UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSIO OFFICE OF ADMINISTRATIVE LAW JUDGES

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SECRETARY

ORIGINAL

In the Matter of

Tronox Limited a corporation,

National Industrialization Company (TASNEE) a corporation,

National Titanium Dioxide Company Limited (Cristal) a corporation,

And

Cristal USA Inc. a corporation.

Docket No. 9377

COMPLAINT COUNSEL'S RESPONSE TO RESPONDENT TRONOX LIMITED'S NOTICE OF DEMONSTRATIVES AND ADDITIONAL EXHIBITS USED AT HEARING

On June 27, 2018, Respondent Tronox Limited filed a notice to the Court with a list of demonstratives and additional exhibits used at the hearing. Complaint Counsel notes that RX2003, RX2005, and RX2006 have already been admitted into evidence during the hearing. All the other RXs and RXDs on Exhibit A of Respondent's notice were used at the hearing but not for the truth of the matter asserted and are not in evidence.

To the extent Respondent Tronox is seeking to add any exhibits into evidence, Complaint Counsel objects to any such requests.

Dated: June 27, 2018 Respectfully Submitted:

/s/ Dominic Vote Dominic Vote Charles Loughlin
Robert Tovsky
Cem Akleman
Peggy Bayer Femenella
Alicia Burns-Wright
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Eric Edmondson Eric Elmore Sean Hughto Janet Kim Joonsuk Lee Meredith Levert **David Morris** Jon Nathan Blake Risenmay Kristian Rogers
Lily Rudy
Cecelia Waldeck

Counsel Supporting the Complaint

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2018, I filed the foregoing document electronically using the FTC's E-Filing System, which will send notification of such filing to:

Donald S. Clark Secretary Federal Trade Commission 600 Pennsylvania Ave., NW, Rm. H-113 Washington, DC 20580 ElectronicFilings@ftc.gov

The Honorable D. Michael Chappell Administrative Law Judge Federal Trade Commission 600 Pennsylvania Ave., NW, Rm. H-110 Washington, DC 20580

I hereby certify that on June 27, 2018, I caused a copy of the foregoing document to be served via email on:

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Counsel for Respondents National Industrialization Company (TASNEE), The National Titanium Dioxide Company Limited (Cristal), and Cristal USA, Inc.

/s/ Charles A. Loughlin Charles A. Loughlin

Counsel Supporting the Complaint

PUBLIC

CERTIFICATE FOR ELECTRONIC FILING

I certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the paper original and that I possess a paper original of the signed document that is available for review by the parties and the adjudicator.

June 27, 2018 By: /s/ Charles A. Loughlin

Charles A. Loughlin