UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

Docket No. 9305

Union Oil Company of California, a corporation.

COMPLAINT COUNSEL'S UNOPPOSED MOTION FOR ADDITIONAL EXTENSION OF TIME FOR FILING OF REPLY BRIEFS AND FINDINGS

In light of recent developments relating to ChevronTexaco's proposed acquisition of Unocal, and the Commission's review of this merger, Complaint Counsel hereby move the Court for a sixty (60) day extension of time – until July 11, 2005 – for the filing of reply briefs and findings in the above-captioned matter. Counsel for Unocal does not oppose this motion.

Currently, the parties are scheduled to file reply briefs and findings on May 11, 2005. The additional extension of time will permit Complaint Counsel to assist other staff of the Commission in reviewing ChevronTexaco's proposed acquisition and to assist in analyzing – and potentially resolving – any issues relating to ChevronTexaco's acquisition of Unocal's RFG patents. In light of these developments, a sixty (60) day extension of time would also permit Complaint Counsel to discuss with the parties to the proposed acquisition the possibility of resolving the ongoing litigation.

Accordingly, Complaint Counsel respectfully request that the Court grant an additional extension of time until July 11, 2005 for the filing of reply briefs and findings.

Respectfully submitted,

Chong S. Park

David Conn

Peggy Bayer Femenella

Lisa Fialco

Dean Graybill

Sean Gates

John Roberti

Lore Unt

Counsel Supporting the Complaint

Bureau of Competition Federal Trade Commission Washington, D.C. 20580

Dated: April 19, 2005

UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of	Docket No. 9305
Union Oil Company of California, a corporation.	
[PROPOSED] ORDER GRANTING COMPLA MOTION FOR ADDITIONAL EXTENSION OF BRIEFS AND FIND	F TIME FOR FILING OF REPLY
Complaint Counsel's unopposed motion for an a	dditional extension for the filing of reply
briefs and findings in this matter is hereby GRANTED.	The parties shall file reply briefs and
findings on July 11, 2005.	
	So ordered.
	Hon. D. Michael Chappell

CERTIFICATE OF SERVICE

I, Terri Martin, hereby certify that on April 19, 2005, I caused Complaint Counsel's Unopposed Motion for Additional Extension of Time for Filing of Reply Briefs and Findings to be served upon the below listed persons:

VIA HAND DELIVERY TO:

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

VIA FACSIMILE & FEDERAL EXPRESS TO:

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

Joseph Kattan, Esq. Gibson, Dunn & Crutcher LLP 1050 Connecticut Avenue, NW Washington, DC 20036-5306

 Terri Martin	