

Sec. 7A(a); 801.11(b)(2)

[Redacted]

[Redacted]

[Redacted]

January 6, 1993

Federal Trade Commission
Premerger Notification
Room 303
Sixth & Pennsylvania Ave. N.W.
Washington, D.C. 20580

U.S. Department of Justice

1/11/93 - called [Redacted] He advised that [Redacted] and the latter's financial records reflect the sense of [Redacted] is a single entity and controls [Redacted] The January and [Redacted] balance sheets are for 12/31/91. Of the 12 months [Redacted] will become the sole [Redacted]

Washington, D.C. 20580
Attn: Klaine Gibbs, Esq.
Re: 15 USCA 18(a) Notification
Dear Sir or Madam:

date not more than 12 months [Redacted] commencing of the acquisition, indicate that there is nothing [Redacted] or [Redacted] prior involved in the transaction. Consequently, no HSR filing is required. [Redacted]

The undersigned represents [Redacted] (hereinafter "[Redacted]") which is the holding company for [Redacted] (hereinafter "[Redacted]")

[Redacted] located in [Redacted] (hereinafter "[Redacted]").

[Redacted] and [Redacted] have agreed to affiliate utilizing an amendment to the [Redacted] Certificate of Incorporation whereby [Redacted] will become the sole member of [Redacted] and its affiliates have annual revenues of approximately [Redacted] and assets of approximately [Redacted] while [Redacted] has revenues of approximately [Redacted] and assets of approximately [Redacted]

We do not believe that this acquisition constitutes a transaction covered by 15 USCA 18(a) and we would request [Redacted] of that position at your earliest possible convenience.

Very truly yours,
[Redacted]