

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 1:22-cv-01401-MEA

GRUPO VERZATEC S.A. DE C.V.,
STABILIT AMERICA, INC., CRANE
COMPANY, and CRANE COMPOSITES,
INC.,

Defendants.

**JOINT MOTION FOR ADVANCEMENT OF THE
INITIAL STATUS CONFERENCE TO APRIL 14, 2022**

This action, brought by the Antitrust Division of the U.S. Department of Justice under Section 7 of the Clayton Act, 15 U.S.C. § 18, and Section 2 of the Sherman Act, 15 U.S.C. § 2, seeks to enjoin Grupo Verzatec, S.A. de C.V. from acquiring Crane Composites, Inc. Appearances have been entered for by counsel for all parties.

The Parties respectfully jointly move for an initial status conference on Thursday, April 14, 2022. Plaintiff also states that it is available April 13 or 15, 2022, and Defendants also state that they are available on all of Plaintiff's dates, at any earlier date, or at any time.

The Parties request that the date of the initial status conference be advanced from the currently set date of June 2, 2022, (ECF No. 4), because they will be requesting an expedited litigation schedule and trial date. This case is a merger litigation in which, the Parties agree, the matter should be concluded expeditiously. The Parties appreciate the demands on the Court's

calendar and believe that setting a case schedule as soon as reasonably possible would further the efficient litigation of this matter.

Since the Complaint was filed on March 17, 2022, (ECF No. 1), the Parties have been working expeditiously to prepare for litigation, including by agreeing on and submitting a Protective Order on March 30, 2022, which the Court granted the same day (ECF No. 24). In addition, for example, Plaintiff agreed to produce its Investigation Materials by April 8 (or within 10 days of entry of the Protective Order). Pursuant to instruction from the Court, Defendants filed their Answer on April 5, 2022, (ECF No. 27), prior to filing this motion.

The parties have also been diligently meeting and conferring on a case management order and have reached a number of agreements, although the Parties have yet to agree on a proposed trial date and other core scheduling issues, and remain in discussion on a number of issues in the proposed case management order. The Parties will file case management positions prior to the initial status conference.

The parties would therefore appreciate the opportunity to discuss scheduling with the Court on April 14, 2022, or as soon as practicable and convenient to the Court.

Respectfully submitted,
April 7, 2021

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