

by teletype

=CONFIDENTIAL=

June 16, 1993

Premerger Notification Office  
Bureau of Competition  
Federal Trade Commission  
Washington D.C. 20580  
Phone: 202-326-3100  
Fax : 202-326-2050

*R. Horton Hy Rubenstein*



*802.20*

JUN 16 6 00 AM '93

FEDERAL TRADE  
COMMISSION  
PREMERGER NOTIFICATION  
OFFICE

Subject: [redacted] share purchase of its minority-owned  
U.S. joint venture company

Dear Sirs,

We, [redacted]  
would like to know whether a premerger notification is  
required to file with your offices and Department of Justice  
or not under the Hart Scott Rodino Act, with respect to the  
planned share purchase as described below. Please kindly  
inform us of your advice.

1. In 1987, [redacted]  
[redacted] hereinafter called [redacted]  
established a 49%-51% joint venture corporation, named  
[redacted] with a paid-in capital of \$2,500,000.  
[redacted] has owned 49% and [redacted] has owned 51% shares of [redacted].  
In the year of establishment, [redacted] had \$37,000 in the net  
sales, and \$2,661,000 in the total asset.
2. At present, [redacted] has \$22,778,000 in the net sales and  
\$17,339,000 in the total assets. It's paid-in capital is  
\$15,000,000.
3. [redacted] with the consolidated net sales of 13,961  
million and the consolidated total assets of 14,770  
million is planning to purchase 46% shares of [redacted] from  
[redacted] at the price of approximately \$6 million and  
raise its equity at CBC from 49% to 95%.
4. Should [redacted] make a premerger notification?

1 P. 6 [redacted]

[redacted]

[redacted] FROM

If any additional information is necessary, please let me know. Since we have not yet retained a U.S. law firm, please provide your advise, or question directly to me by fax or letter.

Thank you in advance for your cooperation.

Sincerely yours,

[REDACTED]

[REDACTED] called HDR on 6-18-93.  
Confirmed that figures in FP2  
are latest, and total holdings  
will be less than \$15MM.  
Except - 802.20 (b)  
HDR.  
IR) CONCURS