

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiffs,	)	Civil No: 03 C 2528 (J. Zagel)
	)	
v.	)	
	)	
UPM-KYMMENE, OYJ, et al.,	)	
	)	
Defendants.	)	
	)	

**STIPULATION**

Plaintiff United States and Defendants hereby stipulate to the following:

1. Each party will provide at least 48 hours notice to other parties in this action of:
  - A. Witnesses whose testimony (live or by deposition) will be offered at the hearing; and
  - B. Exhibits to be introduced into evidence or used with a party's presentation of direct or redirect testimony.
  
2. No notice of an intent to use an exhibit is required for any exhibit that a party plans to use during cross-examination.
  
3. Each party will provide at least 72 hours notice to other parties in this action before use of any demonstrative exhibits. Any objection to use of a demonstrative exhibit must be made within 36 hours of receiving notice to allow the proponent time to correct anything to which the proponent believes there is a valid objection.
  
4. The following format and procedure shall be used to designate deposition testimony to be provided to the Court:
  - A. All depositions shall be saved using Microsoft Word.
  
  - B. Depositions should be opened in Word from their native files as provided by the court reporting service and then saved directly as Word files.

- C. Plaintiff is responsible for registering all designations in the depositions it noticed and Defendants are responsible for registering all designations in the depositions they noticed.
- D. Designations will be reflected by using Microsoft Word's highlight feature to indicate the designated portions. Plaintiffs' designations will be highlighted in yellow; Defendants' designation will be light blue; and overlapping designations selected by both sides will be highlighted in pink.
- E. After each side has completed its assigned designations, depositions will be exchanged on disk for review by the other side. Any corrections will be made directly to the file by opposing counsel, but opposing counsel shall also generate a list of all corrections made and provide the list to the other side.
- F. The parties will save each file by the witness's name and the date of the deposition: for example, Smith - 03.17.03 (including leading zeros for single digit days and months).
- G. Once this process is completed, each side, for each deposition that it noticed, will collect the final drafts, color print them, and file hard copies and electronic copies with the Court.

Dated: June 5\_\_\_\_, 2003

FOR PLAINTIFF UNITED STATES:

\_\_\_\_\_/s/\_\_\_\_\_  
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Respectfully submitted,  
FOR DEFENDANTS UPM-KYMMENE  
OYJ AND RAFLATAC, INC.:

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FOR DEFENDANTS BEMIS COMPANY,  
INC. AND MORGAN ADHESIVES  
COMPANY:

\_\_\_\_\_/s/\_\_\_\_\_  
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