

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

UNION OIL COMPANY OF CALIFORNIA, a
corporation.

DOCKET NO. 9305

STIPULATION FOR MODIFICATION OF SUBPOENA DUCES TECUM SERVED ON JACOBS
CONSULTANCY INC. (FORMERLY PACE CONSULTANTS) AND FOR AN EXTENSION OF THE
DATE TO RESPOND

Complaint Counsel and non-party Jacobs Consultancy Inc. (formerly Pace Consultants)

("Jacobs") hereby stipulate and agree as follows:

- A. The return date for the Subpoena *Duces Tecum* served on Jacobs Consultancy on March 17, 2003 is extended to April 30, 2003.
- B. Jacobs Consultancy shall be considered the subpoenaed party.
- C. The Specifications shall be modified as follows:
 1. Specification No. 6 shall be modified to read:
 6. All draft and final reports prepared in connection with your work for or retention by Unocal, excluding written communications between counsel and experts (such as written drafts of expert reports and written drafts of exhibits) prepared in connection with this litigation, *In the Matter of Union Oil Company*, Docket No. 9305.
 2. Specification No. 18 shall be modified to read:
 18. All documents relating to competition in the manufacture or sale of gasoline in California, including, but not limited to, market studies, forecasts and surveys, and all other documents relating to (a) the market share or competitive position of the company or any of its competitors; (b) the relative strength or weakness of companies producing or selling gasoline in California; (c) supply and demand conditions; (d) attempts by one competitor in the market for the manufacture or sale of gasoline in California to win customers from other companies; (e) allegations by any person that any company that manufactures or sells gasoline in California is not behaving in a competitive manner, including, but not limited to, customer and competitor complaints, threatened, pending, or completed

lawsuits, and federal and state investigations; and (f) any actual or potential effect on the supply, demand, cost or price of gasoline in California as a result of competition from any other possible substitute product.

- D. Documents that relate exclusively to Jacobs' discussions with Unocal regarding crude oil evaluation and/or petroleum coke shall be excluded from Jacobs' production.
- E. Jacobs shall be entitled to give notice to its clients of the potential disclosure of confidential and competitively-sensitive documents and Jacobs clients shall have 10 days from receipt of such notice to object to the production of such documents.

Dated: March 26, 2003

By /s/ J. Robert Robertson
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ATTORNEYS FOR JACOBS CONSULTANCY INC.

COMPLAINT COUNSEL

SO ORDERED:

D. Michael Chappell
Administrative Law Judge