor
State of Residence .. MN
Email address dkarel@garlock-french.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from DAVID J KAREL

I believe that the The DOJ Anti-trust Division should DENY the motion from Ludowici. They may have a much smaller percentage of the market for new roofing tile sales, however, they have a very large percentage of the existing roofs with tile on them. in areas they are essentially the only clay tile roof material existing. These roofs need to be maintained and preserved. The only source for these matching materials is Ludowici since other manufacturers tile cannot be used with Ludowici's tile systems. These many homeowners, universities, churches and historic building are at the mercy of Ludowici.

Hill, Christine A

From: paulnosak13@aol.com
Sent: Wednesday, December 21, 2005 8:34 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 21, 2005, 8:33 pm by:

Petitioner name paul nosak
Occupation tile and slate contractor
State of Residence .. ok
Email address paulnosak13@aol.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from paul nosak

Hill, Christine A

From: ronstokes@bellsouth.net
Sent: Wednesday, December 21, 2005 3:04 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 21, 2005, 3:03 pm by:

Petitioner name Ronald Stokes
Occupation Roofing Contractor
State of Residence .. GA
Email address ronstokes@bellsouth.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Ronald Stokes

In God's name, what is the true nature of preservation and conservation if not to recycle materials for generations to come?
What kind of world have we come to when we put the almighty dollar before good common sense?

Hill, Christine A

From: stuart@northernrooftiles.com
Sent: Wednesday, December 21, 2005 2:18 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 21, 2005, 2:17 pm by:

Petitioner name Stuart Matthews
Occupation Roof Tile Sales
State of Residence .. NY
Email address stuart@northernrooftiles.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Stuart Matthews

Hill, Christine A

From: jkoverman@historiccharleston.org
Sent: Wednesday, December 21, 2005 11:46 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 21, 2005, 11:45 am by:

Petitioner name Jill Koverman
Occupation Collections Manager
State of Residence .. SC
Email address jkoverman@historiccharleston.org

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

Clay roofing tiles are known for their durability, with service lives reaching and exceeding one hundred years. Every tile rooftop also includes essential "trim" pieces. These high-wear pieces (corners, edges, special coverings) tend to require earlier repair and replacement - yet the trim represents only a fraction of the overall cost and worth of a rooftop. These factors all contribute to the strong market for clay tile salvage and restoration existing today.

By openly refusing to sell essential trim products -without a "field tile" order (large areas of new tile), Ludowici subverts the efficient reuse of high-quality clay tile roofing materials and undermines the business model of a vibrant sector of the restoration industry.

Therefore it is my opinion that the Ludowici Company's refusal to sell trim without a field tile order demonstrates behavior that is consistant with its pre-1929 actions, and violates the terms of the Decree. Removing the Decree would endanger the public's right to free and fair competition in the Clay Tile Roofing Industry.

Additional COMMENT from Jill Koverman

Hill, Christine A

From: robert.raleigh.jr@claytileroof.com
Sent: Tuesday, December 20, 2005 3:57 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 20, 2005, 3:56 pm by:

Petitioner name Robert W. Raleigh Jr.
Occupation Tile & Slate Roofing Contractor
State of Residence .. IL
Email address robert.raleigh.jr@claytileroof.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Robert W. Raleigh Jr.

Ludowici's proposed policy to restrict/eliminate trim tile sales for the line of roof tiles they have produced for over 100 years will severely restrict competition for them because used or salvaged roof tile dealers will not be able to secure the specialty trim tiles they need to fill orders for used tile materials.

Hill, Christine A

From: bloveland@state.pa.us
Sent: Tuesday, December 20, 2005 9:05 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 20, 2005, 9:05 am by:

Petitioner name Barry Loveland
Occupation Architectural Designer/Manager
State of Residence .. PA
Email address bloveland@state.pa.us

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Barry Loveland

We have a number of historic buildings that have clay tile roofs. We often recylce historic clay tile and only need replacements of small quantities of tile such as ridge caps. It is important that we have access to markets for small quantities of replacement tile, recycled tile and custom tile for the restoration of historic structures, some of which are National Historic Landmarks and/or listed on the National Register of Historic Places. I am concerned that Ludowici's selling policies and practices may cause sources of recycled tile to go out of business or require substantially higher than necessary minimum orders from Ludowici and force us to spend unnecessary public funds to replace entire roofs when most of the roof is in good condition and only a few tiles are damaged. Thank you for your consideration.

Hill, Christine A

From: cynthiamertz@lehighcounty.org
Sent: Monday, December 19, 2005 3:54 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 19, 2005, 3:54 pm by:

Petitioner name Cynthia Douglas Mertz
Occupation Administrative Officer
State of Residence .. PA
Email address cynthiamertz@lehighcounty.org

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Cynthia Douglas Mertz

Please do the right thing in regards to historic preservation.

Hill, Christine A

From: geosits@allentowncity.org
Sent: Monday, December 19, 2005 3:30 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 19, 2005, 3:30 pm by:

Petitioner name Cynthia Geosits
Occupation Community Planner
State of Residence .. PA
Email address geosits@allentowncity.org

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Cynthia Geosits

Hill, Christine A

From: clastile@bellsouth.net
Sent: Monday, December 19, 2005 12:34 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 19, 2005, 12:34 pm by:

Petitioner name Steve Yoder
Occupation Tile Distributor
State of Residence .. GA
Email address clastile@bellsouth.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Steve Yoder

Hill, Christine A

From: ftolentino@cegglc.com
Sent: Monday, December 19, 2005 7:43 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 19, 2005, 7:42 am by:

Petitioner name Frank Tolentino
Occupation Archtiectural Designer
State of Residence .. VA
Email address ftolentino@cegglc.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Frank Tolentino

I have dealt with historic roofing in reroofing local buildings going back to the early part of the last century. In order to have competetive bids it is important to keep creative approaches for construction. I agree that the owner/architect and NOT the supplier should determine the accuracy of the preservation.

Hill, Christine A

From: dublintilerroof@aol.com
Sent: Sunday, December 18, 2005 1:28 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 18, 2005, 1:28 pm by:

Petitioner name Stephen Ridge
Occupation Roofer
State of Residence .. TX
Email address dublintilerroof@aol.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Stephen Ridge

Hill, Christine A

From: mike@mortensonroofing.com
Sent: Saturday, December 17, 2005 3:40 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 17, 2005, 3:40 pm by:

Petitioner name Michael Lukis
Occupation Owner/Roofing Contractor
State of Residence .. IL
Email address mike@mortensonroofing.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparent that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Michael Lukis

We recently found out about Ludowici's 1929 Sherman Anti-trust decree and their apparent success in having it removed.

Our company has been purchasing, installing, and repairing Ludowici tile roofs since 1937. We knew something had changed when in the past month they made us purchase 100 pieces of field tile for the ridiculous price of \$2000 on an order where all we needed is approx. \$4000 worth of tile fittings to do a repair on an old Ludowici tile roof. On another order we had to purchase over \$4000 worth of field tile to get the fittings we need to do a repair on another old Ludowici tile roof. Unfortunately they are the only manufacturer of these fittings that we need to do these repairs.

Ludowici has a total monopoly on the clay tile restoration market in our area.

From these recent indications by Ludowici, lifting this decree will have a terrible and significant effect on our business and many other roof repair/restoration businesses.

We are totally against lifting the Sherman anti-trust decree which has been in place, and is still needed to protect companies like ours from the practices they are now using.

Hill, Christine A

From: calvingore@msn.com
Sent: Saturday, December 17, 2005 8:40 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 17, 2005, 8:40 am by:

Petitioner name Calvin Gore
Occupation Tile Roofing Sales
State of Residence .. TX
Email address calvingore@msn.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Calvin Gore

This is kind of like a car manufacturer who bulds cars but does not provide parts to repair them in the future, you just have to buy a new car!

Hill, Christine A

From: kmcgee@gwi.net
Sent: Friday, December 16, 2005 5:39 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 16, 2005, 5:39 pm by:

Petitioner name Kathleen McGee
Occupation Tax Reform Campaign Director
State of Residence .. Me
Email address kmcgee@gwi.net

PETITION

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Additional COMMENT from Kathleen McGee

Consumers have the right to choose where they secure the materials they need. Competition is essential in any business, a precept that has been subverted over the years by large corporate concerns.

Small business is the backbone of the American economy. With these huge corporations dictating the means by which any trade may operate, small business and consumers suffer unduly.

Hill, Christine A

From: jhobson@h2l2.com
Sent: Friday, December 16, 2005 12:34 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 16, 2005, 12:33 pm by:

Petitioner name James P. Hobson RA CSI CCS
Occupation Architect and Specifier
State of Residence .. PA
Email address jhobson@h2l2.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from James P. Hobson RA CSI CCS

I am particularly concerned about any interference by Ludowici with the used tile market. This action is in conflict with many attempts to provide "green" sustainable building material through recycling of usable building material. This recycling is to be encouraged - not discouraged by unfair trade practice. I also oppose any attempt by a manufacturer to link purchase of one type of material [trim] to purchase of another type of material [field tile] I petition either that the original antitrust action be retained or that, now that there are more roof tile companies, a new set of conditions be imposed restrictng Ludowici regarding minimum orders and interfering with recycling efforts.

Hill, Christine A

From: tombett@verizon.net
Sent: Friday, December 16, 2005 10:41 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 16, 2005, 10:40 am by:

Petitioner name Thomas F. Leavitt
Occupation Sales
State of Residence .. MA
Email address tombett@verizon.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Thomas F. Leavitt

Hill, Christine A

From: PRAJOEY@AOL.COM
Sent: Friday, December 16, 2005 9:19 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 16, 2005, 9:19 am by:

Petitioner name JOEY MESSINA
Occupation ROOFER
State of Residence .. LA
Email address PRAJOEY@AOL.COM

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from JOEY MESSINA

Hill, Christine A

From: hlforbes@juno.com
Sent: Friday, December 16, 2005 9:10 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 16, 2005, 9:10 am by:

Petitioner name Harry Lee Forbes
Occupation Historic Roofing Contractor
State of Residence .. WV
Email address hlforbes@juno.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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By openly refusing to sell essential trim products -without a "field tile" order (large areas of new tile), Ludowici subverts the efficient reuse of high-quality clay tile roofing materials and undermines the business model of a vibrant sector of the restoration industry.

Therefore it is my opinion that the Ludowici Company's refusal to sell trim without a field tile order demonstrates behavior that is consistant with its pre-1929 earlier actions, and violates the terms of the Decree. Removing the Decree would endanger the public's right to free and fair competition in the Clay Tile Roofing Industry.

Additional COMMENT from Harry Lee Forbes

We have worked hard over the last 25 years to preserve the beauty and integrity of the historic roof systems in the eastern US. Many of the tiles produced 50+ years ago cannot be perfectly matched today due to regulations on the lead industry and for other reasons. Requiring the use of new field tiles in restoration and repair would strongly hamper and degrade the quality of our industry.

Hill, Christine A

From: dtreuter@alumni.utexas.net
Sent: Thursday, December 15, 2005 4:37 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 15, 2005, 4:37 pm by:

Petitioner name Douglas A. Treuter
Occupation Architectural Sales Representative
State of Residence .. TX
Email address dtreuter@alumni.utexas.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Douglas A. Treuter

Ludowici Roof Tile continues to dominate the overall clay tile market of the North, Midwest and East as well as the public, institutional and commercial markets in most states east of the Rocky Mountains. Ludowici continues to violate numerous behaviors noted in the original decree such as selectively terminating distributors that offer competitive and salvaged products. In addition, Ludowici and its agents employ subversive tactics to exclude distributors from Ludowici transactions. The policy of not providing trim items necessary for restoration projects on which the owner is also using salvaged products does a great disservice to their customers of the past and present. This policy can result in substantially increased costs and possibly additional delays to building owners as well as further disrupting Ludowici's potential to efficiently produce "current" products. These actions and this policy are clearly efforts on the part of Ludowici to restrict competition.

Hill, Christine A

From: rtscdoug@aol.com
Sent: Thursday, December 15, 2005 2:27 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 15, 2005, 2:26 pm by:

Petitioner name doug straubmueller
Occupation president, the roof tile and slate company
State of Residence .. tx
Email address rtscdoug@aol.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from doug straubmueller

We have been a distributor for Ludowici Clay Tile for over 10 years. Ludowici has the majority of the clay roof tile market in the areas of the country that have freeze thaw conditions. They also produced of most clay tiles used on historical buildings during the last century. They have taken a stance of not taking any orders for trim tiles (unless the order is placed with the regular field tiles), which are needed when restoring old buildings. It would be like a major automotive manufacturer refusing to sell parts unless you buy the whole car. They have recently told my company that we are no longer allowed to order from them because we sell reclaimed Ludowici roof tiles and clay tiles from competing manufacturers. We have a good payment history with Ludowici, and sell various products like all roofing supply companies do. I feel that they are unfairly refusing to sell to our company. They have a monopoly in the above mentioned areas and are refusing to sell product!
s to vari

Hill, Christine A

From: station4@elmirafiremuseum.org
Sent: Thursday, December 15, 2005 11:58 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 15, 2005, 11:57 am by:

Petitioner name Jeffrey C Burger
Occupation President - The Historic 1897 Firehouse
State of Residence .. NY
Email address station4@elmirafiremuseum.org

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Jeffrey C Burger

This would be a disaster for those of us with existing clay tile roofs that only need repair pieces. Why replace a good roof just because trim pieces can not be obtained? Thnak you for your careful consideration of this important issue.

Hill, Christine A

From: Rtscdow@aol.com
Sent: Thursday, December 15, 2005 11:12 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 15, 2005, 11:11 am by:

Petitioner name Dow Staubmueller
Occupation Sales
State of Residence .. TX
Email address Rtscdow@aol.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Dow Staubmueller

East of the Rockies Ludowici owns approximately 80-90% of the market because they are one of the only ones in the clay tile market that sells in freeze-thaw conditions. Of the 5 or 6 companies that Ludowici list as competition east of the Rockies only one will compete throughout the countries and they do not actively pursue jobs east of the Rockies.

Hill, Christine A

From: vervo@aol.com
Sent: Tuesday, December 13, 2005 1:01 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 13, 2005, 1:00 pm by:

Petitioner name David Alvarez
Occupation Sheet Metal and Roofing Manager
State of Residence .. TX
Email address vervo@aol.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from David Alvarez

Hill, Christine A

From: jaycosm@sbcglobal.net
Sent: Tuesday, December 13, 2005 10:53 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 13, 2005, 10:52 am by:

Petitioner name Jay Erlandson
Occupation Jay-Co Sheet Metal and Roofing, Inc.
State of Residence .. TX
Email address jaycosm@sbcglobal.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Jay Erlandson

We opose Ludowici's sales tactics regarding the aforementioned materials and therefore will join this petition for the cause.

Hill, Christine A

From: montie.brown@insightbb.com
Sent: Tuesday, December 13, 2005 10:08 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 13, 2005, 10:08 am by:

Petitioner name Montie G Brown
Occupation General Contractor
State of Residence .. KY
Email address montie.brown@insightbb.com

PETITION

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Additional COMMENT from Montie G Brown

Hill, Christine A

From: john_pack@sbcglobal.net
Sent: Tuesday, December 13, 2005 9:36 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 13, 2005, 9:36 am by:

Petitioner name John Pack
Occupation Roofing and Sheet Metal Contractor
State of Residence .. TX
Email address john_pack@sbcglobal.net

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from John Pack

Have you heard of the term "racketeering?" This is a great example. Enforce the decree!

Hill, Christine A

From: chan@cornettroofing.com
Sent: Tuesday, December 13, 2005 8:46 AM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 13, 2005, 8:46 am by:

Petitioner name Richard Cornett
Occupation Contractor
State of Residence .. in
Email address chan@cornettroofing.com

PETITION

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Additional COMMENT from Richard Cornett

Hill, Christine A

From: chinte@nyc.rr.com
Sent: Monday, December 12, 2005 10:41 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 12, 2005, 10:40 pm by:

Petitioner name L Kligman
Occupation roofing repair
State of Residence .. NY
Email address chinte@nyc.rr.com

PETITION

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Additional COMMENT from L Kligman

I agree, the monopoly must be lifted to permit other companies to sell used or restored tiles that the equivalent or equal to the original Ludowici tiles...particularly if you are a small business and need to repair rather than install entire roofs.

Hill, Christine A

From: geopanda1@yahoo.com
Sent: Monday, December 12, 2005 10:39 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 12, 2005, 10:39 pm by:

Petitioner name L Kelly
Occupation roofing
State of Residence .. NY
Email address geopanda1@yahoo.com

PETITION

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Additional COMMENT from L Kelly

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Hill, Christine A

From: jana@claytile.com
Sent: Monday, December 12, 2005 3:44 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 12, 2005, 3:44 pm by:

Petitioner name Jana Kay
Occupation Clay Roof Tile Sales
State of Residence .. TX
Email address jana@claytile.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Jana Kay

We were visited by the Vice President of Ludowici Sales (Tab Colbert) last week and told that because we carry competing products, Ludowici no longer is going to allow us to sell their tile. Not too long ago, we were also told that we could no longer place trim orders to supply along with our historical field tile jobs. This will greatly affect our business as we supply antique tiles for repair jobs in storm ravaged areas. If we can no longer order needed trim pieces, how are we supposed to help our customers? Ludowici has gone behind our backs on several orders and tried to get our customers to place orders directly through their area rep. In order to get Ludowici pricing, we are forced to give our customer information. Ludowici then, in turn, contacts our customer and offers them the opportunity to buy direct at a cheaper cost. Ludowici has not changed their approach to the clay tile business. They still lie and cheat in order to sell jobs.

Hill, Christine A

From: tmcassin@hotmail.com
Sent: Monday, December 12, 2005 2:41 PM
To: Hill, Christine A
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 12, 2005, 2:41 pm by:

Petitioner name tom cassin
Occupation roofing contractor
State of Residence .. tx
Email address tmcassin@hotmail.com

PETITION

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Therefore it is my opinion that the Ludowici Company's refusal to sell trim without a field tile order demonstrates behavior that is consistant with its pre-1929 actions, and violates the terms of the Decree. Removing the Decree would endanger the public's right to free and fair competition in the Clay Tile Roofing Industry.

Additional COMMENT from tom cassin

Hill, Christine A

From: RfgTile@aol.com
Sent: Monday, December 12, 2005 9:56 AM
To: Hill, Christine A
Subject: The Ludowici Roof Tile Company



tmp.htm

Dear Ms. Hill: Within days of the notice of the lifting of the decree, Ludowici, for the first time refused to sell trim to our company. Their representative informed me that they would no longer accept trim orders without an appropriate field tile purchase. This is now happening all over the country. We have known for some time by their public statements that they intended to do this in order to eliminate the used tile market. Doesn't this put them in violation of the Decree as of this moment? It seems that they couldn't wait until the elimination of the Decree was final.

Interesting note: I may be the only person alive today that knew one of the principals of the original Ludowici-Celadon Company, Dr. R.E. Sturtevant. As a teen age boy I met him several times when my father (Charles L. McGee) was Sales Manager of the company. Dad went on to become the CEO in the late 1940-1950's.

Ken McGee, President
The Tile Man, Inc.

Hill, Christine A

From: ccannon@cannonroofing.com
Sent: Monday, December 12, 2005 6:17 AM
To: Hill, Christine A; ranv05@verizon.net
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 12, 2005, 6:16 am by:

Petitioner name Chris Cannon
Occupation Roofing Contractor
State of Residence .. SC
Email address ccannon@cannonroofing.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Chris Cannon

I believe this will impose extreme additional costs to Owners who would prefer to "renovate" their existing roof in lieu of replacing it. It truly removed their right if replacement parts are not available.

Hill, Christine A

From: boonejan@hubserv.com
Sent: Sunday, December 11, 2005 2:54 PM
To: Hill, Christine A; ranv05@verizon.net
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 11, 2005, 2:53 pm by:

Petitioner name Janice Boone
Occupation Small business owner
State of Residence .. MS
Email address boonejan@hubserv.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Janice Boone

Ludowici should be confronted at their refusal to sell trim without a field tile order. They should not be allowed to exercise their monopoly and therefore take advantage of customers especially at a time of reconstruction after Hurrricane Katrina.

Hill, Christine A

From: pewful@aol.com
Sent: Sunday, December 11, 2005 2:30 PM
To: Hill, Christine A; ranv05@verizon.net
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 11, 2005, 2:29 pm by:

Petitioner name Jennifer Blickensderfer
Occupation Secretary
State of Residence .. NC
Email address pewful@aol.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Jennifer Blickensderfer

We need to be able to purchase vintage or used tile to match an existing roof or many of our customers and many of America's most beautiful homes may lose their tile roofs. Thank you.

Hill, Christine A

From: sallen1279@hotmail.com
Sent: Sunday, December 11, 2005 2:21 PM
To: Hill, Christine A; ranv05@verizon.net
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 11, 2005, 2:21 pm by:

Petitioner name Sandy Allen
Occupation retired
State of Residence .. TN
Email address sallen1279@hotmail.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Sandy Allen

Hill, Christine A

From: gtreuter@austin.rr.com
Sent: Sunday, December 11, 2005 2:19 PM
To: Hill, Christine A; ranv05@verizon.net
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 11, 2005, 2:19 pm by:

Petitioner name Gina L. Treuter
Occupation Housewife
State of Residence .. TX
Email address gtreuter@austin.rr.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Gina L. Treuter

I believe Ludowici/Celadon is currently in violation of the 1929 terms of Decree. My husband has had business dealings with this company for many years. Their employees have made numerous false accusations to local individuals in the industry in an effort to defame the reputations of my husband and the company he works for. I firmly believe this to be an effort on the part of Ludiwici/Celadon to fetter, coerce and manipulate trade practices.

Hill, Christine A

From: entpseroofing@aol.com
Sent: Sunday, December 11, 2005 2:12 PM
To: Hill, Christine A; ranv05@verizon.net
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 11, 2005, 2:11 pm by:

Petitioner name Tyrone Robinson
Occupation Contractor
State of Residence .. TN
Email address entpseroofing@aol.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, coreerce and manipulate trade practices.

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Additional COMMENT from Tyrone Robinson

Hill, Christine A

From: susan@iversonindustries.com
Sent: Sunday, December 11, 2005 1:53 PM
To: Hill, Christine A; ranv05@verizon.net
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 11, 2005, 1:53 pm by:

Petitioner name Susan Iverson
Occupation Homemaker
State of Residence .. MI
Email address susan@iversonindustries.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

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Additional COMMENT from Susan Iverson

Hill, Christine A

From: bill@iversonindustries.com
Sent: Sunday, December 11, 2005 1:51 PM
To: Hill, Christine A; ranv05@verizon.net
Subject: Comment on Civil Action No. 05-C-6134

The following petition submitted December 11, 2005, 1:50 pm by:

Petitioner name William Iverson
Occupation Business Owner
State of Residence .. MI
Email address bill@iversonindustries.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, coreerce and manipulate trade practices.

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Additional COMMENT from William Iverson

Hill, Christine A

From: ranv05@verizon.net
Sent: Sunday, December 11, 2005 12:49 PM
To: Hill, Christine A
Subject: [Fwd: Comment on Civil Action No. 05-C-6134]

Last forwarded petition
thanks
Randy Vlahos

----- Original Message -----
Subject: Comment on Civil Action No. 05-C-6134
Date: Sun, 11 Dec 2005 08:33:39 -0500
From: leaktraker@mchsi.com
Reply-To: leaktraker@mchsi.com
To: ranv05@verizon.net

The following petition submitted December 11, 2005, 8:33 am by:

Petitioner name Steven C. Rulli
Occupation Roof Contractor
State of Residence .. NC
Email address leaktraker@mchsi.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Steven C. Rulli

I rarely need a whole roof worth of tiles as I mainly do repair work. I like Ludowici's product and need them often

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No virus found in this incoming message.
Checked by AVG Free Edition.
Version: 7.1.371 / Virus Database: 267.13.13/197 - Release Date: 12/9/2005

Hill, Christine A

From: ranv05@verizon.net
Sent: Sunday, December 11, 2005 12:49 PM
To: Hill, Christine A
Subject: [Fwd: Comment on Civil Action No. 05-C-6134]

... one more petitioner:
Randy Vlahos

----- Original Message -----
Subject: Comment on Civil Action No. 05-C-6134
Date: Sun, 11 Dec 2005 09:09:46 -0500
From: pipt80@aol.com
Reply-To: pipt80@aol.com
To: ranv05@verizon.net

The following petition submitted December 11, 2005, 9:09 am by:

Petitioner name John Pippenger
Occupation Fire fighter
State of Residence .. tn
Email address pipt80@aol.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from John Pippenger

Hill, Christine A

From: ranv05@verizon.net
Sent: Sunday, December 11, 2005 12:47 PM
To: Hill, Christine A
Subject: [Fwd: Comment on Civil Action No. 05-C-6134]

Another petitioner...

Thanks
Randy Vlahos

----- Original Message -----
Subject: Comment on Civil Action No. 05-C-6134
Date: Sun, 11 Dec 2005 10:25:57 -0500
From: TheBlickCo@aol.com
Reply-To: TheBlickCo@aol.com
To: ranv05@verizon.net

The following petition submitted December 11, 2005, 10:25 am by:

Petitioner name James M. Blickensderfer
Occupation General Manager/The Blickensderfer Company
State of Residence .. NC
Email address TheBlickCo@aol.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from James M. Blickensderfer

We feel very strongly about this issue as restoration of historic homes and buildings is our main source of business.

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Version: 7.1.371 / Virus Database: 267.13.13/197 - Release Date: 12/9/2005

Hill, Christine A

From: ranv05@verizon.net
Sent: Sunday, December 11, 2005 12:45 PM
To: Hill, Christine A
Subject: [Fwd: Comment on Civil Action No. 05-C-6134]

Dear Ms. Hill,

As I mentioned in previous email, I have building a website to enable interested members of the clay tile roofing & restoration industry to endorse a "Petition" - and submit their comments at the bottom, if desired.

This was finished and approved, however I erred by sending out a few notices before having "pointed" the form at your mailbox, resulting in the first (4) responses coming to me. I will forward these right away - the first below.

Email is used only to spread the word, the petition itself is contained on a web page (form) here:
<http://www.committeetopreserveamericashistoricroofingtile.org/>

We welcome your comments and/or suggestions!

Thank you
Randy Vlahos,
(web designer for)
The Committee to Preserve America's Clay Roofing Tile

----- Original Message -----
Subject: Comment on Civil Action No. 05-C-6134
Date: Sun, 11 Dec 2005 10:42:58 -0500
From: alva2303@aol.com
Reply-To: alva2303@aol.com
To: ranv05@verizon.net

The following petition submitted December 11, 2005, 10:42 am by:

Petitioner name Fred Alvarado
Occupation Sales
State of Residence .. Tx
Email address alva2303@aol.com

PETITION

I, the undersigned, do hereby petition the Department of Justice to reconsider its tentative decision to lift the anti-trust action (Decree of 1929) against Ludowici-Celadon (Ludowici), for the following reasons:

While it is true that the clay tile industry has become more competitive, and that the overall size and scope of Ludowici's market position has diminished; it is also apparant that where the opportunity exists - Ludowici will act to fetter competition and manipulate trade. In specific markets, sub-markets or niches, Ludowici today continues to dominate in terms of market-share, sales penetration, and positioning (e.g. US Midwest and Northeast clay tile rooftops). In these markets the company continues to use its dominance to restrict, corerce and manipulate trade practices.

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Additional COMMENT from Fred Alvarado

Stop unfair trade practice

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Checked by AVG Free Edition.
Version: 7.1.371 / Virus Database: 267.13.13/197 - Release Date: 12/9/2005