

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

UNITED STATES OF AMERICA,
Plaintiff,

v.

AQUA SYSTEMS, INC., *et al.*,
Defendants.

1:21-mc-12
(Originally Civil Action No. 19-516)

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

Plaintiff, United States of America (“United States”), moves to terminate the two 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 their 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 these judgments be terminated.

Respectfully submitted,

Dated: January 14, 2021

/s/ Kathryn Kushner

Kathryn Kushner

Trial Attorney

Antitrust Division

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