

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

UNITED STATES OF AMERICA,  
Plaintiff,

v.

BETHLEHEM STEEL CORP., *et al.*,  
Defendants.

1:20-mc-794

(Originally Civil Action No. 115-328)

**DECLARATION OF T. JAKOB SEBROW**

I, T. Jakob Sebrow, do hereby declare and state as follows:

1. I am a Trial Attorney with the Antitrust Division of the United States Department of Justice (“Antitrust Division”). I am admitted to practice in the State of New York and in this District.
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 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 Antitrust 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 Defendant Bethlehem Steel Corp. (“Bethlehem”) declared bankruptcy in 2001, sold its assets in 2003, and is no longer in business. I also believe that Defendant The Youngstown Sheet and Tube Co., (“Youngstown”) no longer exists. In 1981, Youngstown merged with Jones & Laughlin Steel in 1981 to become New J&L Steel Corp., which subsequently merged with Republic Steel in 1984 to form LTV Steel. LTV Steel was purchased by WL Ross in 2002,

creating the new company International Steel Group (“ISG”). Mittal Steel acquired ISG in 2005, and added Arcelor to become ArcelorMittal in 2006. On or about December 9, 2020, ArcelorMittal USA was acquired by Cleveland-Cliffs Inc. On December 14, 2020, I contacted Cleveland-Cliffs, Inc. regarding the above-captioned judgment, and was informed by its Associate General Counsel, Michael Chimitris, that Cleveland-Cliffs, Inc. does not object to the termination of the judgment.

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

Dated: December 22, 2020  
New York, New York

/s/ T. Jakob Sebrow  
T. Jakob Sebrow  
Trial Attorney  
Antitrust Division  
United States Department of Justice  
26 Federal Plaza, Room 3630  
New York, NY 10278  
Telephone: (202) 644-3381  
Email: tzvi.sebrow@usdoj.gov