

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF KENTUCKY**

UNITED STATES OF AMERICA)
)
 Plaintiff,)
)
 vs.)
)
 SUIZA FOODS CORPORATION)
)
 d/b/a Louis Trauth Dairy,)
 Land O' Sun Dairy, and)
 Flav-O-Rich Dairy, and)
 BROUGHTON FOODS COMPANY,)
)
 d/b/a Southern Belle Dairy)
)
 Defendants.)

Civil Action No.

**DECLARATION OF
AUTHENTICATION
OF GOVERNMENT'S
EXHIBIT**

I, Bichngoc V. Hoai, declare as follows:

1. I am a paralegal specialist employed by the Antitrust Division of the United States Department of Justice, assigned to the investigation of Suiza's proposed acquisition of Broughton since December 1998. My responsibilities have included the maintenance, preservation, and logging in of the documents and information received from Suiza and Broughton in response to the Department's Requests for Additional Information (15 U.S.C. §18a(e)). I have personal knowledge of the facts stated below and would be competent to testify to them in court.

2. Attached as Exhibit 13 to the Memorandum in Support of the Motion of the United States for a Preliminary Injunction is a true and correct copy of a summary chart prepared under my direction, and is based on information received

from Suiza and Broughton in response to the Department of Justice's Request for Additional Information, at Specification 5.

3. Specification 5(b) requested "the total volume in gallons and dollar value of (i) fluid milk, (ii) fluid milk in half pint containers, and (iii) fluid milk in quarter pint containers, that was shipped to school district destinations (i) less than 50 miles (ii) 50-100 miles (iii) 101-150 miles (iv) 151-200 miles and (v) more than 200 miles from each of the company's distribution point(s) or facility(ies);"

4. The summary chart was constructed by copying and adding together the 1998 sales of all milk delivered to schools at the various destination ranges from each distribution branch reflected in the response associated with Suiza's Land O' Sun and Louis Trauth dairies and Broughton's Southern Belle dairy. Because there were no instances of milk delivered to schools more than 100 miles from any such distribution branch, the chart reflects shipments only in the shorter ranges.

5. When the chart was completed, I personally compared it to the information provided by Suiza and Broughton in response to Specification 5 and found the chart to accurately reflect that information in all respects.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th day of March, 1999, at Washington, DC.

_____/s/_____
Bichngoc V. Hoai
Antitrust Division
UNITED STATES DEPARTMENT
OF JUSTICE