

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

VERSO PAPER CORP., and  
NEWPAGE HOLDINGS INC.,

Defendants.

Case No. 1:14-cv-2216 (TSC)

**CERTIFICATE OF COMPLIANCE WITH PROVISIONS OF THE  
ANTITRUST PROCEDURES AND PENALTIES ACT**

Plaintiff United States of America, by the undersigned attorneys, certifies that it has complied with the provisions of the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16(b)-(h), and states:

1. The proposed Final Judgment and Competitive Impact Statement were filed on December 31, 2014;
2. Pursuant to 15 U.S.C. § 16(b), the proposed Final Judgment and Competitive Impact Statement were published in the *Federal Register* on January 14, 2015, *see* 80 Fed. Reg. 1957 (2015);
3. Pursuant to 15 U.S.C. § 16(c), a summary of the terms of the proposed Final Judgment and Competitive Impact Statement were published in *The Washington Post* on January 14, 15, 16, 19, 20, 21, and 22, 2015;

4. Pursuant to 15 U.S.C. § 16(g), Defendants filed with the Court on January 9, 2015, a description of communications by or on behalf of Defendants with any officer or employee of the United States concerning or relevant to the proposed Final Judgment;
5. The sixty-day comment period specified in 15 U.S.C. § 16(b) commenced on January 23, 2015, and ended on March 24, 2015;
6. The United States received two public comments on the proposed Final Judgment;
7. On May 18, 2015, the United States filed with the Court the two comments and its response. Pursuant to 15 U.S.C. § 16(d) and with the Court's authorization (May 19, 2015 Minute Order), the United States posted on the Antitrust Division's website at <http://www.justice.gov/atr/cases/verso.html> the two comments, the attachments to these comments, and its response;
8. On May 29, 2015, the United States published in the *Federal Register* the two comments, its response, and the above location on the Antitrust Division's website at which the attachments to the public comments are accessible, *see* 80 Fed. Reg. 30726 (2015);
9. Pursuant to the Hold Separate Stipulation and Order filed on December 31, 2014, and 15 U.S.C. § 16(e), the Court may enter the proposed Final Judgment after it determines that the proposed Final Judgment serves the public interest;
10. The United States' Competitive Impact Statement and Response to Public Comments demonstrate that the proposed Final Judgment satisfies the public interest standard of 15 U.S.C. § 16(e); and
11. The parties have now satisfied all the requirements of the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16(b)-(h), as a condition for entering the proposed Final

Judgment, and it is now appropriate for the Court to make the necessary public interest determination required by 15 U.S.C. § 16(e) and to enter the proposed Final Judgment.

Dated: June 1, 2015

Respectfully submitted,

/s/ Karl D. Knutsen

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