

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
PLAYMOBIL USA, INC.,)
)
 Defendant.)

CIVIL ACTION NO. _____

STIPULATION

It is stipulated by and between the undersigned parties, by their respective attorneys, that:

1. The parties to this Stipulation consent that a Final Judgment in the form attached may be filed and entered by the Court, upon any party's or the Court's own motion, at any time after compliance with the requirements of the Antitrust Procedures and Penalties Act (15 U.S.C. § 16), without further notice to any party or other proceedings, provided that plaintiff has not withdrawn its consent, which it may do at any time before entry of the proposed Final Judgment by serving notice on the defendant and by filing that notice with the Court.

2. If plaintiff withdraws its consent or the proposed Final Judgment is not entered pursuant to this Stipulation, this Stipulation shall be of no effect whatever and its making shall be without prejudice to any party in this or any other proceedings.

DATED:

FOR THE PLAINTIFF:

ANNE K. BINGAMAN
Assistant Attorney General

BRUCE K. YAMANAGA

ROBERT E. LITAN

ANDREW S. COWAN

MARK SCHECHTER

Attorneys, U.S. Department of Justice
Antitrust Division
Civil Task Force
1401 H Street, N.W., Room 3700
Washington, D.C. 20530
(202) 514-8368

REBECCA P. DICK

FOR THE DEFENDANT:

EUGENE J. MEIGHER
Counsel for Playmobil USA,
Inc.