

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHANCELLOR MEDIA CORPORATION

and

WHITECO INDUSTRIES, INC.

and

METRO MANAGEMENT ASSOCIATES

Defendants.

Civil Action No. 1:98CV02876  
Judge Colleen Kollar-Koetelly

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 by Chancellor Media Corporation (“Chancellor”) of Whiteco Industries, Inc. and Metro Management Associates (collectively "Whiteco"). At the same time, plaintiff filed a proposed Final Judgment that would settle the claims in the Complaint by requiring the divestiture 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 25, 1998

Respectfully Submitted,

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/s/  
Renée Eubanks

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