

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
<i>Plaintiff,</i>	)	
	)	Civil Action No. 1:21CV01067
v.	)	
	)	Judge Timothy Kelly
STONE CANYON INDUSTRIES HOLDINGS,	)	
LLC;	)	
SCIH SALT HOLDINGS INC.;	)	
MORTON SALT, INC.;	)	
and	)	
K+S AKTIENGESELLSCHAFT,	)	
	)	
<i>Defendants.</i>	)	

**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), Defendant Stone Canyon Industries Holdings, LLC, and SCIH Salt Holdings Inc. (“Defendants”), by its undersigned counsel, submit the following description and certification of all written or oral communications by or on behalf of Defendants, with any officer or employee of the United States concerning or relevant to the Proposed Final Judgment filed in this action on April 19, 2021. 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

Senior officers of Stone Canyon Industries Holdings, LLC and SCIH Salt Holdings Inc., working with counsel, had multiple communications concerning the merits of the proposed transaction between the Defendants and the terms of the Proposed Final Judgment filed in this action on April 19, 2021 with various officers and employees of the United States Department of Justice, Antitrust Division. Defendants have had no other communications with officers or employees of the United States concerning or relevant to the Proposed Final Judgment.

## II. CERTIFICATION

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

Respectfully submitted,

/s/ Richard Parker

Richard Parker  
(D.C. Bar #327544)  
Gibson, Dunn & Crutcher LLP  
1050 Connecticut Ave., NW  
Washington, DC 20036  
Telephone: (202) 955-8503  
Email: RParker@gibsondunn.com

Counsel to Defendants Stone Canyon Industries Holdings, LLC, and SCIH Salt Holdings Inc.

Dated: April 29, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been filed through the Court's CM/ECF system, which automatically provides notice to the following:

Kerrie Freeborn, Esq.  
Defense, Industrials, and Aerospace Section  
U.S. Department of Justice  
Antitrust Division  
450 Fifth St. NW, Suite 8700  
Washington, D.C. 20530  
Telephone: (202) 476-9160  
Email: kerrie.freeborn@usdoj.gov

Joseph Matelis  
Sullivan & Cromwell LLP  
125 Broad Street  
New York, NY 10004  
Telephone: (202) 956-7610  
Email: matelisj@sullcrom.com

/s/ Richard Parker  
Richard Parker  
(D.C. Bar #327544)  
Gibson, Dunn & Crutcher LLP  
1050 Connecticut Ave., NW  
Washington, DC 20036  
Telephone: (202) 955-8503  
Email: RParker@gibsondunn.com

Counsel to Defendants Stone Canyon Industries Holdings, LLC, and SCIH Salt Holdings Inc.

Dated: April 29, 2021