## UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

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(	F## 2 2 2007	Ì
Hora,	SECRETARY	

IN THE MATTER OF	)	
MSC.SOFTWARE CORPORATION,	)	Docket No. 9299
a corporation.	) 	

MSC.SOFTWARE CORPORATION'S RESPONSE TO COMPLAINT

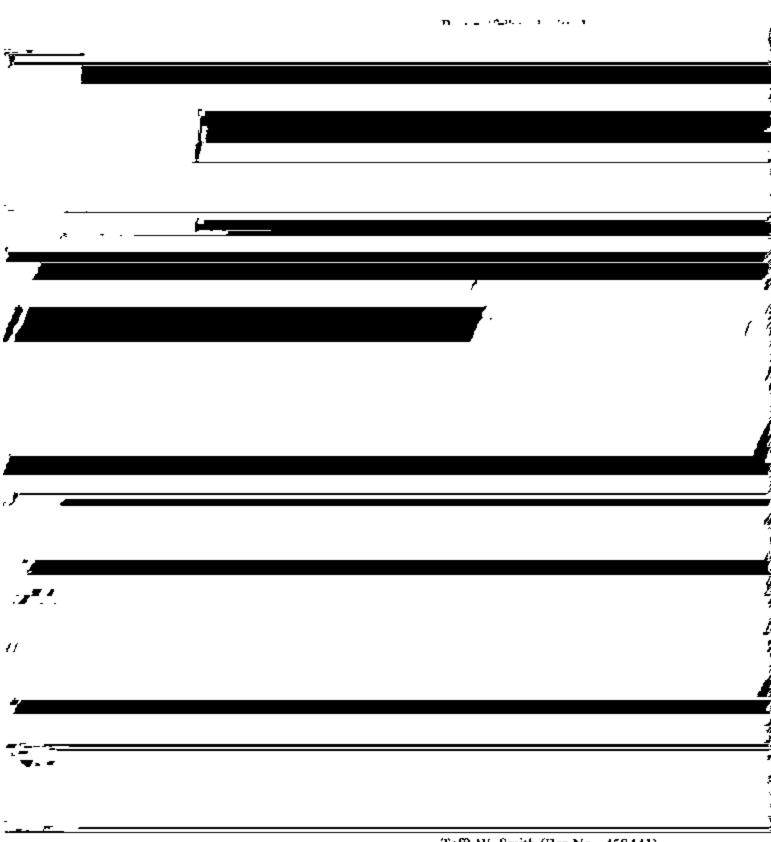
Counsel's position on discovery before deciding whether to move for reconsideration of your Honor's Order and whether and when to file a motion to compel Complaint Counsel to respond to MSC's

depositions or that we were disregarding the Order. In fact, after receiving your Honor's Order,

Counsel for MSC contacted the remaining witnesses to obtain dates that they would be available for

Exhibit A -- omitted from Complaint Counsel's Motion). Specifically, we needed to know Complaint





## CERTIFICATE OF SERVICE

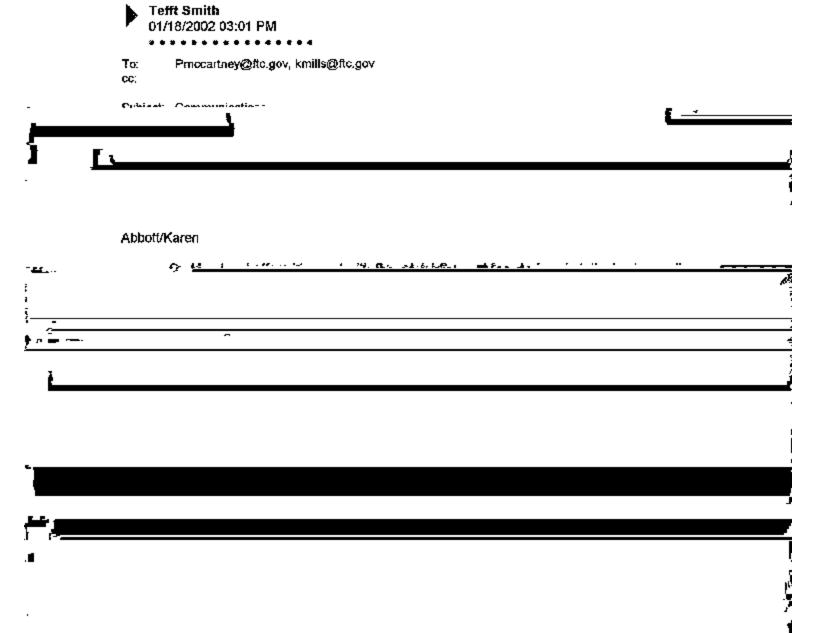
This is to certify that on January 22, 2002, I caused a copy of the attached MSC.Software Correction's Response to Correction's Response to Correction to the correction to the correction to the correction to the correction.

following persons by hand:

Honorable D. Michael Chappell Administrative Law Judge Federal Trade Commission 600 Pennsylvania Avenue, N.W. Washington, DC 20580

Richard B. Dagen, Esquire Federal Trade Commission 601 Pennsylvania Avenue, N.W. Washington, DC 20580

P. Abbott McCartney
Federal Trade Commission
601 Pennsylvania Avenue N W





## UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

Kirkland & Ellis 655 15 <sup>th</sup> Street, N.W. Washington, DC 20005  January 18, 2002  Yie Rex  Dear Mr. Smith,	Kirkland & Ellis 655 15th Street, N.W. Washington, DC 20005  January 18, 2002 Yie Rev		
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In the telephone messages we left with Marimichael today, we also said that we would like to

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From:

To:

<tefft\_smith@dc.kirkland.com>
FTC.SERIUS("kmills@ftc.gov","pmccartney@ftc.gov")

Date:

1/19/02 2:14PM

Subject:

Dkt. 9299

## Karen/Abbott

Your letter late Friday underscores the issues between us. While you continue to demand and insist that we do things and talk to you about what we are going to do, you refuse to do anything in response or to be willing to talk about your discovery obligations. And, you knowingly misrepresent what we do say and do.

