

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHANCELLOR MEDIA
CORPORATION

and

KUNZ & COMPANY,

Defendants.

Civil Action No. 1:98CV02763
Judge Kollar-Kotelly

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

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:

Steven H. Schulman
Bruce J. Prager
Latham & Watkins
1001 Pennsylvania Ave., NW
Suite 1300
Washington, DC 20004
Counsel for Chancellor Media Corporation

Riccarda Heising
Powell, Goldstein, Frazer & Murphy LLP
191 Peachtree Street, NE
16th Floor
Atlanta, GA 30603
Counsel for Kunz & Company

/S/

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