UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

in the Matter of)
POLYGRAM HOLDING, INC.,)
a corporation,)
DECCA MUSIC GROUP LIMITED, a corporation,)
UMG RECORDINGS, INC.,) Docket No. 9298)
a corporation,)
and)
UNIVERSAL MUSIC & VIDEO)
DISTRIBUTION CORP.,)

<u>COMPLAINT COUNSEL'S UNOPPOSED MOTION FOR</u> EXTENSION TO FILE RESPONSE TO RESPONDENTS' MOTION TO COMPEL

Complaint counsel moves pursuant to Federal Trade Commission's Rules of Practice §3.22(d) to extend the time by which complaint counsel must file its response to Respondents' Motion to Compel Production of Documents by ten (10) days. Counsel for the parties have conferred on this matter and Respondents' counsel is not opposed to this extension. Currently, this response is due on Tuesday, January 22, 2002. Under the proposed revised schedule satisfactory to both parties, the response would be due on Friday, February 1, 2002.

This extension is necessary because complaint counsel is presently concentrating its efforts upon other time-sensitive obligations, including the preparation of exhibit lists, witness

tists, and deposition designations. In addition, complaint counsel is in the process of preparing a Response to Respondents' Motion for Summary Judgment, which was filed on January 11, 2002.

Accordingly, complaint counsel respectfully requests that the Court grant this extension of time.

Respectfully submitted,

Geoffrey M. Green

John Roberti

Melissa Westman-Cherry

Complaint Counsel

Dated: January 18, 2002

UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

	_
In the Matter of)
POLYGRAM HOLDING, INC., a corporation,)
DECCA MUSIC GROUP LIMITED, a corporation,)))) Docket No. 9298
UMG RECORDINGS, INC., a corporation,)
and)
UNIVERSAL MUSIC & VIDEO DISTRIBUTION CORP.,	
a corporation.	<u>)</u>
	ORDER
	plaint counsel, and for good cause shown, IT IS
•	ich complaint counsel must file a response to
Respondents' Motion to Compel will be ext	ended through Finday, February 1, 2002.
ORDERED:	
	James P. Timony Chief Administrative Law Judge
Dated:	

CERTIFICATE OF SERVICE

I, Melissa Westman-Cherry, hereby certify that on January 18, 2002, I caused a copy of Unopposed Motion for Extension of Time to File Response to Motion to Compel to be served upon the persons listed below by facsimile and by U. S. Mail:

Glenn D. Pomerantz
Bradley S. Phillips
Stephen E. Morrisey
Munger Tolles & Olson LLP
355 South Grand Avenue
35th Floor
Los Angeles, Ca. 90071
Fax: (213) 687-3702
Counsel for Respondents

I, Melissa Westman-Cherry, hereby certify that on January 18, 2002, I caused a copy of Unopposed Motion for Extension of Time to File Response to Motion to Compel to be served upon the person listed below by hand:

The Honorable James P. Timony Chief Administrative Law Judge The Federal Trade Commission 600 Pennsylvania Avenue, N.W. Washington, DC 20580

Melissa Westman-Cherry