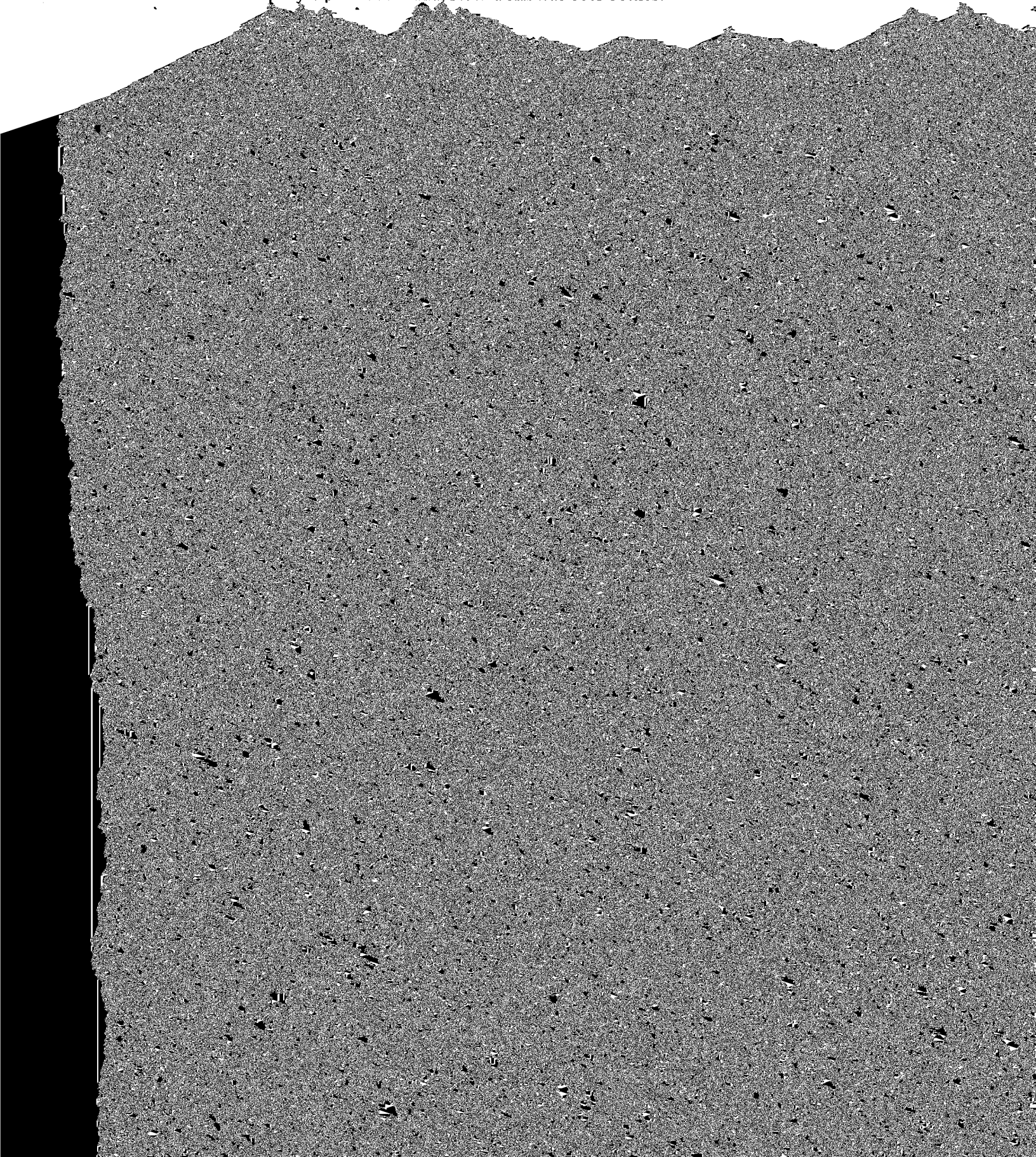


COMPLAINT COUNSEL'S REQUESTS FOR ADMISSIONS
TO RESPONDENT ARDAGH GROUP S.A.

Pursuant to the Federal Trade Commission's Rules of Practice, 16 C.P.R. § 3.32, and the Definitions and Instructions set forth below, Complaint Counsel hereby requests that Respondent Ardagh Group S.A. admit within ten (10) days the following:

1. Admit that all of the top 25 U.S. craft brewers (based on 2012 beer sales volume) package their beer in glass containers.
2. Admit that, from 2008 to 2013, the Company has bid to supply (through an informal or formal bid), either directly or through a distributor, glass containers to a craft brewer located in

7. Admit that, in 2005, more than { } of the gross output, measured by unit sales, from the Company's plant in Elmira, New York was beer bottles.



23. Admit that the capital investment needed to construct a new glass container manufacturing facility in the U.S. is at least \$150-\$200 million.

DEFINITIONS

1. The terms "Ardagh Group S.A.," "the Company," "you," or "your" mean Ardagh Group S.A., its domestic and foreign parents, predecessors, divisions, subsidiaries, affiliates,

Counsel for Respondent Saint-Gobain Containers, Inc.

CERTIFICATE FOR ELECTRONIC FILING

I certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the paper original and that I possess a paper original of the signed document that is available for review by the parties and the adjudicator.

September 12, 2013

By: *s/ Angelike Minz*

