

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

UNITED STATES OF AMERICA,)
)
) Plaintiff,)
) v.)
)
ALCAN, INC.,)
ALCAN ALUMINUM CORP.,)
PECHINEY, S.A., and)
PECHINEY ROLLED PRODUCTS, LLC,)
)
) Defendants.)
_____)

No. 03-CV-02012 (GK)

**DEFENDANTS’ DESCRIPTION AND CERTIFICATION
OF WRITTEN OR ORAL COMMUNICATIONS CONCERNING
THE PROPOSED FINAL JUDGMENT IN THIS ACTION**

Pursuant to Section 2(g) of the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16(g), defendants Alcan, Inc., Alcan Aluminum Corp., Pechiney, S.A., and Pechiney Rolled Products, LLC, (“Defendants”) by their attorneys, submit the following description and certification of all written or oral communications by or on behalf of any of the Defendants with any officer or employee of the United States concerning or relevant to the proposed Final Judgment filed in this action on September 29, 2003. In accordance with Section 2(g), the description excludes any communications “made by counsel of record alone with the Attorney General or the employees of the Department of Justice alone.”

I. Description

From September 2, 2003 to October 1, 2003, Defendants had numerous meetings and telephone conferences with employees of the United States concerning a

possible settlement; from October 1, 2003 to the present date, Defendants have had additional conversations relating to the settlement. All of those contacts related to negotiation of a settlement in the general form contained in the proposed Final Judgment. Listed below are the individuals who participated in one or more of the meetings or telephone conferences.

Defendants

David McAusland, Alcan Inc.
Mac Tracy, Alcan Inc.
Martha Brooks, Alcan Inc.
D. Stuart Meiklejohn, Sullivan & Cromwell LLP
Steven Holley, Sullivan & Cromwell LLP
Michael Miller, Sullivan & Cromwell LLP

United States Department of Justice

Deborah Majoras, Antitrust Division
J. Robert Kramer II, Antitrust Division
Maribeth Petrizzi, Antitrust Division
Anthony Harris, Antitrust Division
Joseph Miller, Antitrust Division
Ronald Drennan, Antitrust Division

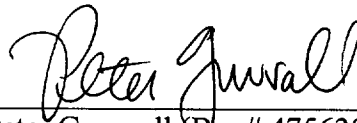
II. Certification

Defendants certify that they have complied with the requirements of Section 2(g) and that the description above of communications by or on behalf of Defendants, known to Defendants, of which Defendants reasonably should have known, or otherwise required to be reported under Section 2(g), is true and complete.

Dated: March 15, 2004

Respectfully submitted,

SULLIVAN & CROMWELL LLP



Peter Gronvall (Bar # 475630)
COUNSEL FOR ALCAN, INC.,
ALCAN ALUMINUM CORP.,
PECHINEY, S.A., and
PECHINEY ROLLED PRODUCTS, LLC.

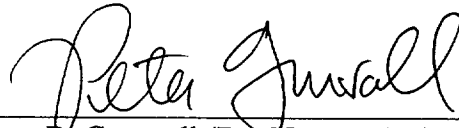
CERTIFICATE OF SERVICE

I hereby certify that on this 15 day of March, 2004, I caused a true copy of the foregoing Defendants' Description and Certification of Written or Oral Communications Concerning the Proposed Final Judgment in this Action to be served via messenger to:

Anthony E. Harris
U.S. DEPARTMENT OF JUSTICE
Antitrust Division, Litigation II Section
1401 H Street, N.W., Suite 3000
Washington, D.C. 20530
(202) 307-6583

Attorney for Plaintiff United States of America

Dated: March 15, 2004



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