UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION WASHINGTON D.C.

In the Matter of

UNION OIL COMPANY OF CALIFORNIA, a corporation.

Docket No. 9305

MEMORANDUM IN SUPPORT OF UNOCAL'S MOTION FOR IN CAMERA TREATMENT OF DOCUMENTS CONTAINING CONFIDENTIAL BUSINESS INFORMATION THAT COMPLAINT COUNSEL IDENTIFY AS POTENTIAL HEARING EXHIBITS

hereby joins in, and requests that Your Honor grant,
Unocal's Motion for *in Camera* Treatment of Documents Containing Confidential Business
Information That Complaint Counsel Identify as Potential Hearing Exhibits, which
understands is being filed today. entered into a license agreement with Unocal on

. It is understanding that this license agreement has been proposed to be used as trial

. It is understanding that this license agreement has been proposed to be used as trial exhibit CX 2012 and/or trial exhibit RX 2012, and that it is one of the documents for which *in camera* treatment is being sought by Unocal's motion. The terms of this licensing agreement, as well as even identity as a licensee, have been treated by both Unocal and as confidential, and maintaining the confidentiality of that information is very important to . Therefore, has taken extensive measures to protect the confidentiality of that license

agreement and its identity as a licensee. would suffer material injury if this information,

including the mere fact that is a Unocal licensee, were disclosed to the public.

Dated: October 15, 2003

WOODCOCK WASHBURN LLP

Signature on File with Commission

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COUNSEL FOR