UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

)

)

)

)

UNITED STATES OF AMERICA, *Plaintiff,* v. NORTHWEST AIRLINES CORP. and CONTINENTAL AIRLINES, INC. *Defendants.*

Civil Action No. 98-74611 Judge Denise Page Hood Magistrate Judge Scheer

UNITED STATES' MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff, the United States, respectfully requests that the Court, pursuant to Fed. R. Civ.

P. 26(c)(7), enter the attached, proposed Protective Order for the reasons stated in plaintiff's

accompanying memorandum. In support of this motion, plaintiff certifies that, as the

accompanying brief shows, it has made a reasonable effort to reach agreement with defendants

on the subject of this motion.

April 9, 1999

Respectfully submitted,

Julia C. Pidgeon Assistant United States Attorney Pa. Atty. Lic. 37949 211 W. Fort Street, Suite 2001 Detroit, MI 48226 (313) 226-9772 "/s/"

James R. Wade Jill A. Ptacek Michael D. Billiel Trial Attorneys Department of Justice Antitrust Division 325 Seventh Street, N.W. Suite 500 Washington, D.C. 20530 (202) 353-8730