UNITED STATES OF AMERICA BEFORE FEDERAL TRADE COMMISSION

In the Matter of			Public
UNION OIL COMPANY OF CALIFORNIA,)	Docket No. 9305	
a corporation.)))		

UNOPPPOSED MOTION FOR EXTENSION OF TIME TO MOVE TO QUASH OR LIMIT SUBPOENAS

Non-parties BP West Coast Products, LLC, Chevron U.S.A., Inc., Exxon Mobil Corporation, and Shell Oil Products Company (collectively, "the non-party refiners") file this motion to extend the time permitted for them to move to quash or limit Subpoenas Duces Tecum issued on March 20, 2003, in the above-captioned matter.

Union Oil Company of California ("Unocal") served these Subpoenas on April 9, 2003. Under applicable provisions of the Federal Trade Commission's Rules of Practice, the time to move to quash or limits these Subpoenas will expire on April 21, 2003. Counsel for the non-party refiners have initiated discussions with counsel for Unocal in order, to the extent possible, to resolve the non-party refiners' concerns about the scope of the Subpoenas through negotiation. Due to the scope of Unocal's document requests (each Subpoena contains 60 or more

¹ The Subpoenas were served on Donald B. Craven, Esq., a partner at Akin Gump Strauss Hauer & Feld, LLP, which represents the non-party refiners. However, two of the Subpoenas – specifically, those issued to BP America and Chevron Texaco Corp. -- were addressed to parents of the companies for whom this firm is authorized to accept service. In addition, a third Subpoena was served on Shell Oil USA, which has no formal legal existence. We have informed counsel for Unocal of the names of the entities for which we are authorized to accept service, and we have proposed that Unocal accept substitution of these entities for the entities named in the existing Subpoenas in order to avoid the need for reissuance. We are working to confirm that the entities we propose to substitute are the relevant and proper entities for purposes of producing documents responsive to the Subpoenas, and believe that we will be able to formalize an agreement with Unocal on the substitution shortly.

specifications and three pages of instructions and definitions) and the complexity of the issues

that they raise, more time will be required to complete these discussions.

Counsel for Unocal has agreed to a ten-day extension of time, through and including May

1, 2003, for the non-party refiners to move to quash or limit the Subpoenas. Counsel for the

Federal Trade Commission has indicated that the Bureau of Competition will not oppose this

extension.

DATED: April 21, 2003

Respectfully submitted,

C. Fairley Spillman AKIN GUMP STRAUSS HAUER & FELD, LLP

1333 New Hampshire Ave., NW Washington, DC 20036

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[PROPOSED] ORDER

Upon consideration of the Unopposed Motion For Extension Of Time To Move To

Quash Or Limit Subpoenas, filed in the above-captioned matter by non-parties BPWest Coast

Products, LLC, Chevron U.S.A., Inc., Exxon Mobil Corporation, and Shell Oil Products

Company, it is hereby ordered that the movants shall be given until May 1, 2003, to file a motion to quash or limit.

The Honorable D. Michael Chappell Administrative Law Judge

CERTIFICATE OF SERVICE

I certify that on April 21, 2003, I caused an original and two copies of the non-party refiners' Unopposed Motion For Extension Of Time To Move To Quash Or Limit Subpoenas to be filed by hand and one electronic copy of that motion to be filed by electronic mail with:

Donald S. Clark Secretary Federal Trade Commission 600 Pennsylvania Avenue, NW, Rm. H-159 Washington, DC 20580

I also certify that on April 21, 2003, I caused two copies of the foregoing motion to be served by U.S. mail upon:

The Honorable D. Michael Chappell Administrative Law Judge Federal Trade Commission 600 Pennsylvania Avenue, NW Washington, DC 20580

I also certify that on April 21, 2003, caused one copy of the foregoing motion to be served by hand delivery upon each person listed below:

J. Robert Robertson, Esq. Senior Litigation Counsel Bureau of Competition Federal Trade Commission 600 Pennsylvania Avenue, NW Washington, DC 20580 Richard B. Dagen, Esq., (through service upon) Chong S. Park, Esq. Bureau of Competition Federal Trade Commission 601 New Jersey Avenue, NW, Rm. NJ-6213 Washington, DC 20001

I also certify that on April 21, 2003, I also caused one copy of the foregoing motion to be served by U.S. mail upon:

David W. Beehler, Esq. Robins, Kaplan, Miller & Ciresi, LLP 2800 LaSalle Plaza 800 LaSalle Avenue Minneapolis, MN 55402-2015

Jeffrey P. Kehne	