

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	Supplemental to
Petitioner,	)	Civil Action No. 93-2621 -- SS
	)	
v.	)	Judge Stanley Sporkin
	)	
SMITH INTERNATIONAL, INC. and	)	
SCHLUMBERGER LTD.	)	
	)	
Respondents.	)	
	)	
	)	

**DECLARATION OF ANGELA L. HUGHES IN SUPPORT OF UNITED STATES' PETITION FOR AN ORDER TO SHOW CAUSE WHY RESPONDENTS SMITH INTERNATIONAL, INC. AND SCHLUMBERGER LTD. SHOULD NOT BE FOUND IN CRIMINAL CONTEMPT**

I, Angela L. Hughes, declare as follows:

1. This is a declaration in support of a Petition by the United States for an Order to show cause why Respondents Smith International, Inc. and Schlumberger Ltd. should not be found in criminal contempt.

2. I am a Trial Attorney in the Antitrust Division of the United States Department of Justice. I was charged with the responsibility of proceeding against Smith and Schlumberger in the United States' Petition for criminal contempt. I was also charged with the responsibility of investigating Smith's request to modify the Final Judgment entered by this Court on April 12,

1994 and modified on September 19, 1996 in United States v. Baroid Corporation, et al., Civil Action No. 93-2621.

3. I have examined (a) certain relevant files and documents of the Department of Justice; (b) certain documents produced to the Department of Justice in response to Civil Investigative Demands issued to Smith International, Inc. and Schlumberger, Ltd.; and (c) correspondence and other materials sent to the Antitrust Division by counsel for these two companies. The Appendix to the United States' Petition contains documents from those sources. Exhibits 1 through 7 are pleadings filed in United States v. Baroid Corporation, et al., Civil Action No. 93-2621. Exhibit 8 is a document that counsel for Schlumberger Ltd. sent to the United States. Exhibits 9 through 13 are correspondence between the United States and counsel for Smith and Schlumberger.

4. Based upon the information that has been obtained from documents and files of the United States, documents submitted to the United States by Smith and Schlumberger, and correspondence between the United States and Smith and Schlumberger, I affirm that to the best of my knowledge and belief, the allegations and statements contained in the foregoing Petition are true and correct.

5. No previous application has been made for such an Order.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 27, 1999.

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/s/  
Angela L. Hughes  
Attorney for the United States