

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.:
	)	Filed:
ASSOCIATION OF RETAIL TRAVEL AGENTS,	)	
	)	
Defendant.	)	
_____	)	

STIPULATION

It is stipulated by and between the undersigned parties, by their respective attorneys, that:

1. The Court has jurisdiction over the subject matter of this action and over each of the parties thereto, and venue of this action is proper in the District of Columbia;

2. The parties consent that a Final Judgment in the form hereto attached may be filed and entered by the Court, upon the motion of any party or upon the Court's own motion, at any time after compliance with the requirements of the Antitrust Procedures and Penalties Act (15 U.S.C. § 16), and without further notice to any party or other proceedings, provided that plaintiff has not withdrawn consent, which it may do at any time before the entry of the proposed Final Judgment by serving notice thereof on defendant and by filing that notice with the Court;

3. Defendant shall abide by and comply with the provisions of the Final Judgment pending entry of the Final Judgment;



4. This Stipulation and the Final Judgment to which it relates are for settlement purposes only and do not constitute an admission by defendant in this or any other proceeding that Section 1 of the Sherman Act, 15 U.S.C. § 1, or any other provision of law has been violated;

5. In the event plaintiff withdraws its consent or if the proposed Final Judgment is not entered pursuant to this Stipulation, this Stipulation shall be of no effect whatever, and the making of this Stipulation shall be without prejudice to any party in this or any other proceeding.

Dated:

FOR PLAINTIFF UNITED STATES  
OF AMERICA:

Anne K. Bingaman  
Assistant Attorney General

Robert E. Litan  
Deputy Asst. Attorney General

Mark C. Schechter  
Deputy Director of Operations

FOR DEFENDANT ASSOCIATION OF  
RETAIL TRAVEL AGENTS:

Alexander Anolik  
A Professional Law Corporation

By: \_\_\_\_\_



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Roger W. Fones

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Mary Jean Moltenbrey

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Robert D. Young  
DC Bar #248260

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Nina B. Hale  
Attorneys

U.S. Department of Justice  
Antitrust Division  
Transportation, Energy, and  
Agriculture Section  
555 Fourth Street, N.W.  
Washington, D.C. 20001  
(202) 307-6318