

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

**RESPONDENT UNOCAL OIL COMPANY OF CALIFORNIA'S
OBJECTIONS TO THE SUBPOENA DUCES TECUM SERVED
ON MARK PETERSON**

A. SPECIFICATIONS

1. All documents, other than news articles or other publicly available materials, relating to the Unocal Patents. The term "Unocal Patents" means any patent, patent application, continuation application or divisional application relating to reformulated gasoline. This term specifically includes, but is not limited to, United States Patent Nos. (a) 5,288,393; (b) 5,593,567; (c) 5,653,866; (d) 5,837,126; and (e) 6, 030,521.

RESPONSE: Unocal objects to this request to the extent that it seeks documents protected by the attorney-client privilege and attorney work product doctrine. Unocal shall withhold any and all privileged and otherwise protected documents from Mark Peterson's production and shall provide a privilege log identifying such documents pursuant to Rule of Practice § 3.38A.

2. All documents, other than news articles or other publicly available materials, relating to the disclosure or licensing of Unocal intellectual property.

RESPONSE: Unocal objects to this request to the extent that it seeks documents protected by the attorney-client privilege and attorney work product doctrine. Unocal shall withhold any and all privileged and otherwise protected documents from Mark Peterson's production and shall provide a privilege log identifying such documents pursuant to Rule of Practice § 3.38A.

3. All documents relating to any communication between you and Unocal, other than communications relating to your own employee benefits, pension, deferred compensation or other human resources materials.

RESPONSE: Unocal objects to this request to the extent that it seeks documents protected by the attorney-client privilege and attorney work product doctrine. Unocal shall withhold any and all privileged and otherwise protected documents from Mark Peterson's production and shall provide a privilege log identifying such documents pursuant to Rule of Practice § 3.38A.

4. All calendars, business diaries, or schedule books maintained or kept during your employment with Unocal.

RESPONSE: Unocal objects to this request to the extent that it seeks documents protected by the attorney-client privilege and attorney work product doctrine. Unocal shall withhold any and all privileged and otherwise protected documents from Mark Peterson's production and shall provide a privilege log identifying such documents pursuant to Rule of Practice § 3.38A.

Dated: April 18, 2003.

Respectfully submitted,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

Original Signature on File with Commission

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