

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

06 04 2018
590977

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,)
)
Respondents.)
_____)

ORIGINAL

DOCKET NO. 9377

**RESPONDENT TRONOX LIMITED'S RESPONSE TO
LOMON BILLIONS' MOTION TO QUASH**

From the outset of discovery, Respondent Tronox Limited ("Tronox") has sought Lomon Billions' participation as a relevant third party in this case. Lomon Billions is the largest Chinese producer of titanium dioxide ("TiO2") and one of the largest TiO2 producers in the world. The actions of Chinese TiO2 producers, including Lomon Billions in

lapses in time, Lomon Billions agreed to produce a small number of documents from an international entity and a representative most knowledgeable only from Billions America Corporation. Lomon Billions designated Director of Sales, North America, Megan O'Malley Noe,

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 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
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Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-113
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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
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Counsel supporting Complaint

Counsel for Respondents National Industrialization

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

Notice of Electronic Service

I hereby certify that on June 04, 2018, I filed an electronic copy of the foregoing Respondent Tronox Limited's Response to Lomon Billion's Motion to Quash, with:

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

Donald Clark
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I hereby certify that on June 04, 2018, I served via E-Service an electronic copy of the foregoing Respondent Tronox Limited's Response to Lomon Billion's Motion to Quash, upon:

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