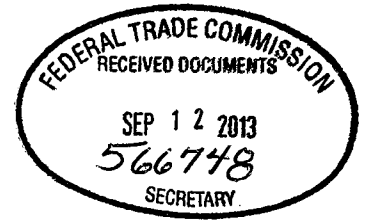


ORIGINAL

PUBLIC

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES



In the Matter of

Ardagh Group S.A.,
a public limited liability company, and

Compagnie de Saint-Gobain, a corporation,
and

PUBLIC

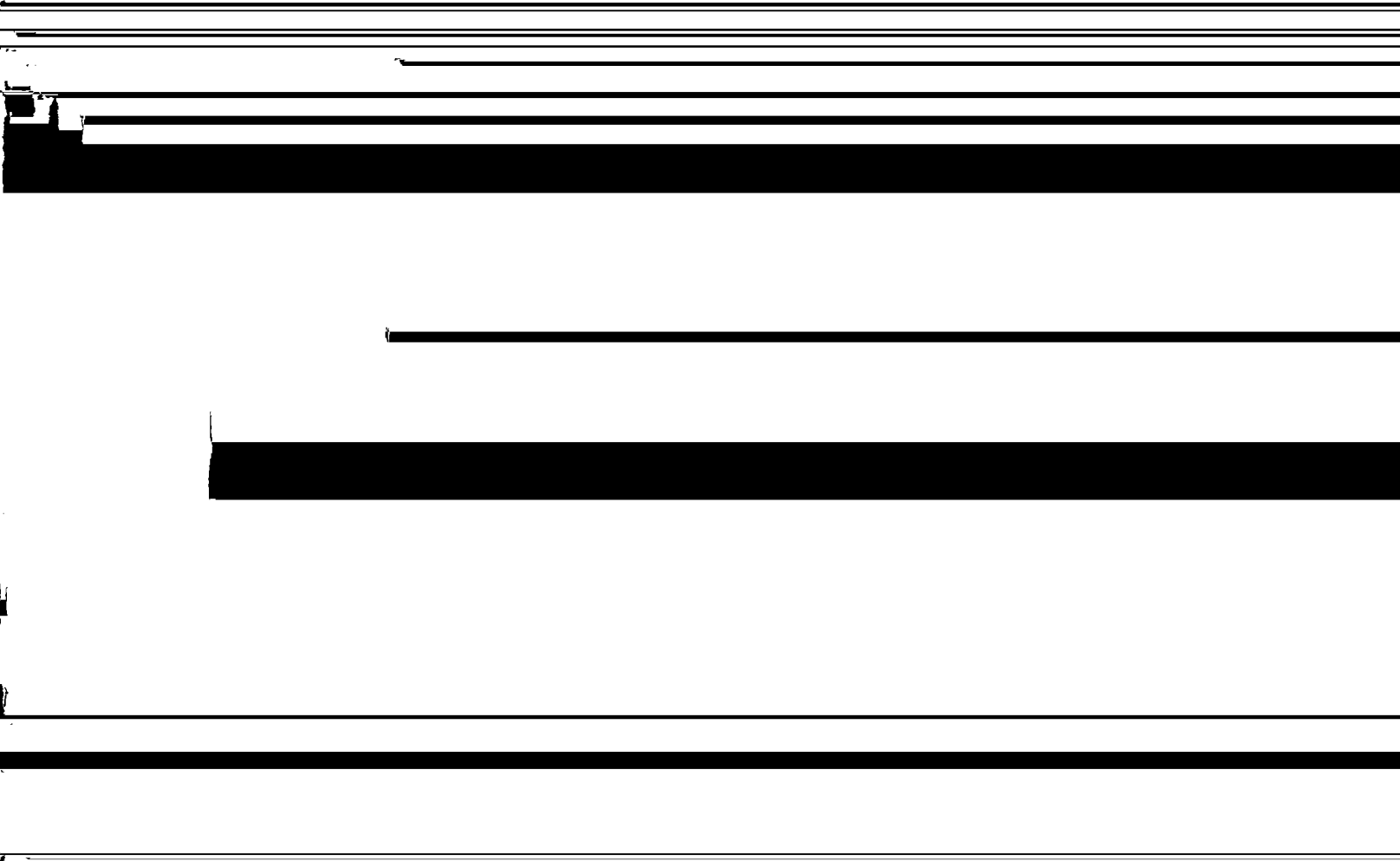
DOCKET NO. 9356

**COMPLAINT COUNSEL'S REQUESTS FOR ADMISSIONS
TO RESPONDENTS COMPAGNIE DE SAINT-GOBAIN AND
SAINT-GOBAIN CONTAINERS, INC.**

Pursuant to the Federal Trade Commission's Rules of Practice, 16 C.F.R. § 3.32, and the Definitions and Instructions set forth below, Complaint Counsel hereby requests that Respondents Compagnie De Saint-Gobain and Saint-Gobain Containers, Inc. admit within ten (10) days the following:

7. Admit that craft beer bottles and mass beer bottles can be manufactured using the same furnace and same individual setting machine.
8. Admit that the Company bid to supply (through an informal or formal bid) { } in 2009.
9. Admit that the Company bid to supply (through an informal or formal bid) { } in 2012.
10. Admit that the Company bid to supply (through an informal or formal bid) { } in 2013.
11. Admit that the Company bid to supply (through an informal or formal bid), either directly or through a distributor, { } in 2012.
12. Admit that the Company bid to supply (through an informal or formal bid), either directly or through a distributor, { } in 2013.
13. Admit that the Company bid to supply (through an informal or formal bid), either directly or through a distributor, { } in 2010.
14. Admit that the Company bid to supply (through an informal or formal bid), either directly or through a distributor, { } in 2012.

15. Admit that the Company bid to supply (through an informal or formal bid), either directly or through a distributor, { } in 2012.



DEFINITIONS

1. The terms “Compagnie de Saint-Gobain,” “the Company,” “you,” or “your” mean Compagnie de Saint-Gobain, its domestic and foreign parents, predecessors, divisions,

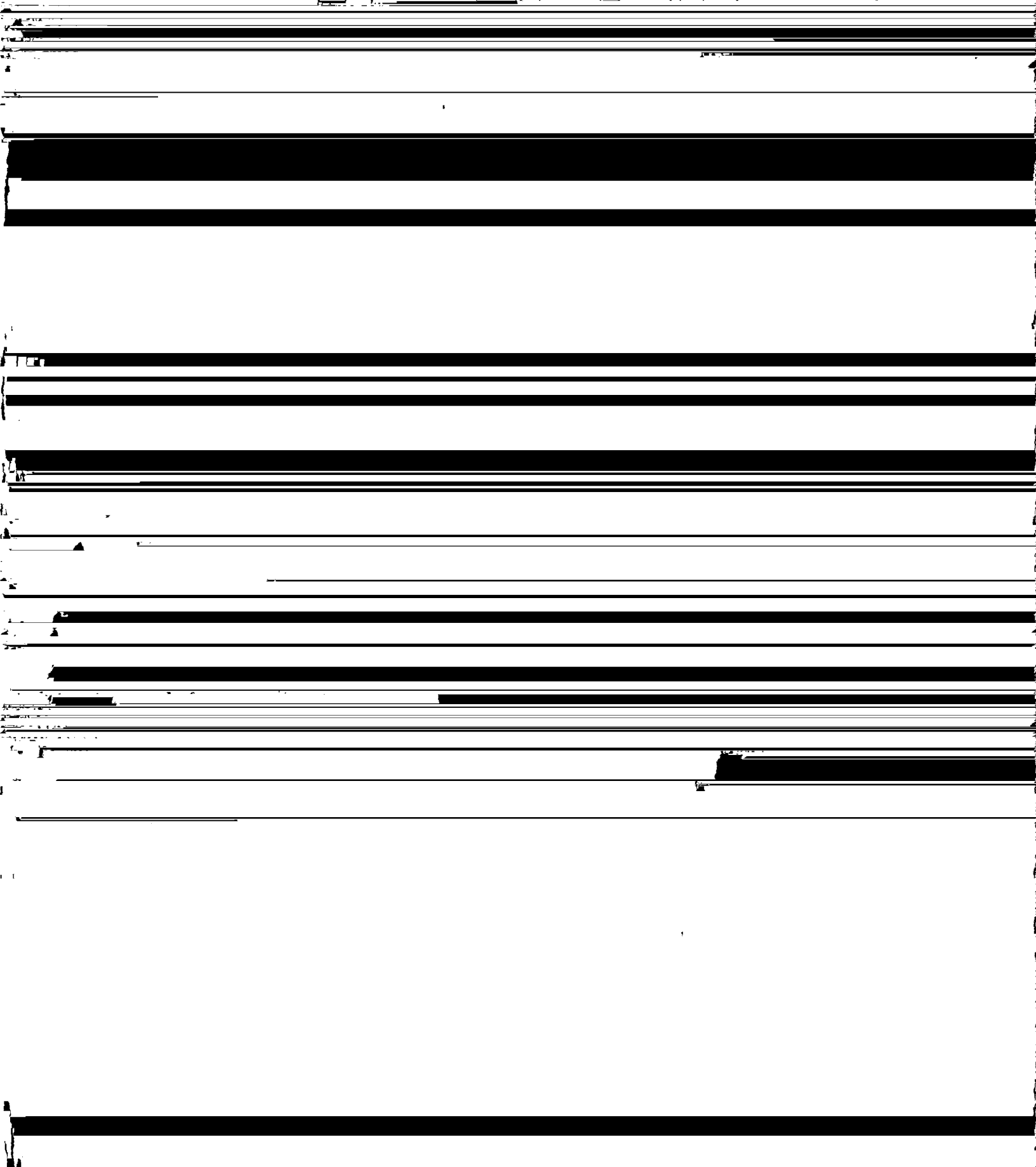
employees, agents, and representatives of the foregoing. The terms “subsidiary,” “affiliate,” and “joint venture” refer to any person in which there is partial (i.e., 25 percent or more) or total ownership or control between the Company and any other person.

2. The terms “craft beer,” “craft brewery,” and “mass beer” have the same meaning as used in the Expert Report of Dr. Chetan Sanghvi filed in Federal Trade Commission v. Ardagh Group S.A., Civil Action No. 1:13-cv-01021 (RMC) filed in District Court for the District of Columbia on September 4, 2013.

INSTRUCTIONS

1. Provide separate and complete sworn written responses for each Request for Admission

7. If you consider that a matter of which an admission has been requested presents a



September 12, 2012

Re: [REDACTED]

s/ Edward D. Hassi

EDWARD D. HASSI
Chief Litigation Counsel
Federal Trade Commission
Bureau of Competition
600 Pennsylvania Ave., NW
Washington, DC 20580
Telephone: (202) 326-2470
Facsimile: (202) 326-2884
Email: ehassi@ftc.gov

Attorney for Complaint Counsel

CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2013, I filed the foregoing document electronically.

using the FTC's E-Filing System, which will send notification of such filing to:

Donald S. Clark
Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-113
Washington, DC 20580

I also certify that I delivered via electronic mail and hand delivery a copy of the foregoing document to:

The Honorable D. Michael Chappell
Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-110
Washington, DC 20580

I further certify that I delivered via electronic mail a copy of the foregoing document to:

Alan Goudiss
Dale Collins
Richard Schwed
Lisl Dunlop
Shearman & Sterling LLP
599 Lexington Avenue
New York, NY 10022
(202) 848-4906
agoudiss@shearman.com

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 Mina
Attorney