

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7A(c)(4)  
Where FTC approval  
is required, the  
acquisition seems  
to fall within the  
exception.  
See earlier  
letter for  
detailed  
response  
Eric

March 14, 1991

Eric Elmore, Esq.  
Federal Trade Commission  
Premerger & Notification Office  
6th & Pennsylvania Avenue N.W.  
Washington, D.C. 20580

Re: Hart-Scott-Rodino Antitrust Improvements Act of 1976

Dear Mr. Elmore:

This will acknowledge our telephone conversation of this morning during the course of which you advised me that our client's acquisition of certain subsidiaries of [REDACTED]

for which the Resolution Trust Corporation is acting as receiver, is an exempt transaction under the provisions of Section 7A(c)(4) of the Clayton Act as a transfer from a Federal Agency, so long as the transaction is subject to the approval of the Resolution Trust Corporation.

Thank you for your assistance.

Very truly yours,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

March 14, 1991  
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I spoke this morning with Eric Elmore, Esq., a lawyer in the Federal Trade Commission's Premerger & Notification Office in Washington, D.C. Mr. Elmore called me in response to my letter of March 8, 1991 in which I requested advice as to whether the acquisition of certain subsidiaries of [REDACTED] was exempt from the preacquisition notification filing requirements of the Hart-Scott-Rodino Antitrust Improvements Act of 1976 which amended the Clayton Act by adding Section 7(A) thereto (the "Act").

Mr. Elmore advised me that so long as the transaction is subject to the approval of the Resolution Trust Corporation, it is exempt under Section 7A(c)(4) of the Act as a "transfer . . . from a Federal agency."

Very truly yours,  
[REDACTED]

[REDACTED]

cc: Eric Elmore, Esq.  
Federal Trade Commission  
Premerger & Notification Office  
6th & Pennsylvania Avenue N.W.  
Washington, D.C. 20580