UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSIO

COMMISSIONERS: Joseph Simons, Chairman

Maureen Ohlhausen

Rohit Chopra Noah Phillips Rebecca Slaughter



In the Matter of

Tronox Limited a corporation,

National Industrialization Company (TASNEE)

a corporation,

National Titanium Dioxide Company Limited (Cristal) a corporation,

And

Cristal USA Inc. a corporation.

Docket No. 9377

RESPONDENTS' CERTIFICATION REGARDING MOTION TO STAY AND TEMPORARILY WITHDRAW THIS MATTER FROM ADJUDICATION

I certify that before filing Respondents' Motion to Stay and Temporarily Withdraw this Matter from Adjudication on Monday, May 7, 2018, I conferred in good faith with Complaint Counsel in an effort to resolve the matters addressed in the motion. The parties were unable to reach an agreement.

Dated: May 8, 2018

Respectfully Submitted By:

/s/ Michael F. Williams, P.C.
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ATTORNEYS FOR TRONOX LIMITED

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 8, 2018, I caused a true and correct copy of the foregoing Certification regarding Respondent's Motion to Stay and Temporarily Withdraw This Matter from Adjudication to be served via e-mail upon the following:

D. Michael Chappell (oalj@ftc.gov) Chief Administrative Law Judge 600 Pennsylvania Ave., NW Suite 110 Washington, DC, 20580

Donald S. Clark (DCLARK@ftc.gov) Federal Trade Commission Office of the Secretary 600 Pennsylvania Avenue NW Washington, DC 20580

Chuck Loughlin (cloughlin@ftc.gov) Dominic Vote (dvote@ftc.gov) Federal Trade Commission 600 Pennsylvania Avenue NW Washington, DC 20580

Seth J. Wiener (Seth.Wiener@apks.com)
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Ryan Z. Watts (Ryan.Watts@apks.com)
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Arnold & Porter Kaye Scholer LLP
601 Massachusetts Avenue NW
Washington, DC 20001

/s/ Michael F. Williams, P.C. Michael F. Williams, P.C.

Notice of Electronic Service

I hereby certify that on May 08, 2018, I filed an electronic copy of the foregoing Respondents' Certification Regarding Motion to Stay & Temporarily Withdraw Matter from Adjudication, with:

D. Michael Chappell Chief Administrative Law Judge 600 Pennsylvania Ave., NW Suite 110 Washington, DC, 20580

Donald Clark 600 Pennsylvania Ave., NW Suite 172 Washington, DC, 20580

I hereby certify that on May 08, 2018, I served via E-Service an electronic copy of the foregoing Respondents' Certification Regarding Motion to Stay & Temporarily Withdraw Matter from Adjudication, upon:

Seth Wiener Arnold & Porter Kaye Scholer LLP seth.wiener@apks.com Respondent

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Alicia Burns-Wright Attorney Federal Trade Commission aburnswright@ftc.gov Complaint

I hereby certify that on May 08, 2018, I served via other means, as provided in 4.4(b) of the foregoing Respondents' Certification Regarding Motion to Stay & Temporarily Withdraw Matter from Adjudication, upon:

Seth Weiner Arnold & Porter Kaye Scholer LLP Respondent

 $\frac{Andrew\ Pruitt}{Attorney}$