

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

_____)	
In the Matter of)	
)	
UNION OIL COMPANY OF CALIFORNIA,)	Docket No. 9305
a corporation,)	
)	
_____)	

**COMPLAINT COUNSEL’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE RESPONSE TO: (1) RESPONDENTS’ MOTION FOR
DISMISSAL OF THE COMPLAINT FOR FAILURE TO MAKE SUFFICIENT
ALLEGATIONS THAT RESPONDENT POSSESSES OR DANGEROUSLY THREATENS
TO POSSESS MONOPOLY POWER, AND (2) RESPONDENTS’ MOTION FOR
DISMISSAL OF THE COMPLAINT BASED UPON IMMUNITY UNDER NOERR-
PENNINGTON**

Complaint counsel moves pursuant to Federal Trade Commission’s Rules of Practice §3.22(d) to extend by ten (10) days the time by which complaint counsel must file its responses to: (1) Respondents’ Motion for Dismissal of the Complaint for Failure to Make Sufficient Allegations that Respondent Possesses or Dangerously Threatens to Possess Monopoly Power, and (2) Respondents’ Motion for Dismissal of the Complaint Based Upon Immunity under Noerr-Pennington. Counsel for the parties have conferred on this matter and Respondents’ counsel has consented to this extension. Currently, these responses are due on Thursday, April 10, 2003. Under the proposed revised schedule satisfactory to both parties, the responses would be due on Monday, April 21, 2003.

This extension is necessary because the lead counsel for the complaint counsel has family obligations relating to the care of a sick family member. In addition, complaint counsel staff have professional obligations involving the annual American Bar Association’s Antitrust Conference held in Washington D.C. for which staff members have previously arranged commitments and requirements.

Accordingly, complaint counsel respectfully requests that the Court grant this extension of time.
A proposed order is attached.

Respectfully submitted,

J. Robert Robertson
Chong S. Park
John Roberti

Complaint Counsel

Dated: April 2, 2002

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[PROPOSED] ORDER

Upon the unopposed motion of complaint counsel, and for good cause shown, **IT IS HEREBY ORDERED** that, the date by which complaint counsel must file responses to: (1) Respondents' Motion for Dismissal of the Complaint for Failure to Make Sufficient Allegations that Respondent Possesses or Dangerously Threatens to Possess Monopoly Power, and (2) Respondents' Motion for Dismissal of the Complaint Based Upon Immunity under Noerr-Pennington will be extended through Monday, April 21, 2003.

ORDERED:

D. Michael Chappell
Chief Administrative Law Judge

Dated:

CERTIFICATE OF SERVICE

I, Elizabeth J. Grimm, hereby certify that on April 2, 2003, 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:

VIA FACSIMILE AND FEDERAL EXPRESS

David W. Beehler, Esq.
Robins, Kaplan, Miller & Ciresi, LLP
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800 LaSalle Avenue
Minneapolis, Minnesota 55402-2015

Joseph Kattan, Esq.
Gibson, Dunn, & Crutcher, LLP
1050 Connecticut Avenue, NW
Washington, DC 20036-5306

I, Elizabeth J. Grimm, hereby certify that on April 2, 2003, 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 D. Michael Chappell
Chief Administrative Law Judge
The Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, DC 20580

Elizabeth J. Grimm