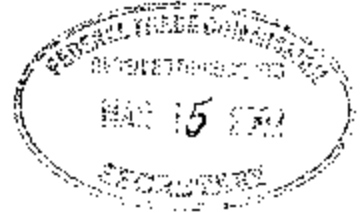


UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION



In the Matter of)
)
)

MSC SOFTWARE CORPORATION,)
a corporation,)
)

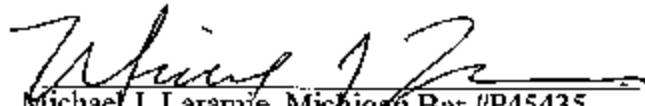
Docket No. 9299

NOTICE OF APPEARANCE

I, Michael J. Laramie, of the firm Bodman, Longley & Dahling LLP, hereby enter my appearance as counsel for third party Lear Corporation for the purpose of responding to the Subpoena Duces Tecum to Lear Corporation issued on February 5, 2002.

I was admitted to practice law before the Supreme Court of the State of Michigan and all lower courts in November 1991 and have been licensed to practice law continuously by the State Bar of Michigan since that time. The State Bar of Michigan has assigned me identification number P45435. I am also admitted to practice in the United States Court of Appeals for the Sixth Circuit and the United States District Courts for the Eastern and Western Districts of Michigan.

Respectfully submitted,


Michael J. Laramie, Michigan Bar #P45435
BODMAN, LONGLEY & DAHLING LLP
201 W. Big Beaver Road, Suite 500
Troy, MI 48084
(248) 743-6000

March 8, 2002

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION**

)

In the Matter of)

)

Docket No. 9299

MSC.SOFTWARE CORPORATION,)

a corporation,)

)

LEAR CORPORATION'S MOTION TO QUASH SUBPOENA DUCES TECUM

**Bodman, Longley & Dahling LLP
By: Michael J. Laramie (P45435)
Attorneys for Lear Corporation
201 W. Big Beaver Road, Suite 500
Troy, MI 48084
(248) 743-6000**

March 08, 2002
FTW 282880 1

LEAR CORPORATION'S MOTION TO QUASH SUBPOENA DUCES TECUM

Pursuant to 16 CFR 3.34(c), Lear Corporation ("Lear") by its attorneys, Bodman, Longley & Dahling LLP, moves for entry of an order quashing the subpoena duces tecum issued February 5, 2002 and served on Lear by mail on February 22, 2002. In support of its motion, Lear states:

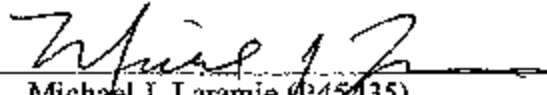
1. The subpoena imposes an enormous burden on Lear, for the following reasons:
 - a. The geographic scope of the subpoena is the world. Lear operates facilities located in thirty-three countries on six continents.
 - b. The subpoena requests production of all "documents and information dated, generated, received, or in effect for a period in excess of five (5) years, i.e., after January 1, 1997.
 - c. The subpoena describes the documents requested in the broadest of terms, based primarily on information that might be contained in the documents, rather than the type of document, i.e., purchase order, invoice, engineering report, etc. To determine whether Lear has documents responsive to the document descriptions set forth in the subpoena would require substantial time and effort on the part of numerous Lear employees.
 - d. The subpoena, served on February 22, 2002, requires production of the requested documents within a very short time, i.e., by March 20, 2002.

2. As required by 16 CFR 3.22(f), counsel for Lear has conferred with counsel for MSC.Software Corporation to attempt to resolve the issues raised herein. Because of the limited time period established by 16 CFR 3.34(e) for Lear to file this motion, counsel were not able to reach an agreement. Counsel for Lear spoke to counsel for MSC.Software Corporation on Tuesday, March 5, 2002 and left a phone message for MSC.Software Corporation's counsel on Thursday, March 7, 2002.

WHEREFORE, Lear requests that the administrative law judgment issue an order quashing the subpoena duces tecum and awarding Lear all costs incurred in responding to the subpoena, including attorneys fees.

Respectfully submitted,

BODMAN, LONGLEY & DAHLING LLP

By: 
Michael J. Laramie (P45435)
201 W. Big Beaver Road, Suite 500
Troy, MI 48084
(248) 743-6000
Attorneys for Defendant

March 08, 2002

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

In the Matter of)
)
)

MSC.SOFTWARE CORPORATION,)
a corporation,)
)

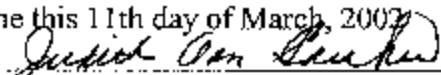
Docket No. 9299

PROOF OF SERVICE

STATE OF MICHIGAN)
) SS.
COUNTY OF OAKLAND)

JoAnn D. Brookshire, being duly sworn upon oath deposes and states that she did serve by FEDERAL EXPRESS on March 11, 2002 APPEARANCE, LEAR CORPORATION'S MOTION TO QUASH SUBPOENA DUCES TECUM and this PROOF OF SERVICE upon Hon. James P. Timony, 600 Pennsylvania Avenue, Room 112, Washington, DC 20580 and upon Richard Dagen, Esq., Assistant Director, Anti Competitive Practices, Federal Trade Commission, 600 Pennsylvania Avenue, Washington, DC 20580.


JoAnn D. Brookshire

Subscribed and sworn to before
me this 11th day of March, 2002

Notary Public, Oakland County, MI
My Commission Expires: 4-3-06

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

In the Matter of)
)
)


MSC SOFTWARE CORPORATION,)
a corporation,)
)


Docket No. 9299

PROOF OF SERVICE

STATE OF MICHIGAN)
) SS.
COUNTY OF OAKLAND)

JoAnn D. Brookshire, being duly sworn upon oath deposes and states that she did serve by FEDERAL EXPRESS on March 12, 2002 APPEARANCE, LEAR CORPORATION'S MOTION TO QUASH SUBPOENA DUCES TECUM and this PROOF OF SERVICE upon Hon. D. Michael Chappell, 600 Pennsylvania Avenue, Room 112, Washington, DC 20580.


JoAnn D. Brookshire

Subscribed and sworn to before
me this 12th day of March, 2002

Notary Public, Oakland County, MI
My Commission Expires: 7-31-05

KATHLEEN E. BOOMS
Notary Public, Oakland County, MI
My Commission Expires: July 31, 2005