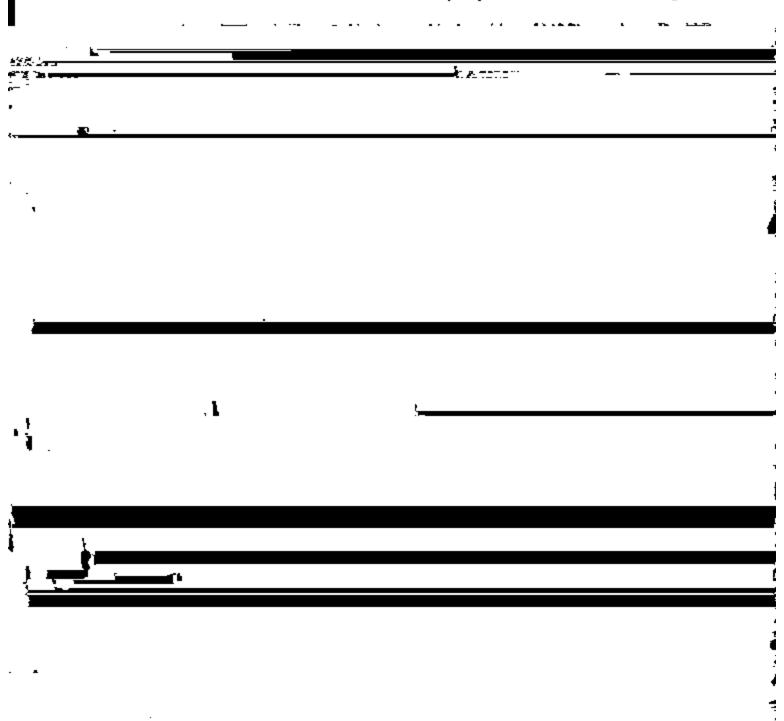
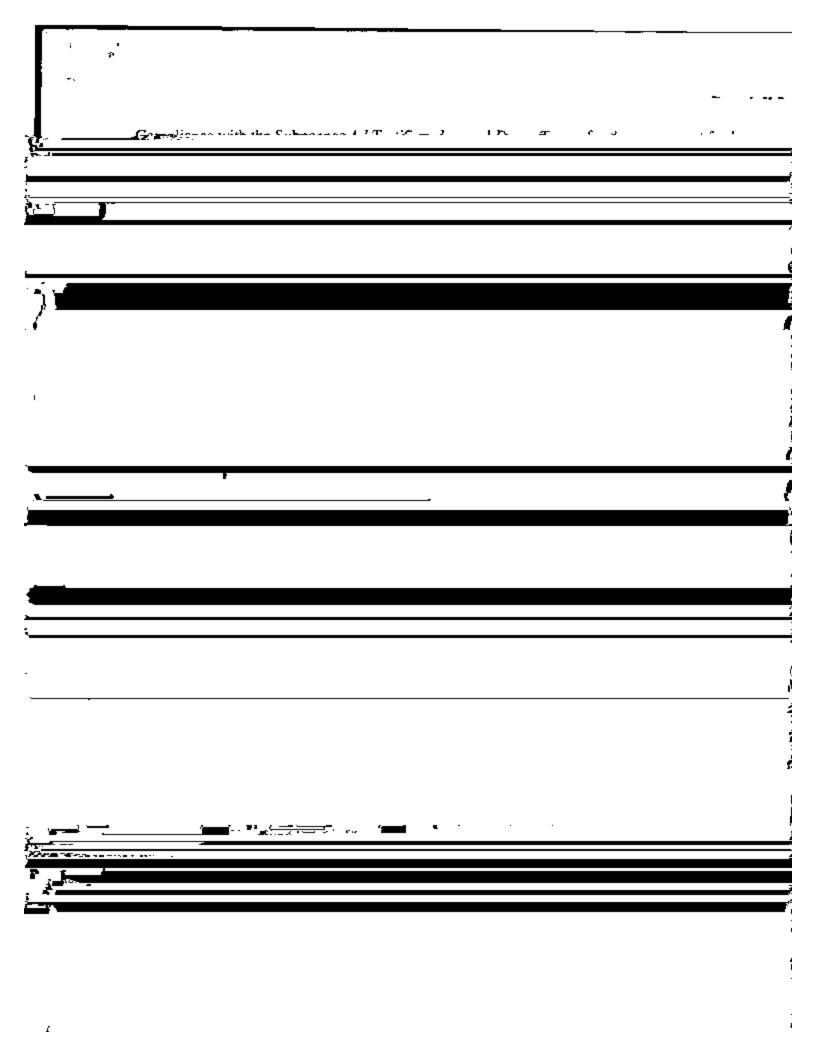


so far has consisted of only roughly half a box of materials, containing MSC press releases, analysts' reports about MSC, four North American price books, and a collection of pricing analysis presentations.

The threadbare character of MSC's discovery responses, both in the current litigation and

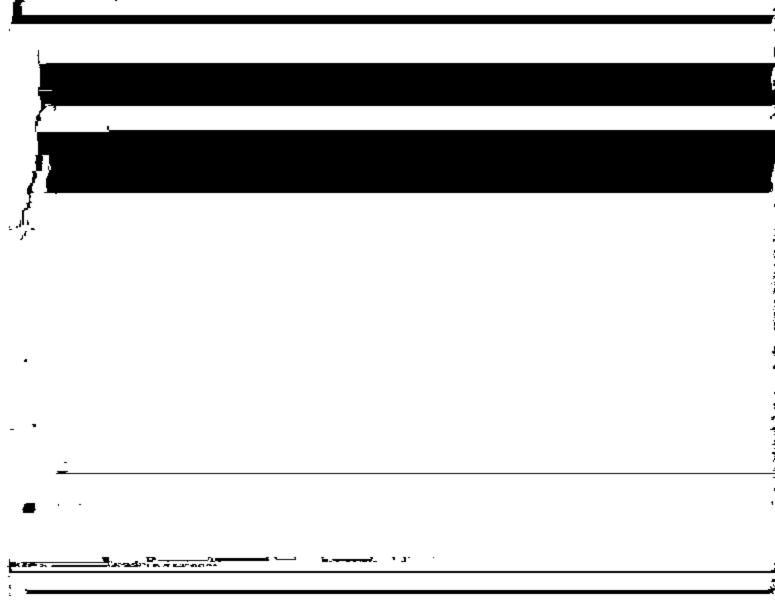




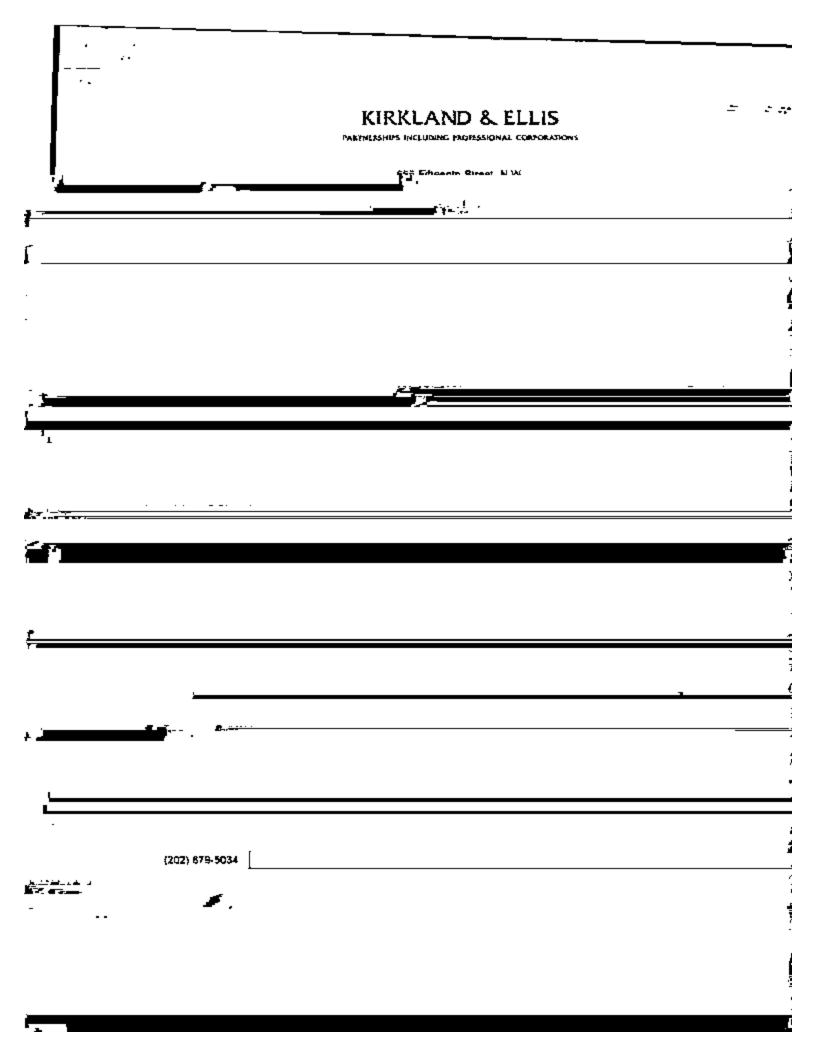
### CERTIFICATE OF SERVICE

This is to certify that on January 10, 2002, I caused a copy of the Supplement to

Complaint Council's Motion to Compai Compliance With Submonnes Ad Testificandons and

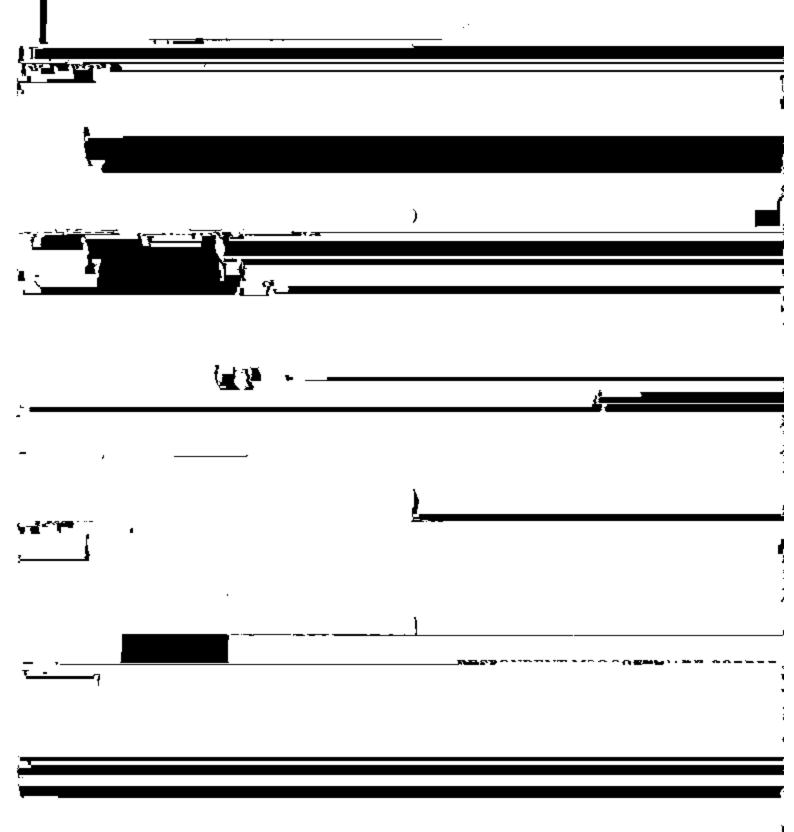


## Exhibit A



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		D. L.M. 14 D		
		Exhibit B		

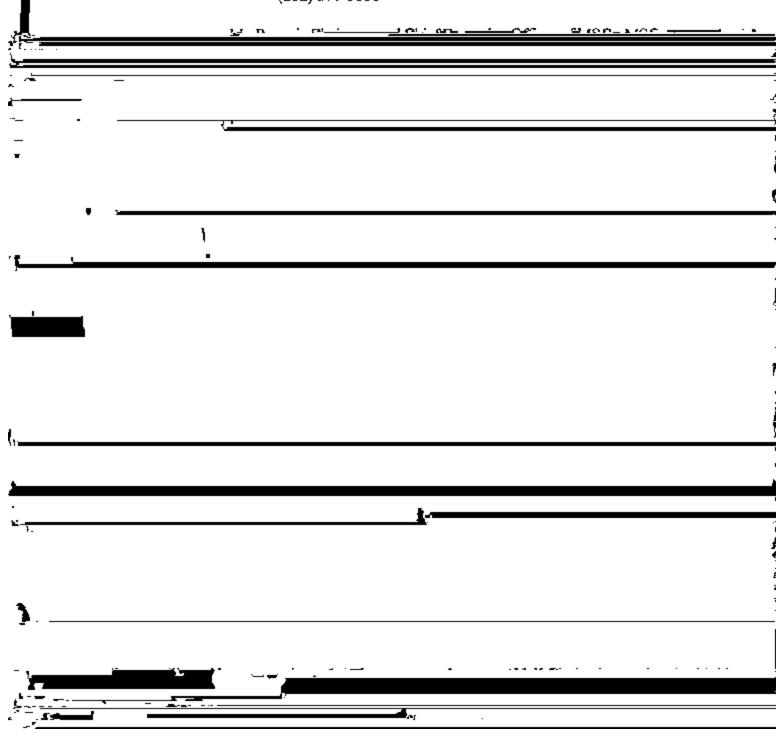
### UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION



### A. INDUSTRY WITNESSES

MSC.Software Corporation

Frank Perna c/o Tefft W. Smith, Esq. Kirkland & Ellis 655 Fifteenth Street, NW Washington, D.C. 20005 (202) 879-5000 : ::::



Michael J. Morgan c/o Tefft W. Smith, Esq. Kirkland & Ellis 655 Fifteenth Street, N.W. Washington, D.C. 20005 (202) 879-5000

Mr. Morgan is a Vice President at MSC and former President of UAI. MSC expects

Mr. Morgan to testify as to at least (a.) the highly-competitive nature of the industry, (b.) the general nature and performance of MSC's and UAI's products. (c.) as of 1999, the ineffectiveness of UAI

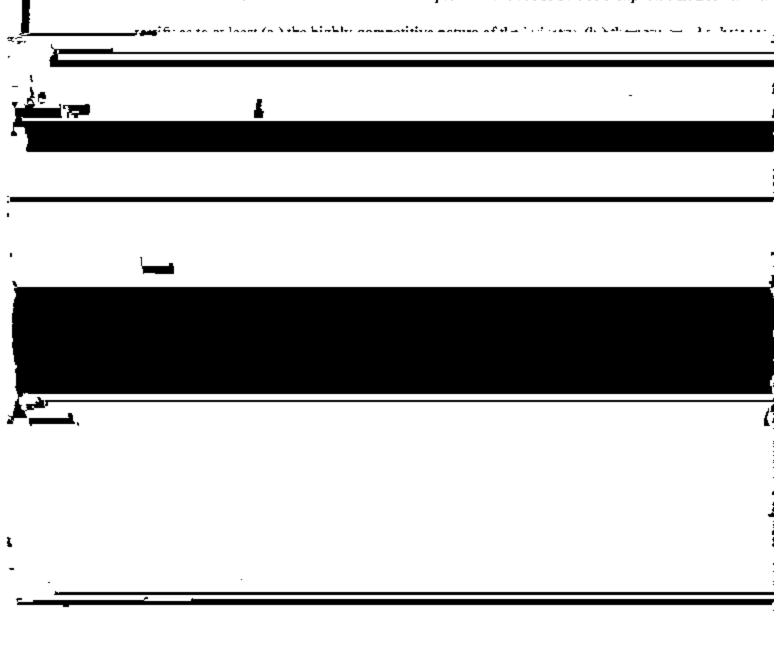
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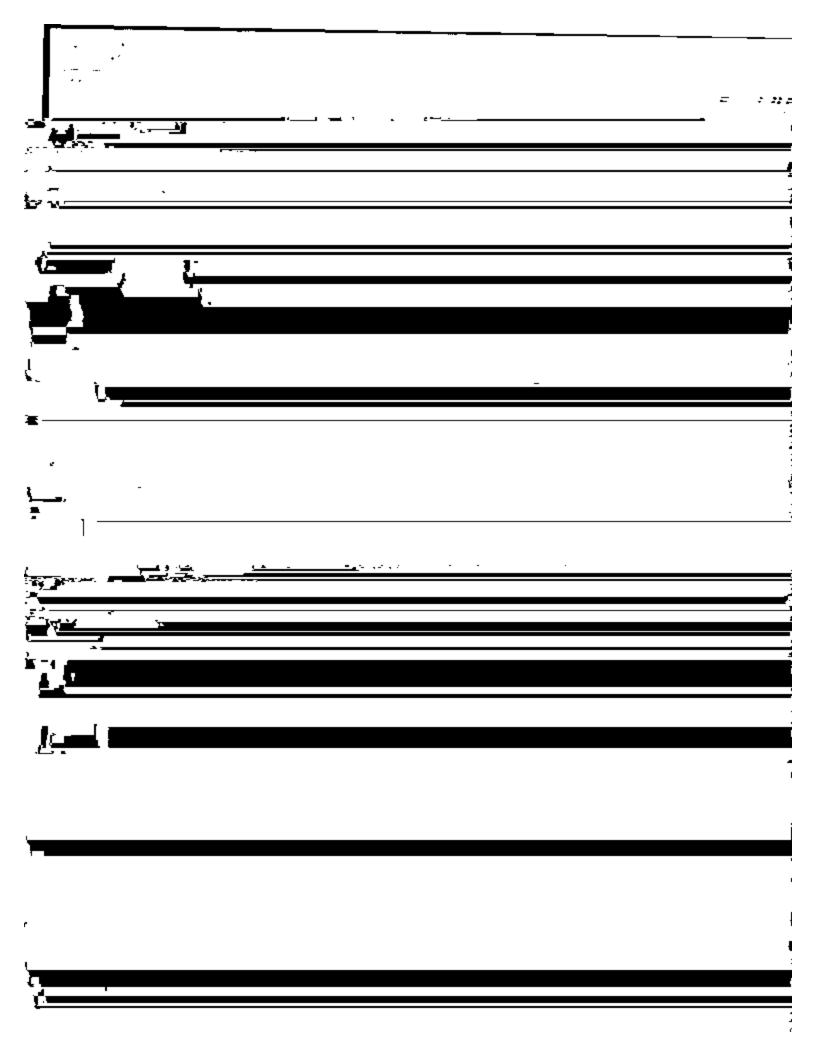
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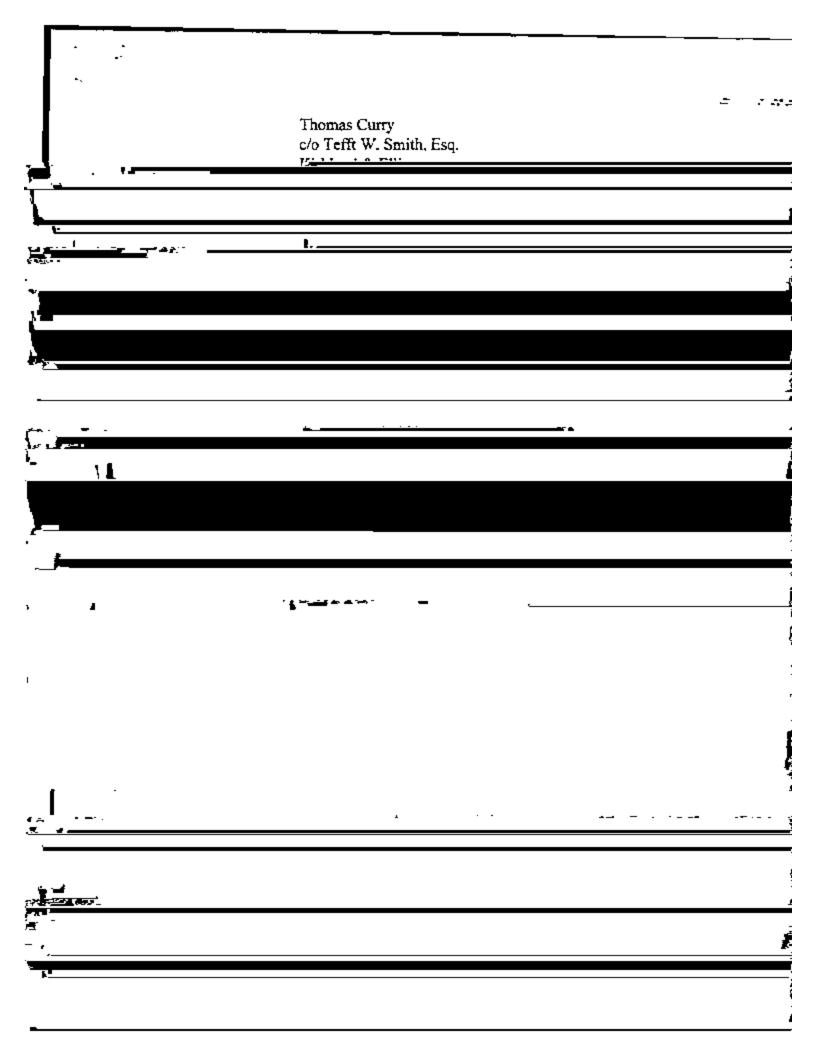
MSC's contract negotiations for the licensing of MSC.NASTRAN and other MSC products, and (c.) as of 1999, the ineffectiveness of UAI and CSAR as competitors in the industry.

Todd Brown c/o Tefft W. Smith. Esq. Kirkland & Ellis 655 Fifteenth Street, N.W. Washington, D.C. 20005 (202) 879-5000

Mr. Brown is a Senior Sales Representative at MSC. MSC expects Mr. Brown will







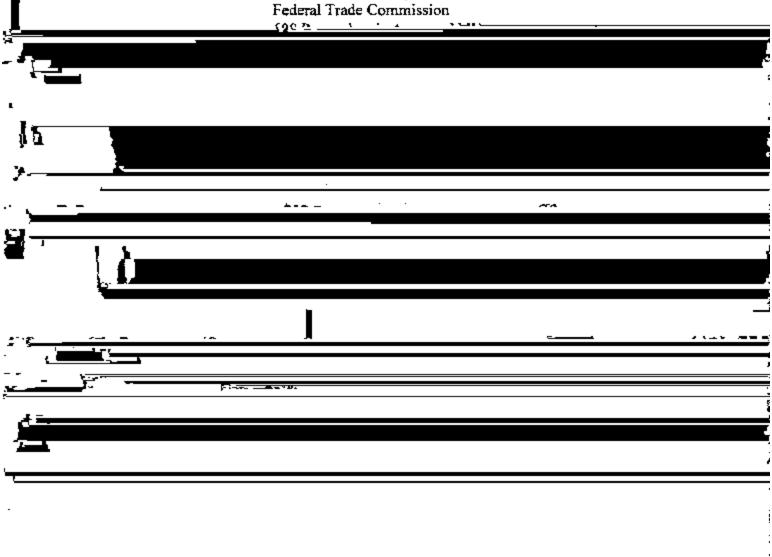
	industry, (b.) the general nature and performance of CSAR's products, (c.) as of 1999, the ineffectiveness of CSAR as a competitor in the industry, and (d.) the future prospects for CSAR had
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Rendall Davis, Esq. Federal Trade Commission 600 Pennsylvania Avenue, N.W Washington, D.C. 20005

Mr. Davis is an attorney with the FTC. MSC expects Mr. Davis to testify as to at least (a.) communications between the FTC and MSC's competitors regarding those competitors' objections to MSC's acquisitions of UAI and CSAR, (b.) the motivations for those competitors' complaints, and (c.) how the proposed relief that Complaint Counsel seeks would benefit those competitors.

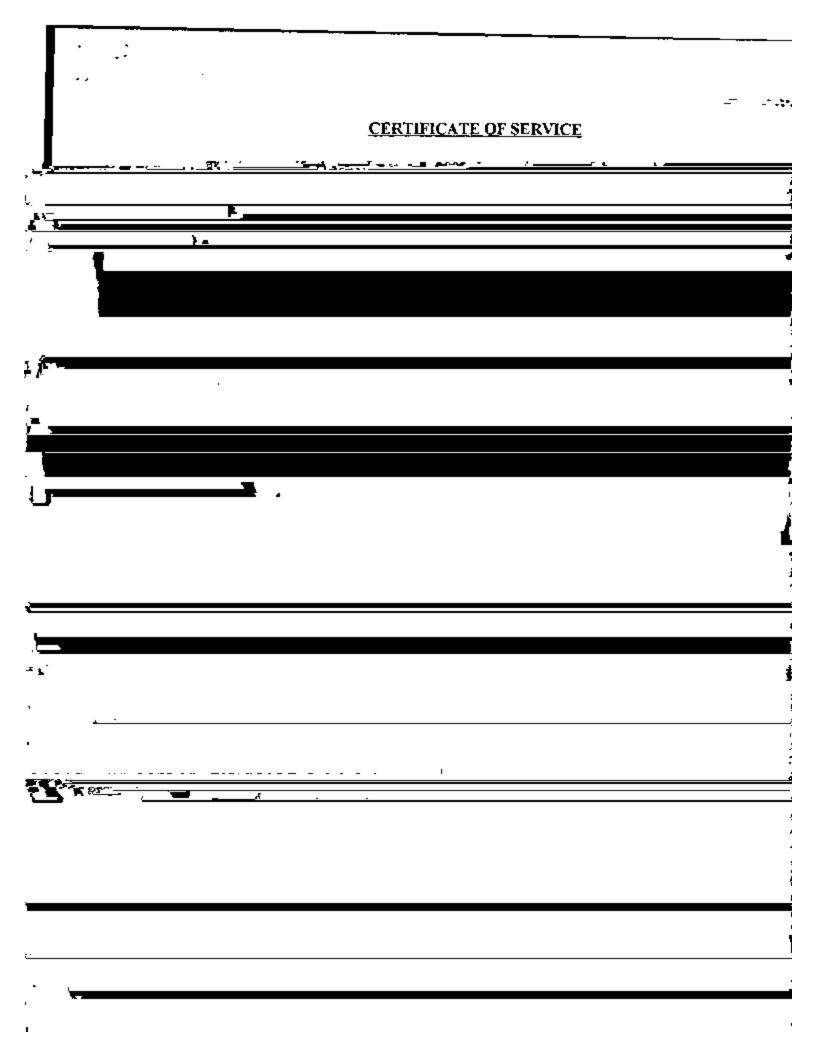
Peggy D. Bayer, Esq.



#### C. DOCUMENT WITNESSES

Respondent MSC may call as a witness individuals useful and necessary to establish the admissibility of documents produced by such third parties.

Dated: January 7, 2002



## Exhibit C



# UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

Kent Cox
Attenticy
Bureau of Competition

Direct Draft (202) 326-2058

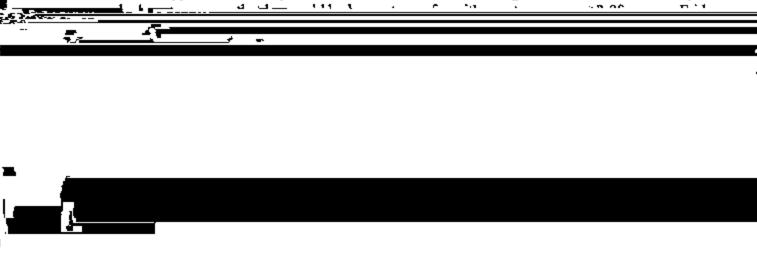
> Via Fax & First Class Mail January 9, 2002

Tefft W. Smith, Esquire KIRKLAND & ELLIS 655 Fifteenth Street, N.W. Washington, D.C. 20005

Re: Docket No. 9299

Dear Tefft:

We are in receipt of your letter dated January 7, 2002, concerning Complaint Counsel's offer to supplement our responses to MSC's First Set of Interrogatories. Abbott McCartney has



### Exhibit D



# UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

Marimichael O. Skubel, Esq. Kirkland & Ellis 655 15th Street, N.W. Washington, DC 20005

January 9, 2002

Re: FTC Docket No. 9299

VIA FAX

Dear Ms. Skubel,

We have received your letter of January 8, 2002, cancelling all but one of the scheduled