## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

| UNITED STATES OF AMERICA,    | ) |  |
|------------------------------|---|--|
| Plaintiff,<br>v.             | ) | Case No. 1:08-cv-00262                                 |
|                              | ) | Assigned to: Hogan, Thomas F. Assign. Date: 02/19/2008 |
| THE THOMSON CORPORATION, and | ) | Description: Antitrust                                 |
| REUTERS GROUP PLC            | ) |  |
| Defendants.                  | ) |  |

### CERTIFICATION OF DEFENDANTS PURSUANT TO 15 U.S.C. § 16(g)

Pursuant to Section 2(g) of the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16(g) (the "Tunney Act"), defendants The Thomson Corporation ("Thomson") and Reuters Group PLC ("Reuters") (together, "Thomson Reuters") make the following disclosure of written and oral communications concerning the proposed Final Judgment. On November 19, 2007, representatives of defendants Thomson and Reuters, along with outside counsel for defendants from Shearman & Sterling LLP and Weil, Gotshal & Manges LLP met with employees of the Department of Justice (the "Department") and discussed, among other topics, a proposed divestiture package to be included in a consent judgment. On December 18, 2007, representatives of defendants Thomson and Reuters, along with outside counsel for defendants from Shearman & Sterling LLP, Weil, Gotshal & Manges LLP, Clifford Chance LLP, and Allen & Overy LLP met with employees of the Department and discussed, among other topics, a proposed divestiture package to be included in a consent judgment. On February 11, 2008 and

February 13, 2007, representatives of defendants Thomson and Reuters, along with outside counsel for defendants from Shearman & Sterling LLP and Weil, Gotshal & Manges LLP met with employees of the Department and discussed, among other topics, a proposed divestiture package to be included in a consent judgment.

The Thomson and Reuters representatives did not submit any written communications to the Department, and the oral communications made by the Thomson and Reuters representatives consisted of responding to questions and comments from the Department. There were no other written or oral communications by or on behalf of defendants Thomson and/or Reuters with any officer or employee of the United States concerning or relevant to the proposed Final Judgment, except for communications by outside counsel for defendants Thomson and/or Reuters alone with employees of the Department, which are exempt from disclosure under 15 U.S.C. § 16(g).

Defendants Thomson and Reuters jointly certify that, pursuant to 15 U.S.C. § 16(g), they have made the required disclosures under this subsection and that this submission is a true and complete description of communications known to defendants or that defendants reasonably should have known that are required to be reported pursuant to that provision.

Dated: May 27, 2008

## Respectfully submitted,

# FOR DEFENDANTS THE THOMSON CORPORATION AND REUTERS GROUP PLC

#### /s/ W. Dale Collins\_\_\_\_

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## **CERTIFICATE OF SERVICE**

I, Jeff L. White, hereby certify that, on May 27, 2008, a true and accurate copy of this Certification of Defendants Pursuant to 15 U.S.C. § 16(g) was filed electronically in the case identified above. A copy of the filing will be sent to the party listed below via United States Postal mailing:

Robert P. Mahnke U.S. Department of Justice Antitrust Division, Networks and Technology Enforcement Section 600 E Street, N.W., Suite 9500 Washington, D.C. 20530

Attorney for Plaintiff United States of America

/s/ Jeff L. White
Jeff L. White