IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA, Plaintiff, v. STANDARD OIL COMPANY (NEW JERSEY) and POTASH COMPANY OF AMERICA, Defendants.	)	Civ. A. No. 954-64

JOINT MOTION TO ENTER ORDER TERMINATING FINAL JUDGMENT

1. Plaintiff United States of America ("United States") and Defendant Exxon Mobil Corporation ("Exxon Mobil"), the successor in interest to Defendant Standard Oil Company (New Jersey), move this Court pursuant to Fed. R. Civ. P. 60(b)(5) and (6) to enter an Order terminating the Final Judgment entered in the above-captioned matter on May 24, 1966 ("1966 Final Judgment").

2. The 1966 Final Judgment permanently enjoins Exxon Mobil from acquiring any financial interest in or merging with Potash Company of America, which no longer exists as a corporate entity.

3. Exxon Mobil published notice of its intention to seek termination of the Final Judgment in relevant trade publications *Green Markets* on March 16, 23, 30 and April 6, 2009, and *Fertecon* on March 17 and 31, 2009. All interested parties were invited to submit comments to the United States Department of Justice.

4. The United States has not received any comments.

5. The United States has conducted an extensive investigation into the likely effects of the proposed termination of the 1966 Final Judgment, and has interviewed both customers and

competitors in the potash market. None of the persons interviewed by the United States objected to terminating the 1966 Final Judgment.

The United States and Exxon Mobil Corporation request that this Court enter the Order Terminating Final Judgment, a copy of which is attached hereto.

Dated: December 23, 2009

Respectfully submitted,

s/ Dando B. Cellini

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