

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

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 1:98CV02876
	:	Judge Colleen Kollar-Koetelly
CHANCELLOR MEDIA CORPORATION	:	
	:	
and	:	
	:	
WHITECO INDUSTRIES, INC.	:	
	:	
and	:	
	:	
METRO MANAGEMENT ASSOCIATES	:	
	:	
Defendants.	:	

**MOTION FOR ENTRY OF
STIPULATION AND ORDER**

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.

