

802.2(c)

ATTORNEYS & COUNSELORS

August 4, 2000

Via Facsimile (202) 326-2624
Ms. Nancy Ovuka
Premerger Notification Office
Bureau of Competition, Room 303
Federal Trade Commission
6th Street & Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Dear Ms. Ovuka:

This letter is to confirm our discussion this morning that the following transaction qualifies as exempt under Section 802.2(c) of the rules promulgated under the Hart-Scott-Rodino Antitrust Improvements Act of 1976, as amended.

In a transaction between competitors, Party A is selling to Party B two parcels of real estate on which facilities are being constructed. No operations are conducted on each parcel. In

If my understanding of the applicability of the exemption is incorrect, please advise me at [redacted] on or before August 9, 2000.

Very truly yours,