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UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION  
WASHINGTON D.C.

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

Docket No. 9305

**SECOND DECLARATION OF C.O. STRATHMAN (IN SUPPORT OF RESPONDENT UNOCAL’S UNOPPOSED MOTION TO REQUEST IN CAMERA STATUS FOR TWO ADDITIONAL DOCUMENTS)**

I, CHARLES O. STRATHMAN, declare as follows:

1. I am the former Vice President, Law, of Respondent Union Oil Company of California (“Unocal”), and I am currently employed by Unocal as Contract Counsel.
2. I submit this declaration in support of Respondent Unocal’s unopposed motion to request in camera status for two additional documents. I am familiar with the documents attached as CX 1800 and CX 1802.
3. Given Unocal’s substantial interest in protecting the confidentiality of these documents, which contain confidential licensing and other commercially sensitive information, I am available to appear at a hearing to address any questions that the court may have relating to the contents of these documents.
4. Both documents contain highly-sensitive, non-public information regarding patent licensing and confidential communications for the purpose of licensing Unocal’s patented technology and/or [REDACTED]

5. These documents contain extremely sensitive commercial and financial information pertaining to licensing. Due to the sensitive nature of the information in these license proposals, disclosure of any type has been extremely limited. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. Unocal takes extensive measures to protect the confidentiality of all of their patent license proposals. Since Unocal intends to license this technology throughout the life of its relevant patents, the contents of these documents will remain sensitive for quite some time. The last patent covered by these agreements expires in 2014.

6. These documents also include [REDACTED]

[REDACTED]. Great measures have been taken to protect the confidentiality of the information contained in these documents, as well as the documents themselves. Maintaining the competitive sensitivity and the value of such information is material to Unocal's future success in its licensing efforts. The disclosure of such information would reveal to competitors Unocal's negotiating and marketing strategies with regard to licensing and afford competitors an unfair business advantage. Disclosure of [REDACTED] would prejudice Unocal and would jeopardize [REDACTED] with the refiners. Unocal never consented to the publication of these communications either in connection with this proceeding or

elsewhere. To the extent that any of these documents have been disclosed to third parties, Unocal has first secured promises of confidentiality.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 29th day of October, 2004.

Signature on File with Commission  
CHARLES O. STRATHMAN

**CX 1800**

**REDACTED**

**REDACTED**

**REDACTED**

**REDACTED**



**CX 1802**

**REDACTED**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 1, 2004, I caused the original and two paper copies to be delivered for filing via Hand Delivery, and caused an electronic copy to be delivered for filing via e-mail of the **PUBLIC** version of the Second Declaration of C.O. Strathman (In Support of Respondent Unocal's Unopposed Motion for *In Camera* Status for Two Additional Documents) to:

Donald S. Clark, Secretary  
Federal Trade Commission  
600 Pennsylvania Ave. NW, Rm. H-159  
Washington, DC 20580  
E-mail: secretary@ftc.gov

I hereby certify that on November 1, 2004, I also caused two paper copies of the Second Declaration of C.O. Strathman (In Support of Respondent Unocal's Unopposed Motion for *In Camera* Status for Two Additional Documents) to be delivered via Hand Delivery to:

The Honorable D. Michael Chappell  
Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Ave. NW  
Washington, DC 20580

I hereby certify that on November 1, 2004, I also caused one paper copy of the Second Declaration of C.O. Strathman (In Support of Respondent Unocal's Unopposed Motion for *In Camera* Status for Two Additional Documents) to be served upon each person listed below via hand delivery:

J. Robert Robertson, Esq.  
Bureau of Competition  
Federal Trade Commission  
601 New Jersey Avenue NW, Drop 6264  
Washington, DC 20001

Geoffrey Oliver, Esq.  
through Chong S. Park, Esq.  
Bureau of Competition  
Federal Trade Commission  
601 New Jersey Avenue NW, Drop 6264  
Washington, DC 20001

*Signature on File with the Commission*

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Bethany D. Krueger