

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

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:  
UNITED STATES OF AMERICA, :  
:  
Petitioner, : Misc. Action No. 94-338 HHG  
:  
- v. - :  
:  
TIME WARNER, INC. :  
75 Rockefeller Plaza :  
New York, New York 10019, :  
:  
SONY CORPORATION OF AMERICA :  
1 Sony Drive :  
Park Ridge, New Jersey 07656, :  
:  
POLYGRAM HOLDING, INC. :  
Worldwide Plaza :  
825 Eighth Avenue :  
New York, New York 10019, :  
:  
EMI MUSIC :  
Carnegie Hall Tower :  
152 West 57th Street :  
New York, New York 10019, :  
:  
BERTELSMANN, INC. :  
1133 Avenue of the Americas :  
New York, New York 10019, :  
:  
MCA, INC. :  
100 Universal City Plaza :  
Universal City, California :  
91608, :  
:  
Respondents. :  
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**RESPONDENT SONY CORPORATION OF AMERICA'S ANSWER TO  
PETITION TO ENFORCE CIVIL INVESTIGATIVE DEMANDS**

Respondent, Sony Corporation of America ("Sony"), by its attorneys, Rosenman & Colin, as and for its Answer to the Petition to Enforce Civil Investigative Demands (the "Petition") answers the averments of the Petition as follows:

1. Admits that Petitioner is proceeding under the Antitrust Civil Process Act, but denies that it has jurisdiction to do so.

2. Admits that the United States Department of Justice ("DOJ") is authorized to issue CIDs pursuant to 15 U.S.C. §1312, but only where it has jurisdiction to do so.

3. Denies knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained in paragraph 3 of the Petition.

4. Denies each and every averment contained in paragraph 4 of the Petition.

5. Denies knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained in paragraph 5 of the Petition.

6. Denies knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained in paragraph 6 of the Petition.

7. Denies knowledge or information sufficient to form a belief as to the truth or falsity of the averments contained in paragraph 7 of the Petition.