

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

_____)	
FEDERAL TRADE COMMISSION)	
)	
Plaintiff,)	
)	
v.)	
)	
TRONOX LIMITED)	
)	
)	
NATIONAL INDUSTRIALIZATION)	CIVIL ACTION
COMPANY)	1:18-cv-01622 (TNM)
)	
NATIONAL TITANIUM DIOXIDE)	
COMPANY LIMITED)	
)	
and)	
)	
CRISTAL USA INC.)	
)	
Defendants.)	
)	
_____)	

DEFENDANTS' NOTICE OF PARTIES' AGREEMENT NOT TO CLOSE

In accordance with the proceedings before the Court of 7/13/18, the parties submit the attached agreement not to close (Ex. A).

Dated: July 16, 2018

Submitted By:

	<i>/s/ Michael F. Williams, P.C.</i> Michael F. Williams, P.C. (D.C. Bar No. 486190) Karen McCartan DeSantis (D.C. Bar No. 420443) KIRKLAND & ELLIS LLP
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	<p>James L. Cooper (D.C. Bar No. 442475) Peter J. Levitas (D.C. Bar No. 441696) Ryan Z. Watts (D.C. Bar No. 478395) Katherine E. Clemons (D.C. Bar No. 1014137) ARNOLD & PORTER KAYE SCHOLER LLP 601 Massachusetts Avenue, NW Washington, D.C. 20001-3743 (202) 942-5000 (202) 942-5999 (facsimile) james.cooper@arnoldporter.com peter.levitas@arnoldporter.com ryan.watts@arnoldporter.com katherine.clemons@arnoldporter.com</p> <p>ATTORNEYS FOR NATIONAL INDUSTRIALIZATION COMPANY (TASNEE), THE NATIONAL TITANIUM DIOXIDE COMPANY LIMITED (CRISTAL), AND CRISTAL USA INC.</p>