

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

DOCKET NO. 9305

UNION OIL COMPANY OF CALIFORNIA,
a corporation.

**JOINT MOTION FOR ENTRY OF STIPULATION FOR MODIFICATION OF SUBPOENA DUCES
TECUM SERVED ON THE PBN COMPANY AND FOR AN EXTENSION OF TIME TO RESPOND**

Complaint Counsel and subpoenaed non-party The PBN Company ("PBN") agree to and request that the enclosed stipulation be entered in this matter. The stipulation is intended primarily to clarify the scope of the subpoena duces tecum served on PBN, attached hereto at Tab A, and also to grant PBN an extension of time to respond, due in large part to the travel schedule of the individual at PBN who is most knowledgeable about the responsive documents. Respondent Unocal does not oppose this motion.

The stipulation is enclosed.

Dated: March 26, 2003

Respectfully submitted,

By /s/ J. Robert Robertson

By /s/ Diane L. Simerson

J. Robert Robertson
Chong S. Park
John Roberti
Lisa Fialco
Counsel Supporting the Complaint
Bureau of Competition
Federal Trade Commission
Washington, D.C. 20580

Diane L. Simerson
ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, Minnesota 55402-2015
Phone: (612) 349-8500
Fax: (612) 339-4181
ATTORNEYS FOR THE PBN COMPANY

Phone: (202) 326-2372; Fax: (202) 326-3496