UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

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

NON-PARTY REFINERS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO MOVE FOR IN CAMERA TREATMENT OF HEARING EXHIBITS DESIGNATED BY COMPLAINT COUNSEL

Non-parties BP West Coast Products LLC, Chevron USA, Inc., Equilon Enterprises LLC d/b/a Shell Oil Products (US), Exxon Mobil Corporation, Motiva Enterprises LLC, and Shell Oil Company (collectively, "the non-party refiners") file this motion to extend the time permitted for them to move for *in camera* treatment of documents and deposition excerpts that Complaint Counsel have designated for possible introduction at the hearing in the above-referenced matter.

Complaint Counsel provided notice of the documents and deposition excerpts that it may introduce at the hearing by letter dated September 24, 2003. The attachments to its letter list more than 400 trial exhibits and excerpts from 20 depositions that were previously designated for confidential treatment under the Protective Order.

Under the terms of the April 9, 2003, Scheduling Order, as modified by the Order of August 5, 2003, the current deadline for non-party refiners to move for *in camera* treatment of materials designated for introduction at the hearing is October 10, 2003. Employees of the non-party refiners, in consultation with undersigned counsel, are in the process of examining the documents and deposition excerpts that Complaint Counsel has identified. We will soon be in a position to enter into discussions with Complaint Counsel for the purpose of reaching agreement, to the greatest extent possible, on issues of *in camera* treatment for these materials. In view of

the quantity of material that Complaint Counsel has designated that pertains to the operations of

the non-party refiners (much of which contains potentially business sensitive information) and

the need for careful scrutiny to minimize the number of documents for which in camera

treatment is sought, additional time will be required to complete this process. The non-party

refiners therefore request an extension of fourteen days, to and including October 24, 2003, of

the deadline for any motion for in camera treatment of documents designated by Unocal for

possible introduction at the hearing.

We have discussed this request in telephone conversations with Complaint Counsel and

counsel for Unocal. Complaint counsel has represented that it concurs in our view that the

additional time will assist efforts to minimize the number of documents for which in camera

treatment may be sought. Both Complaint Counsel and counsel for Unocal have indicated that

they do not oppose this extension request.

DATED: October 9, 2003

Respectfully submitted,

Donald B. Craven

AKIN GUMP STRAUSS HAUER &

FELD, LLP

1333 New Hampshire Ave., NW

Washington, DC 20036

2

UNITED STATES OF AMERICA BEFORE FEDERAL TRADE COMMISSION

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

[PROPOSED] ORDER MODIFYING SCHEDULING ORDER DEADLINE FOR THE FILING OF MOTIONS SEEKING IN CAMERA TREATMENT

Upon consideration of the Non-Party Refiners' Unopposed Motion For Extension Of Time To Move For *In Camera* Treatment Of Hearing Exhibits Designated By Complaint Counsel, it is hereby ordered that the movants shall be given until October 24, 2003, to file a motion seeking *in* camera treatment of documents and deposition excerpts identified in Complaint Counsel's September 24, 2003, lists.

The Honorable D. Michael Chappell Administrative Law Judge

CERTIFICATE OF SERVICE

I certify that on October 9, 2003, I caused an original and two copies of the Non-Party Refiners' Unopposed Motion For Extension Of Time To Move For In Camera Treatment Of Hearing Exhibits Designated By Complaint Counsel 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 October 9, 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 October 9, 2003, I 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 October 9, 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	