

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

05 21 2018  
590831

**In the Matter of**

**Tronox Limited**  
a corporation,

**National Industrialization Company**  
**(TASNEE)**  
a corporation,

**National Titanium Dioxide Company**  
**Limited (Cristal)**  
a corporation,

**And**

**Cristal USA Inc.**  
a corporation.

**ORIGINAL**

**Docket No. 9377**

**RESPONDENTS' CERTIFICATION REGARDING MOTION TO COMPEL**

I certify that before filing Respondents' Motion to Compel with regard to Cristal Interrogatory #1 on Monday, May 21, 2018, counsel for Respondents and Complaint Counsel met and conferred as follows:

On Tuesday, May 15, 2018, the parties met and conferred about a variety of matters, including Complaint Counsel's response to Cristal Interrogatory #1. Michael Williams, Michael DeRita, and Paul Switter participated from Kirkland & Ellis, on behalf of Tronox, Ltd. ("Tronox"). James Cooper and Peter Levitas participated from Arnold & Porter on behalf of the National Titanium Dioxide Company Limited ("Cristal"). Dominic Vote, Joonsuk Lee, and Cem Aklemen participated on behalf of Complaint Counsel. The meeting took place by phone, beginning at 10:00 a.m. and ending at approximately 11:10 a.m. The parties undertook a good faith effort to

resolve the dispute over Cristal Interrogatory #1. Complaint Counsel agreed to supplement the response to Cristal Interrogatory #1 by 5:00 p.m. on May 17, 2018.

On Monday, May 21, 2018, the parties met and conferred again about Complaint Counsel's

PUBLIC

601 Massachusetts Avenue, NW  
Washington, D.C. 20001-3743  
(202) 942-5000  
(202) 942-5999 (facsimile)  
james.cooper@arnoldporter.com  
peter.levitas@arnoldporter.com  
ryan.watts@arnoldporter.com  
matthew.shultz@arnoldporter.com

**ATTORNEYS FOR NATIONAL  
INDUSTRIALIZATION COMPANY  
(TASNEE), THE NATIONAL  
TITANIUM DIOXIDE COMPANY  
LIMITED (CRISTAL), AND CRISTAL  
USA INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on May 21, 2018, 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  
[ElectronicFilings@ftc.gov](mailto:ElectronicFilings@ftc.gov)

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

I also certify that I caused the foregoing document to be served via email to:

Chuck Loughlin  
Dominic Vote

James L. Cooper  
Seth Wiener

Federal Trade Commission  
600 Pennsylvania Ave. NW  
Washington, DC 20580  
[cloughlin@ftc.gov](mailto:cloughlin@ftc.gov)  
[dvote@ftc.gov](mailto:dvote@ftc.gov)

Arnold & Porter Kaye Scholer LLP  
601 Massachusetts Ave, NW  
Washington DC 20001  
[james.cooper@arnoldporter.com](mailto:james.cooper@arnoldporter.com)  
[seth.wiener@arnoldporter.com](mailto:seth.wiener@arnoldporter.com)  
[carlamaria.mata@arnoldporter.com](mailto:carlamaria.mata@arnoldporter.com)

*Counsel supporting Complaint*

*Counsel for Respondents National Industrialization Company (TASNEE), The National Titanium Dioxide Company Limited (Cristal), and Cristal USA, Inc.*

/s/ Michael F. Williams  
Michael F. Williams

Counsel for Respondents Tronox Limited

**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.

May 21, 2018

By: /s/ Michael F. Williams  
Michael F. Williams

Notice of Electronic Service

**I hereby certify that on May 22, 2018, I filed an electronic copy of the foregoing Respondents' Motion to Compel Complaint Counsels' Response to Cristal Interrogatory #1, with:**

D. Michael Chappell  
Chief Administrative Law Judge  
600 Pennsylvania Ave., NW  
Suite 110  
Washington, DC, 20580

Donald Clark  
600 Pennsylvania Ave., NW  
Suite 172  
Washington, DC, 20580

**I hereby certify that on May 22, 2018, I served via E-Service an electronic copy of the foregoing Respondents' Motion to Compel Complaint Counsels' Response to Cristal Interrogatory #1, upon:**

Seth Wiener  
Arnold & Porter Kaye Scholer LLP  
seth.wiener@apks.com  
Respondent

Matthew Shultz  
Arnold & Porter Kaye Scholer LLP  
matthew.shultz@apks.com  
Respondent

Albert Teng  
Arnold & Porter Kaye Scholer LLP  
albert.teng@apks.com  
Respondent

Michael Williams  
Kirkland & Ellis LLP  
michael.williams@kirkland.com  
Respondent

David Zott  
Kirkland & Ellis LLP  
dzott@kirkland.com  
Respondent

Matt Reilly  
Kirkland & Ellis LLP  
matt.reilly@kirkland.com  
Respondent

Andrew Pruitt  
Kirkland & Ellis LLP  
andrew.pruitt@kirkland.com  
Respondent

Susan Davies  
Kirkland & Ellis LLP  
susan.davies@kirkland.com  
Respondent

Michael Becker  
Kirkland & Ellis LLP  
mbecker@kirkland.com  
Respondent

Karen McCartan DeSantis  
Kirkland & Ellis LLP  
kdesantis@kirkland.com  
Respondent

Megan Wold  
Kirkland & Ellis LLP  
megan.wold@kirkland.com  
Respondent

Michael DeRita  
Kirkland & Ellis LLP  
michael.derita@kirkland.com  
Respondent

Charles Loughlin  
Attorney  
Federal Trade Commission  
cloughlin@ftc.gov  
Complaint

Cem Akleman  
Attorney  
Federal Trade Commission  
cakleman@ftc.gov  
Complaint

Thomas Brock  
Attorney  
Federal Trade Commission  
TBrock@ftc.gov  
Complaint

Krishna Cerilli  
Attorney  
Federal Trade Commission  
kcerilli@ftc.gov  
Complaint

Steven Dahm  
Attorney  
Federal Trade Commission  
sdahm@ftc.gov  
Complaint

E. Eric Elmore  
Attorney  
Federal Trade Commission  
eelmore@ftc.gov  
Complaint

Sean Hughto  
Attorney  
Federal Trade Commission

shughto@ftc.gov  
Complaint

Joonsuk Lee  
Attorney  
Federal Trade Commission  
jlee4@ftc.gov  
Complaint

Meredith Levert  
Attorney  
Federal Trade Commission  
mlevert@ftc.gov  
Complaint

Jon Nathan  
Attorney  
Federal Trade Commission  
jnathan@ftc.gov  
Complaint

James Rhilinger  
Attorney  
Federal Trade Commission  
jrhilinger@ftc.gov  
Complaint

Blake Risenmay  
Attorney  
Federal Trade Commission  
brisenmay@ftc.gov  
Complaint

Kristian Rogers  
Attorney  
Federal Trade Commission  
krogers@ftc.gov  
Complaint

Z. Lily Rudy  
Attorney  
Federal Trade Commission  
zrudy@ftc.gov  
Complaint

Robert Tovsky  
Attorney  
Federal Trade Commission  
rtovsky@ftc.gov  
Complaint

Dominic Vote  
Attorney  
Federal Trade Commission  
dvote@ftc.gov  
Complaint

Cecelia Waldeck  
Attorney



Federal Trade Commission  
cwaldeck@ftc.gov  
Complaint

Katherine Clemons  
Associate  
Arnold & Porter Kaye Scholer LLP  
katherine.clemons@arnoldporter.com  
Respondent

Eric D. Edmondson  
Attorney  
Federal Trade Commission  
eedmondson@ftc.gov  
Complaint

David Morris  
Attorney  
Federal Trade Commission  
DMORRIS1@ftc.gov  
Complaint

Zachary Avallone  
Kirkland & Ellis LLP  
zachary.avallone@kirkland.com  
Respondent

Rohan Pai  
Attorney  
Federal Trade Commission  
rpai@ftc.gov  
Complaint

Rachel Hansen  
Associate  
Kirkland & Ellis LLP  
rachel.hansen@kirkland.com  
Respondent

Peggy D. Bayer Femenella  
Attorney  
Federal Trade Commission  
pbayer@ftc.gov  
Complaint

Grace Brier  
Kirkland & Ellis LLP  
grace.brier@kirkland.com  
Respondent

Alicia Burns-Wright  
Attorney  
Federal Trade Commission  
aburnswright@ftc.gov  
Complaint

**I hereby certify that on May 22, 2018, I served via other means, as provided in 4.4(b) of the foregoing Respondents' Motion to Compel Complaint Counsels' Response to Cristal Interrogatory #1, upon:**

Seth Weiner  
Arnold & Porter Kaye Scholer LLP  
Respondent

Andrew Pruitt  
Attorney