

ABA # 296

COUNSELORS AT LAW

June 1, 2000

**VIA HAND DELIVERY**

**Confidential**

Michael Verne  
Premerger Notification Office  
Bureau of Competition

6th and Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

Re: Restructuring of Transaction

Dear Mr. Verne:

On March 31 of this year, [REDACTED] made an HSR filing for the acquisition of 100% of the voting securities of [REDACTED] (Transaction [REDACTED]). Early termination of the waiting period was granted on April 11.

In a related transaction, [REDACTED] also intended to acquire 100% of the voting securities of [REDACTED]

[REDACTED] made reference to the acquisition of [REDACTED] because the two companies had the same shareholders each with the same percentage ownership of the two companies.

