

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

UNITED STATES OF AMERICA,  
Plaintiff,

v.

WESTERN NEWSPAPER UNION, *et al.*,  
Defendants.

1:20-mc-793

(Originally Civil Action No. 87-60;  
Civil Action No. 60-Civ.-1803)

**MOTION OF THE UNITED STATES TO  
TERMINATE LEGACY ANTITRUST JUDGMENTS**

Plaintiff, United States of America (“United States”), moves to terminate the judgments in the above-captioned antitrust case pursuant to Rule 60(b) of the Federal Rules of Civil Procedure. As explained in the accompanying United States’ Memorandum of Law in Support of its Motion to Terminate Legacy Antitrust Judgments, the United States has concluded that because of age and changed circumstances since the judgments’ entry, these decades-old judgments no longer serve to protect competition. The United States gave the public notice and the opportunity to comment on its intent to seek termination of the judgments in the above-captioned case; it received no comments opposing termination. For these and other reasons explained in the accompanying memorandum, the United States requests that the judgments be terminated.

Respectfully submitted,

Dated: December 22, 2020

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