

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MITCHELL P. RALES,

Defendant.

Civil Action No. 1:17-cv-00103
(CRC)

**MOTION AND MEMORANDUM OF THE UNITED STATES IN SUPPORT OF ENTRY
OF FINAL JUDGMENT**

Pursuant to the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16(b)-(h) (“APPA”), plaintiff United States of America (“United States”) moves for entry of the proposed Final Judgment filed on January 17, 2017 (Document 1-3). The proposed Final Judgment may be entered at this time without further proceedings if the Court determines that entry is in the public interest. 15 U.S.C. § 16(e). The Competitive Impact Statement (“CIS”) filed by the United States on January 17, 2017 (Document 1-5), explains why entry of the proposed Final Judgment is in the public interest. The United States is filing simultaneously with this Motion and

The Complaint alleges that the Defendant violated Section 7A of the Clayton Act, 15

enforcement by giving the agencies an opportunity to investigate certain large acquisitions before they are consummated.

As alleged in the Complaint, Defendant's wife

States filed the CIS with the Court on January 17, 2017, and published the proposed Final

interest standard under the APPA and now incorporates those portions of the Competitive Impact Statement by reference.

IV. CONCLUSION

For the reasons set forth in this Motion and Memorandum and the CIS, the Court should find that the proposed Final Judgment is in the public interest and should enter the proposed Final Judgment without further proceedings. The United States respectfully requests that the proposed Final Judgment, attached hereto as Exhibit 2, be entered at this time.

Dated: April 7, 2017

Respectfully Submitted,

/s/ Kenneth A. Libby
Kenneth A. Libby
Special Attorney