

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GRUPO BIMBO, S.A.B. de C.V., et al.

Defendants.

Civil Action No. 11-01857 (EGS)
Judge Emmet G. Sullivan

**MOTION OF THE UNITED STATES
TO APPOINT DIVESTITURE TRUSTEE**

Plaintiff United States hereby moves this Court for entry of an order appointing Mr. James A. Fishkin of Washington, D.C., as Divestiture Trustee pursuant to Section V of the Final Judgment in the above-captioned matter. The United States has informed defendants Grupo Bimbo, S.A.B. de C.V., BBU, Inc., and Sara Lee Corporation (collectively, "Defendants") that it is filing this motion, which, pursuant to the terms of the Final Judgment, Defendants may not oppose. In support of its motion, the United States files herewith a Memorandum of Points and Authorities in Support of Motion of the United States to Appoint Divestiture Trustee and Declaration of Michelle R. Seltzer.

Dated: February 28, 2012

Respectfully submitted,

_____/s/_____
Michelle R. Seltzer (DC Bar #475482)
Attorney

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U.S. Department of Justice

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CERTIFICATE OF SERVICE

I, Michelle Seltzer, hereby certify that on February 28, 2012, I electronically filed the Motion of the United States to Appoint Divestiture Trustee, Memorandum of Points and Authorities in Support of Motion of the United States to Appoint Divestiture Trustee, Declaration of Michelle R. Seltzer, and Proposed Order with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to the following counsel:

For Defendants Grupo Bimbo S.A.B. de C.V. and BBU Inc.:

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