

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

UNITED STATES OF AMERICA,  
Plaintiff,

v.

INTERNATIONAL SALT COMPANY,  
INCORPORATED, *et al.*  
Defendants.

Case No. 1:20-mc-785  
(Originally Civil Action No. 32-310)

**MOTION OF THE UNITED STATES TO  
TERMINATE A LEGACY ANTITRUST JUDGMENT**

Plaintiff, United States of America (“United States”), moves to terminate the judgment 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 a Legacy Antitrust Judgment, the United States has concluded that because of age and changed circumstances since its entry, this decades-old judgment no longer serves to protect competition. The United States gave the public notice and the opportunity to comment on its intent to seek termination of the judgment 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 this judgment be terminated.

Respectfully submitted,

Dated: December 22, 2020

/s/ *Milosz Gudzowski*

Milosz Gudzowski

Trial Attorney

Antitrust Division

United States Department of Justice

26 Federal Plaza, Suite 3630

New York, NY 10278

Telephone: (646) 541-7333

Facsimile: (212) 335-8023

Email: milosz.gudzowski@usdoj.gov