

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, )  
Plaintiff, )  
v. )  
RENAULT, INC.; PEUGEOT, INC.; ) Civil Action No. 154-164  
DOLPHIN MOTORS, INC.; )  
EASTERN AUTO DISTRIBUTORS, INC.; )  
and MAGNA MOTORS, INC., )  
Defendants. )  
File: June 29, 1962

STIPULATION

IT IS HEREBY STIPULATED by and between the parties hereto, by  
their respective attorneys, that:

(1) The attorneys for the defendants, in the event of, and immediately following, entry of the Final Judgment and Order pursuant to the stipulations filed herein on June 29, 1962 and June 29, 1962 will cause to be sent a letter by defendants Renault, Inc. and Peugeot, Inc. to each distributor with which they regularly do business (marked Exhibit A and attached hereto), and a letter by each defendant distributor to each dealer with which such defendant distributor regularly does business (marked Exhibit B and attached hereto).

(2) Neither the undertaking referred to in paragraph (1) hereof nor the letters to be sent pursuant thereto shall be deemed to operate as an admission by any of the parties with respect to any issue of fact or question of law; nor shall the said undertaking or the said letters be used or relied upon by any of the parties in any further litigation brought by the United States under the antitrust laws.

Dated: June 29, 1962

For the Plaintiff:

LEE LOEVINGER

Assistant Attorney General

JOHN V. LEDDY

HARRY G. SKLARSKY

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JOHN J. GALGAY

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Attorneys, Department of Justice

For the Defendants:

Hays, Busby, & Rivkin

Weil, Gotshal & Manges

by: DAVID BUSBY

by: MARSHALL BERGER

for the defendant RENAULT, INC.

for the defendants MAGNA MOTORS, INC.,  
DOLPHIN MOTORS, INC., and EASTERN  
AUTO DISTRIBUTORS, INC.

Coudert Bros.

by: Alexis C. Coudert

for the defendant PEUGEOT, INC.

EXHIBIT A

We are happy to advise you that and the  
distributors have worked out a settlement of the antitrust litigation  
instituted against us by the U. S. Department of Justice. In the course  
of working out that settlement, represented to  
the Department that it is its intention that distributors  
and dealers may sell and service other makes of automobiles. The Department  
on its part recognizes that we may insist that each distributor and dealer  
fairly and fully discharge his responsibility under the  
distributor or dealer franchise agreement.

EXHIBIT B

We are happy to advise you that and the  
distributors have worked out a settlement of the antitrust litigation  
instituted against us by the U. S. Department of Justice. In the course  
of working out that settlement, the defendants represented to the  
Department that it is their intention that dealers  
may sell and service other makes of automobiles. The Department on its  
part recognizes that we may insist that each dealer fairly and fully discharge  
his responsibility under the dealer franchise  
agreement.

UNITED STATES DISTRICT COURT  
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UNITED STATES OF AMERICA, }  
Plaintiff, }  
v. } Civil Action No. 154-164  
RENAULT INC.; PEUGEOT, INC.; DOLPHIN }  
MOTORS, INC.; EASTERN AUTO DISTRIBUTORS, } Filed: July 30, 1962  
INC.; and MAGNA MOTORS, INC., }  
Defendants. }

ORDER

Upon motion of the plaintiff herein, and without opposition by  
the defendants, it is hereby

ORDERED that subdivisions (e), (f), (g), (h) and (i) of paragraph  
20, all of paragraph 23, subdivisions (c) and (d) of paragraph 25  
of the complaint herein as amended, and such portions of the prayer  
for relief as relate thereto, be and the same hereby are dismissed  
without prejudice.

Dated: July 30, 1962

/s/ Wilfred Feinberg  
United States District Judge