

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

NATIONAL ASSOCIATION OF
REALTORS®,

Defendant.

Case No. 1:20-CV-03356-TJK

**NOTICE OF WITHDRAWAL OF CONSENT TO
ENTRY OF PROPOSED FINAL JUDGMENT**

PLEASE TAKE NOTICE that, pursuant to Paragraph 2 of the Stipulation and Order entered by the Court on November 20, 2020 (Dkt. 5),¹ Plaintiff United States of America, by and through its attorneys of record, hereby withdraws its consent to entry of the proposed Final Judgment in the above-captioned matter.

After filing the Complaint and proposed Final Judgment, the United States sought Defendant's consent to amend the Reservation of Rights provision in Section XI of the proposed Final Judgment to eliminate any potential limitation on the future ability of the United States to

¹ Paragraph 2 states:

The Parties stipulate that the Final Judgment in the form attached as Exhibit A may be filed with and entered by the Court, upon the motion of the United States or upon the Court's own motion, after compliance with the requirements of the Antitrust Procedures and Penalties Act (15 U.S.C. § 16) ("APPA"), and without further notice to any party or other proceedings, provided that the United States has not withdrawn its consent. The United States may withdraw its consent at any time before the entry of the proposed Final Judgment by serving notice on Defendant and by filing that notice with the Court.

Stipulation and Order, Dkt. 5 at 1.

investigate and challenge additional potential antitrust violations committed by Defendant. Defendant declined to consent. As a result, the United States has chosen to exercise its right under Paragraph 2 of the Stipulation and Order to withdraw its consent to entry of the proposed Final Judgment.

Date: July 1, 2021

Respectfully submitted,

/s/ Owen M. Kendler

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