

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**IN RE
VITAMIN C ANTITRUST LITIGATION**

This Document Relates To:

*Animal Science Products, Inc., et al. v.
Hebei Welcome Pharmaceutical Co., Ltd., et
al.*, Case No. 1:05-CV-00453(BMC)(JO)
(E.D.N.Y.)

**MASTER FILE 1:06-MDL-1738
(BMC)(JO)**

**DEFENDANTS' NOTICE OF
MOTION AND RENEWED MOTION
FOR JUDGMENT AS A MATTER OF
LAW UNDER FED. R. CIV. P. 50(B)
BASED ON ACT OF STATE AND
FOREIGN SOVEREIGN
COMPULSION AND
INTERNATIONAL COMITY**

TO PLAINTIFFS AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, defendants Hebei Welcome Pharmaceutical Co., Ltd. ("Hebei") and North China Pharmaceutical Group Corp. ("NCPGC") hereby move this Court before the Honorable Brian M. Cogan, United States District Judge, in Courtroom 8D South at the U.S. Courthouse, 225 Cadman Plaza East, Brooklyn, NY 11201 pursuant to Fed. R. Civ. P. 50(b) for judgment as a matter of law dismissing plaintiffs' claims against them and vacating the jury's verdict against them [D.E. 675] and judgment entered against them thereon on March 14, 2013 [D.E. 676] on the grounds that it is barred as a matter of law by the doctrines of act of state, foreign sovereign compulsion and international comity.

Dated: April 11, 2013

Respectfully submitted,

/s/ Charles H. Critchlow
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