

**UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,
Plaintiff,

v.

NATIONAL GUM & MICA CO, *et al.*,
Defendants.

1:20-mc- 489

(originally In Equity No. 40-276)

DECLARATION OF HELEN CHRISTODOULOU

I, HELEN CHRISTODOULOU, do hereby declare and state as follows:

1. I am an attorney admitted to practice in New York. I have been a Trial Attorney with the New York Office of the Antitrust Division, Department of Justice since 2006.

2. This Declaration is being submitted in support of the United States of America's Motion to Terminate A Legacy Antitrust Judgment in the above-captioned matter.

3. The statements made in this Declaration are based on the knowledge acquired by me in the performance of my official duties and in conjunction with factual research conducted by other attorneys and staff in the Antitrust Division.

4. In early 2018, the Department of Justice Antitrust Division implemented a program to review and, when appropriate, seek termination of older antitrust judgments in which parties were subjected to some type of affirmative obligation or express prohibition that did not have an expiration date. As part of this process, the Division researched the corporate status of entities subject to these older, legacy antitrust judgments.

5. For the judgment in this case, librarians of the Antitrust Division were instructed to research and confirm the corporate status of the corporate defendants. The librarians searched the following public sources to determine corporate status:

- a. A search of the New York Department of State Division of Corporations database. If the final judgment (as submitted to this Court) or other web search (see below) suggested incorporation information for a defendant in another state, the librarians also checked that state for corporate status.
- b. A search of the Encyclopedia of Associations and IRS Tax Exempt Organization Search, where such organizations or associations were subject to a judgment.
- c. A search of web-based resources for the existence (or succession) of the entity. In addition to general web-based searches, the search included research in one or more of the following resources:
 - i. Lexis and/or Westlaw (news, company, and/or litigation search);
 - ii. historical newspapers from Newsbank, ProQuest, and/or Newspapers.com; and
 - iii. historical company directories held by the Antitrust Division Library.

6. Based on the information provided to me by the librarians, I believe that the defendant no longer exists as a stand-alone entity. Defendant National Gum & Mica Company was renamed National Starch and Chemical in 1959. It was sold several times since then, including to Unilever in 1978, to Imperial Chemicals Industries PLC in 1997, to AkzoNobel in 2008, and then finally to Corn Products International Inc. in 2010, which was rebranded as Ingredion Incorporated in 2012. I contacted Janet Bawcom, the Senior Vice President / General Counsel of Ingredion Incorporated, regarding this judgment. On November 2, 2020, Ms. Bawcom confirmed that Ingredion Incorporated does not object to the termination of the above-captioned judgment. In addition, based on information provided to me by the librarians, it does

not appear that General Adhesive Manufacturing exists, as there do not appear to be any records of it after 1927. Finally, given the passage of time since the judgment was filed in 1927, the individual defendants are presumed to have passed away or retired.

Having reviewed this Declaration, I declare, under penalty of perjury that the foregoing is true and correct.

Dated: November 20, 2020
New York, New York

/s/ Helen Christodoulou
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