

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of)	
ASPEN TECHNOLOGY, INC.)	Docket No. 9310
a corporation)	

DECLARATION OF ROBERT NEWTON

I, Robert Newton, based upon my personal knowledge concerning matters to which I am competent to testify, hereby declare as follows:

1. I am the Engineering Lead for the Nylon Platform at Solutia, Inc. (“Solutia”).
2. Solutia is not a party to the captioned matter.
3. I have reviewed the documents and deposition transcript for which Solutia seeks in camera treatment. Based upon my review of these materials, my knowledge of Solutia’s business, and my familiarity with the confidentiality protection that Solutia affords information of this type, it is my belief that disclosure of these materials to the public and to non-legal employees of Aspen Technology, Inc. would likely cause substantial commercial harm to Solutia.
4. The documents in question contain highly sensitive, non-public information regarding Solutia’s internal strategies concerning its engineering software needs. This information is held in strict confidence by Solutia.
5. I believe that if the confidential information in these documents is disclosed to the public, Solutia is likely to suffer serious competitive harm because

companies such as Aspen Technology would have access to information that could allow them to shape their future negotiations with Solutia.

I declare under penalty of perjury under the Laws of the United States of America that the foregoing is true and correct. Executed this 19th day of April, 2004, in St. Louis, Missouri.

 /s/ Robert Newton
Robert Newton

Solutia, Inc.