

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA) Criminal No. 00-033
)
v.) Judge Marvin Katz
)
MITSUBISHI CORPORATION,) Violations: 15 U.S.C. § 1 and 18 U.S.C. § 2 (a)
)
Defendant.) Filed: 02-06-01

**MEMORANDUM OF THE UNITED STATES IN RESPONSE
TO DEFENDANTS MOTION CONCERNING COLLUSION
BY JAPANESE MANUFACTURERS IN THE 1980'S**

The United States intends to limit its questioning of Robert Krass to his knowledge concerning Mitsubishi and its role in aiding and abetting the conspiracy. Accordingly, the Government does not oppose the defendant's motion.

The Government notes, however, that it has been the defendant which has introduced evidence of "rumors" of price-fixing in the 1980's. Should the defendant pursue this area on cross-examination of Mr. Krass, the Government does intend to address his knowledge on this subject on redirect.

Dated:

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CERTIFICATE OF SERVICE

This is to certify that on the day of 6th February 2001, a copy of the Memorandum of the United States In Response to Defendants Motion Concerning Collusion by Japanese Manufacturers in the 1980's has been hand delivered to counsel of record for the defendant as follows:

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