

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

SINCLAIR BROADCAST GROUP, INC.;
RAYCOM MEDIA, INC.;
TRIBUNE MEDIA COMPANY;
MEREDITH CORPORATION;
GRIFFIN COMMUNICATIONS, LLC;
and
DREAMCATCHER BROADCASTING,
LLC,

Defendants.

Case No. 1:18-cv-2609

UNITED STATES' EXPLANATION OF CONSENT DECREE PROCEDURES

The United States submits this short memorandum summarizing the procedures regarding the Court's entry of the proposed Final Judgments. These Judgments would settle this case pursuant to the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16(b)-(h) (the "APPA"), which applies to civil antitrust cases brought and settled by the United States.

1. Today, the United States has filed a Complaint and, attached to this Explanation of Consent Decree Procedures, proposed Final Judgments and Stipulations and Orders between the United States and each defendant by which they have agreed that the Court may enter the proposed Final Judgments after the United States has complied with the APPA. The proposed Final Judgments and Stipulations and Orders are attached to the Explanation of Consent Decree Procedures as follows:

Defendant	Stipulation and Order	Proposed Final Judgment
Sinclair Broadcast Group, Inc.	Attachment 1	Attachment 2
Raycom Media, Inc.	Attachment 3	Attachment 4
Tribune Media Company	Attachment 5	Attachment 6
Meredith Corporation	Attachment 7	Attachment 8
Griffin Communications, LLC	Attachment 9	Attachment 10
Dreamcatcher Broadcasting, LLC	Attachment 11	Attachment 12

The United States has also filed a Competitive Impact Statement relating to the proposed Final Judgments.

2. The Stipulations and Orders are documents that have been agreed to by both the United States and the Defendants. The United States and the Defendants ask that the Court sign each of these Orders, which ensures that the Defendants preserve competition by complying with the provisions of the proposed Final Judgments during the pendency of the proceedings required by the Tunney Act. *See* 15 U.S.C. § 16(b)-(h).

3. The APPA requires that the United States publish the proposed Final Judgments and the Competitive Impact Statement in the *Federal Register* and cause to be published a summary of the terms of the proposed Final Judgments and the Competitive Impact Statement in certain newspapers at least sixty days prior to entry of the proposed Final Judgments. Defendants in this matter have agreed to arrange and bear the costs for the newspaper notices. The notice will inform members of the public that they may submit comments about the proposed Final Judgments to the United States Department of Justice, Antitrust Division, 15 U.S.C. § 16(b)-(c).

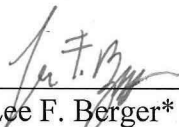
4. During the sixty-day period, the United States will consider, and at the close of that period respond to, any comments that it has received, and it will publish the comments and the United States' responses in the Federal Register.

5. After the expiration of the sixty-day period, the United States will file with the Court the comments and the United States' responses, and it may ask the Court to enter the proposed Final Judgments (unless the United States has decided to withdraw its consent to entry of the Final Judgments, as permitted by Paragraph 2 of each Stipulation, *see* 15 U.S.C. § 16(d)).

6. If the United States requests that the Court enter the proposed Final Judgments after compliance with the APPA, 15 U.S.C. § 16(e)-(f), then the Court may enter the Final Judgments without a hearing, provided that it concludes that the Final Judgments are in the public interest.

Dated: November 13, 2018

Respectfully submitted,



Lee F. Berger* (D.C. Bar #482435)
Trial Attorney
U.S. Department of Justice
Antitrust Division
Media, Entertainment, and Professional
Services Section
450 Fifth Street, N.W., Suite 4000
Washington, DC 20530
Phone: 202-598-2698
Facsimile: 202-514-7308
Email: Lee.Berger@usdoj.gov

*Attorney of Record