

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

IN RE: URETHANE
ANTITRUST LITIGATION

This document relates to the:

POLYESTER POLYOL CASES

MDL 1616
Civil No. 04-md-01616-JWL
Chief Judge Lungstrum

Oral Argument Requested

**CHEMTURA’S MOTION FOR A FINDING OF “SATISFACTORY COOPERATION”
AND LIMITATION OF DAMAGES PURSUANT TO THE
ANTITRUST CRIMINAL PENALTY ENHANCEMENT AND REFORM ACT OF 2004**

For the reasons set forth in the accompanying memorandum of law in support of this motion (and the exhibits annexed thereto, including the Declaration of Benjamin G. Bradshaw), Defendants Crompton Corporation (now known as Chemtura Corporation) and Uniroyal Chemical Company, Inc. (now merged into Chemtura Corporation) (collectively “Chemtura”), respectfully move this Court for a determination that Chemtura has provided to Plaintiffs the “satisfactory cooperation” acquired under the Antitrust Criminal Penalty Enhancement and Reform Act of 2004 (“ACPERA” or the “Act”) 15 U.S.C.A. § 1, and thus qualifies for the Act’s limitation on recovery with respect to claims based on the alleged polyester polyols conspiracy.

Pursuant to the order of the Court (Doc. # 596), the memorandum and exhibits in support of this motion are being filed under seal.

REQUEST FOR ORAL ARGUMENT

Given the significance of this motion, oral argument is requested.

Dated: June 22, 2007

Respectfully submitted,

s/ W. Joseph Hatley

W. Joseph Hatley (KS #12929)
SPENCER FANE BRITT & BROWNE LLP
1000 Walnut Street, Suite 1400
Kansas City, MO 64106
Tel: 816-292-8392
Fax: 816-474-3216

Ian Simmons
Benjamin G. Bradshaw
Scott M. Hammack
O'MELVENY & MYERS LLP
1625 Eye Street, N.W.
Washington, DC 20006
Tel: (202) 383-5300
Fax: (202) 383-5414

Gerald A. Stein
O'MELVENY & MYERS LLP
Times Square Tower
7 Times Square
New York, NY 10036
Tel: (212) 326-2000
Fax: (212) 326-2060

Counsel for Chemtura Corporation

CERTIFICATE OF SERVICE

Pursuant to the Court's Order Regarding Service (Doc. #35), I hereby certify that on June 22, 2007, I caused this document to be filed electronically with the Clerk of the Court through ECF, and that ECF will send an e-notice of the electronic filing to all counsel who have registered for receipt of documents filed in this matter, including plaintiffs' liaison counsel.

s/ W. Joseph Hatley