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

In the Matter of
The Kroger Company, a corporation,

and

Albertsons Companies Inc., a corporation

Respondents

Docket No. 9428

**NON-PARTY INTERNATIONAL BROTHERHOOD OF TEAMSTERS
UNOPPOSED MOTION TO EXTEND THE TIME TO MOVE TO QUASH OR LIMIT
SUBPOENA FOR DOCUMENTS**

Non-party Internationa

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Subpoena instruction number 13 requires IBT to “set forth the basis for [IBT’s] objection and respond to all parts of the request to which [IBT’s] do[es] not object. Any ground not stated in an objection within the time provided by 16. C.F.R. § 3.34, or any extension thereof, shall be waived.” Section 3.34(c) provides that any motion “to limit or quash the subpoena shall be filed within the earlier of 10 days after service thereof or the time for compliance therewith.” 16 C.F.R. § 3.34(c).

Counsel for IBT and the FTC met and conferred several times, including preliminarily on April 26, 2024 and April 29, 2024. During the meet-and-confers, Counsel for IBT and the FTC agreed that an additional extension of the deadline to seek relief from the Subpoena would allow the meet and confer process to continue and afford IBT additional time necessary to continue investigating the Subpoena. Counsel for the FTC informed IBT’s counsel that the FTC will not oppose this motion for a fourteen (14) day extension of IBT’s deadline to object or otherwise move to limit or quash the Subpoena.

Granting this extension will allow IBT to preserve its rights to object and/or seek adjudicative relief while IBT evaluates the Subpoena and investigates sources of potentially responsive documents. Without an extension, IBT will need to file an immediate motion to quash or limit the Subpoena to preserve its rights to assert any objections it may have. Conversely, an extension will also allow counsel for IBT and the FTC to further meet and confer, including another meet-and-confer scheduled for tomorrow, regarding the scope of the Subpoena and negotiate the content of IBT’s

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By: /s/ Paulette M. Chesson
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**EXHIBIT A
UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF THE ADMINISTRATIVE LAW JUDGES**

In the Matter of
The Kroger Company, and
Albertsons Companies Inc.

Docket No. 9428

**[PROPOSED] ORDER GRANTING INTERNATIONAL BROTHERHOOD OF
TEAMSTERS UNOPPOSED MOTION TO EXT**
