

**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;  
DREAMCATCHER BROADCASTING,  
LLC; NEXSTAR MEDIA GROUP, INC.;  
CBS CORPORATION; COX  
ENTERPRISES, INC.; THE E.W.  
SCRIPPS COMPANY; FOX  
CORPORATION; and TEGNA INC.,

*Defendants.*

Case No. 1:18-cv-2609-TSC

**UNITED STATES’ SECOND ADDITIONAL 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 regarding Defendants CBS Corporation (“CBS”), Cox Enterprises, Inc. (“Cox”), The E.W. Scripps Company (“Scripps”), Fox Corporation (“Fox”), and TEGNA Inc. (“TEGNA”). These Judgments would settle this case as to CBS, Cox, Scripps, Fox, and TEGNA 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. On August 1, 2019, the Court reopened this case “for the limited purpose of considering proposed final judgments with five new Defendants related to the same

conduct at issue in this case,” and granted leave to file the Second Amended Complaint. Minute Order (Aug. 1, 2019). The Second Amended Complaint was filed the same day. *See* Second Amended Complaint, Dkt. 48 (filed Aug. 1, 2019). Attached to this Second Additional Explanation of Consent Decree Procedures are the following documents, by which the United States and defendants CBS, Cox, Scripps, Fox, and TEGNA have agreed that the Court may enter the proposed Final Judgments after the United States has complied with the APPA:

Stipulation and Order as to CBS	<a href="#">Attachment 1</a>
Proposed Final Judgment as to CBS	<a href="#">Attachment 2</a>
Stipulation and Order as to Cox	<a href="#">Attachment 3</a>
Proposed Final Judgment as to Cox	<a href="#">Attachment 4</a>
Stipulation and Order as to Scripps	<a href="#">Attachment 4</a>
Proposed Final Judgment as to Scripps	<a href="#">Attachment 6</a>
Stipulation and Order as to Fox	<a href="#">Attachment 7</a>
Proposed Final Judgment as to Fox	<a href="#">Attachment 8</a>
Stipulation and Order as to TEGNA	<a href="#">Attachment 9</a>
Proposed Final Judgment as to TEGNA	<a href="#">Attachment 10</a>

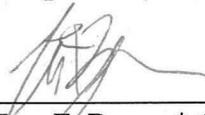
The United States has also filed today a Competitive Impact Statement relating to the proposed Final Judgments as to CBS, Cox, Scripps, Fox, and TEGNA, which is the same in all material respects to the Competitive Impact Statement the United States filed on November 13, 2018 except that it discusses CBS, Cox, Scripps, Fox, and TEGNA and the proposed Final Judgments as to these Defendants.

2. Each Stipulation and Order listed above is a document that has been agreed to by both the United States and the respective Defendant. The United States and each Defendant ask that the Court sign the Orders, which ensure that each Defendant preserves 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 United States incorporates by reference paragraphs 3-6 of the United States' Explanation of Consent Decree Procedures, Dkt. 2 (Nov. 13, 2018) ("First Explanation"), which apply in their entirety to the proposed Final Judgments and Stipulations and Orders as to CBS, Cox, Scripps, Fox, and TEGNA filed today. The filing today will start a new Tunney Act review period related to the proposed Final Judgments as to CBS, Cox, Scripps, Fox, and TEGNA as discussed in the First Explanation.

Dated: August 13, 2019

Respectfully submitted,



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