

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	Civil Action No. 1:98CV02763
	:	Judge Kollar-Kotelly
v.	:	
	:	
CHANCELLOR MEDIA	:	
CORPORATION	:	
	:	
and	:	
	:	
KUNZ & COMPANY,	:	
	:	
Defendants.	:	

**MOTION FOR ENTRY OF
STIPULATION AND ORDER**

Plaintiff moves the Court for entry of the Stipulation and Order filed today in this civil antitrust merger case on the following grounds:

1. Plaintiff filed a Complaint today challenging a proposed acquisition of Kunz & Company (“Kunz”) by Chancellor Media Corporation (“Chancellor”). At the same time, plaintiff filed a proposed Final Judgment that would settle the claims in the Complaint by requiring the divesture of certain assets by the defendants.

2. In the Stipulation and Order, defendants have agreed to abide by and comply with all the terms and provisions of the proposed Final Judgment pending its entry after compliance with the requirements of the Antitrust Procedures and Penalties Act, 15 U.S.C.

§ 16. Defendants also have agreed not to consummate their transaction before the entry of the Stipulation and Order.

3. Defendants have authorized plaintiff to state that they concur in this motion.

4. Plaintiff now moves for entry of the Stipulation and Order to permit the defendants to consummate their transaction.

Dated: November 12, 1998

Respectfully Submitted,

/S/

Barry L. Creech
D.C. Bar No. -- 421070

U.S. Department of Justice
Antitrust Division
Merger Task Force
1401 H St. NW, Suite 4000
Washington, DC 20530
(202) 307-0001

Certificate of Service

I, Barry L. Creech, hereby certify that, on November 12, 1998, I caused the foregoing document to be served on defendants Kunz & Company and Chancellor Media Corporation by having a copy mailed, first- class, postage prepaid, to:

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/S/

Barry L. Creech
D.C. Bar No. - 421070