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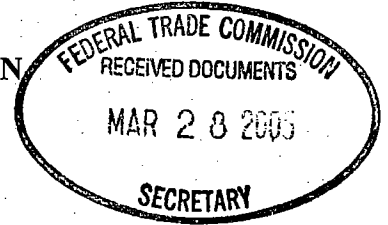
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FIRM/AFFILIATE OFFICES

- BOSTON
- CHICAGO
- HOUSTON
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UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION



In the Matter of)
)
)

CHICAGO BRIDGE & IRON COMPANY N.V.)
a foreign corporation,)

CHICAGO BRIDGE & IRON COMPANY)
a corporation,)

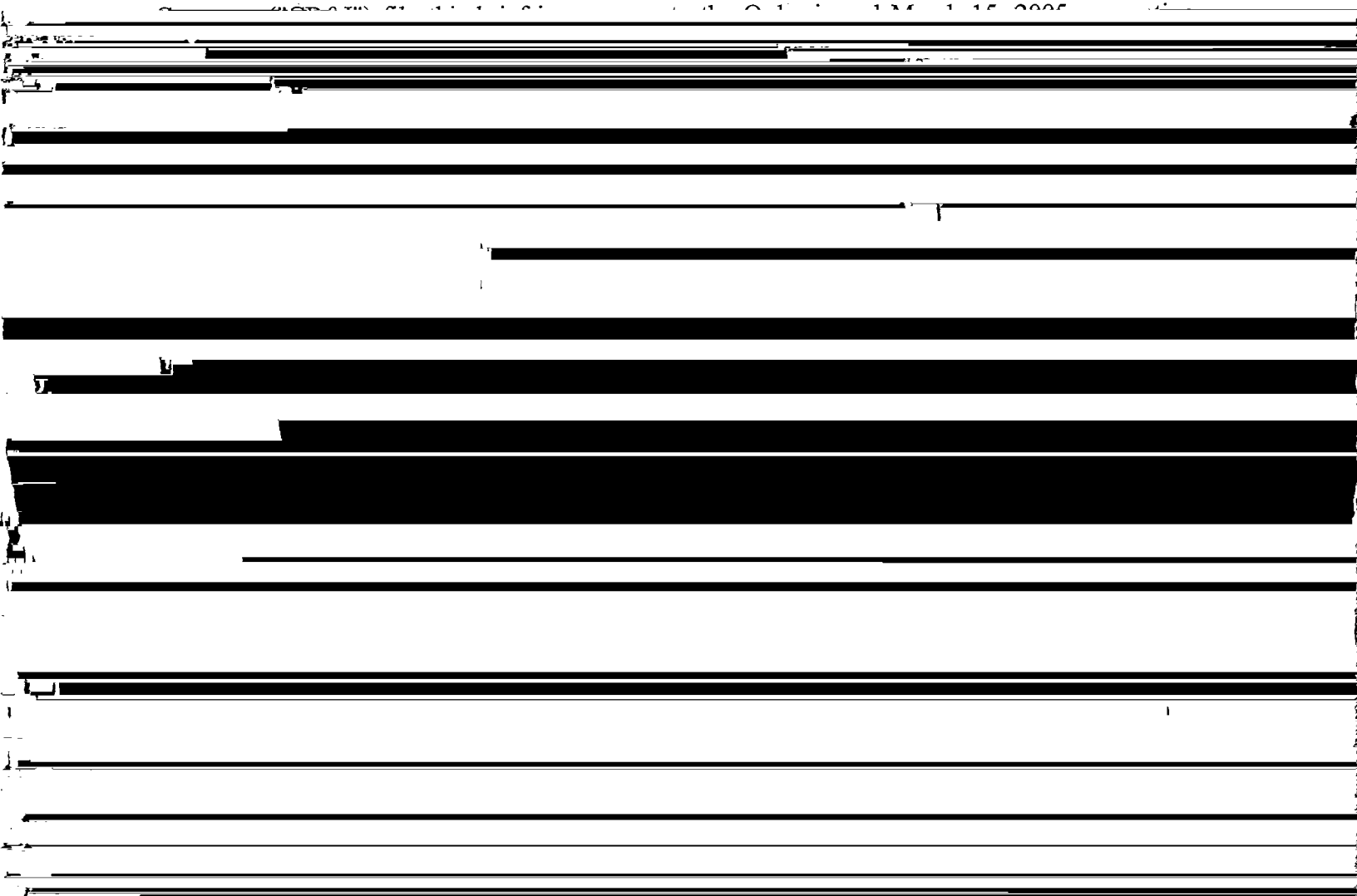
PITT-DES MOINES, INC.,)
a corporation.)

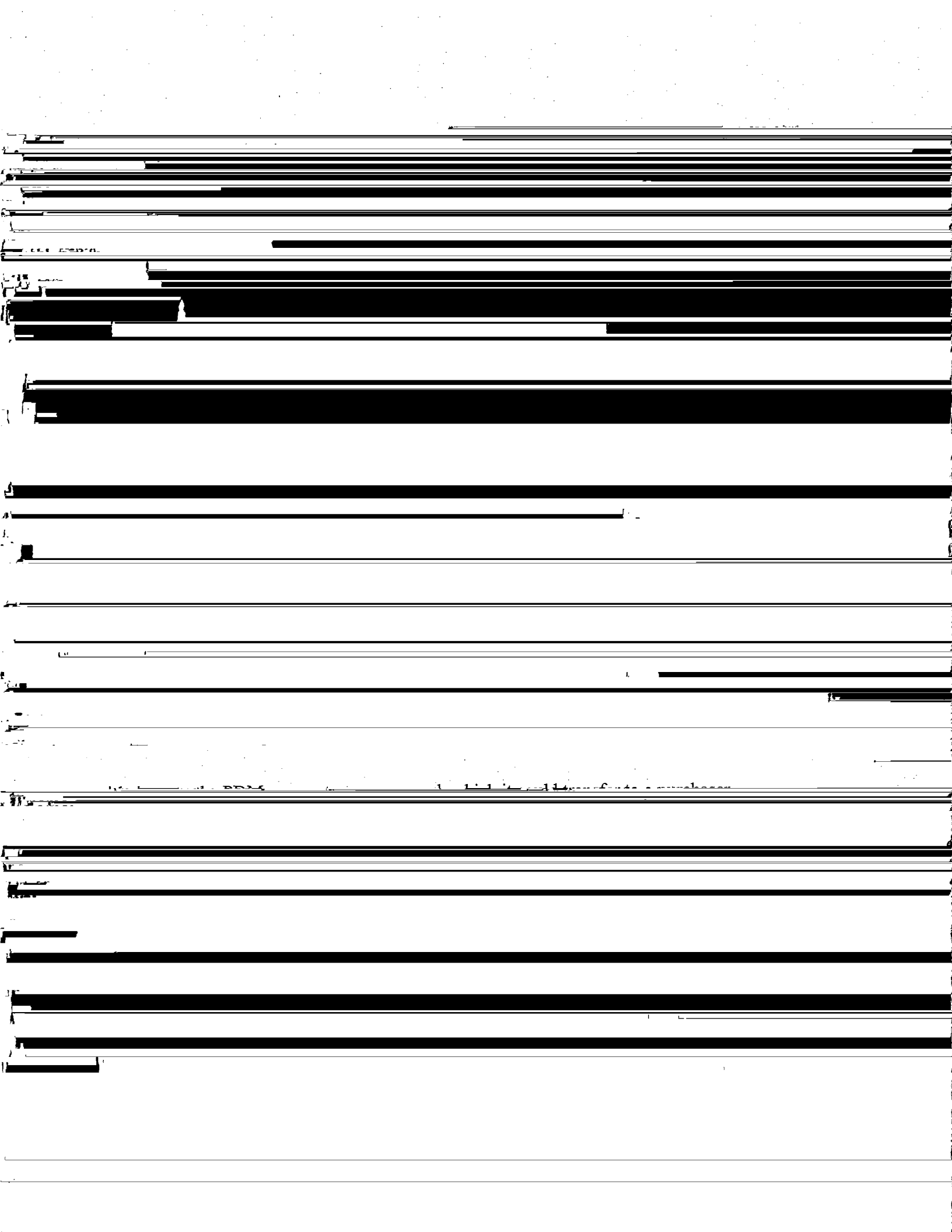
Docket No. 9300

PUBLIC

RESPONDENTS' FURTHER BRIEFING
ON COMPLAINT COUNSEL'S MOTION FOR CLARIFICATION

Respondents: Chicago Bridge & Iron Company N.V. and Chicago Bridge & Iron





competitive effects, market confusion, loss of branding value, and harm to the CB&I reputation.⁴

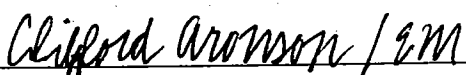
_____ made the subject of the

_____ A transitional

name would not cure this problem. The purchaser of the divested assets, regardless of name, would be an unrelated third party potentially triggering nonassignability and associated default clauses.

Dated: March 28, 2005

Respectfully submitted,


Clifford H. Aronson
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Charles W. Schwartz
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CERTIFICATE OF SERVICE

I, [REDACTED], hereby certify that on March 28, 2005, a true and correct

Donald S. Clark

Rhett R. Krulla, Esq.
Assistant Director