

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

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UNITED STATES OF AMERICA, )  
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 )  
 Plaintiff, ) Civil Action No. 99-005 (MMS)  
 )  
 vs. )  
 )  
 DENTSPLY INTERNATIONAL, INC., )  
 )  
 Defendant. )  

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**PLAINTIFF UNITED STATES' MOTION TO COMPEL  
DEFENDANT DENTSPLY TO COMPLY WITH  
DISCOVERY RELATING TO ITS COMPETITIVE  
POSITION IN FOREIGN MARKETS**

Pursuant to Fed. R. Civ. P. 37(a) and D. Del. LR 7.1.1, the United States hereby moves for entry of the accompanying proposed Order compelling Defendant Dentsply International, Inc. to produce the requested information relating to its competitive position in foreign markets, as set forth in that Order and the United States' accompanying Brief. This Motion is made on the grounds that this information is directly relevant to the subject matter of this action, and therefore is within the scope of discovery under Fed. R. Civ. P. 26(b)(1), and that Defendant's refusal to comply is without justification, as set forth more fully in the accompanying Brief. Pursuant to D. Del. LR 7.1.1, the United States certifies that it has conferred in good faith with counsel for Defendant in an effort to resolve the dispute regarding this request for specific information.

Respectfully submitted,

COUNSEL FOR PLAINTIFF  
UNITED STATES OF AMERICA

CARL SCHNEE  
UNITED STATES ATTORNEY

/s/

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Dated: January 3, 2000