PLAINTIFF'S EXHIBIT WRC-954

FEDERAL TRADE COMMISSION
WASHINGTON, D. C. 20580

Bureau of Restraint of Trade

MAR 15 1967

George F. Mason, Jr., Esq.,
Vice President and Associate,
General Counsel,
W. R. Grace & Co.,
7 Hanover Square,
New York, New York. 10005

Re: File No. 671 0622.

Dear Mr. Mason:

We have examined the information and material contained in and enclosed with your letter of January 10, 1967 submitted in response to our November 10, 1966 inquiry in the above-captioned matter. In order that we might properly consider this matter we find the need for, and hereby request, the following additional information:

6. Item 3 of our November 10, 1966 letter requested information concerning acquisitions by Grace of companies engaged in the manufacture, processing and/or sale of perlite and/or vermiculite. On page II-2 of RCA No. 294 entitled "Purchase Land, Building and Equipment of Perlite, Inc. of Hialeah, Florida," submitted as Exhibit 4-1, it is indicated that in January, 1965, Zonolite purchased perlite expanding equipment at Baltimore, Maryland under RCA No. 272. Kindly submit a copy of that RCA along with the information requested in Item 3 of our original inquiry as it relates to this acquistion.

7. It is our understanding that Grace has also acquired Alatex Construction Service, Inc., a processor of perlite located in New Orleans, Louisiana. If Grace has in fact acquired that company, all the information requested in Item 3 should be submitted for that acquisition.

8. Item 3 of our initial inquiry was confined to acquisitions made by Grace. We now wish to expand that request to include the information requested by that Item for acquisitions by Zonolite of companies engaged in the manufacture, processing and/or sale of perlite and/or vermiculite prior to its acquisition by Grace. In this connection it is noted from Exhibit 4-1 that since 1956 Zonolite has operated a perlite plant in Atlanta, Georgia and since 1961 a perlite plant at Wilders, Kentucky.

9. It is also requested that you supply for each of the acquired companies listed in your January 10 letter as well as for any other perlite and vermiculite companies acquired by Grace and Zonolite, the information requested in Item 2(c) and supplied for Grace establishments in Exhibit 2(c)-1 (i.e., the quantity and dollar value of exfoliated vermiculite and expanded perlite sales made from each selling district).

10. It has come to our attention that Grace or Zonolite has acquired certain companies which use or consume expanded perlite and/or exfoliated vermiculite in operation of their businesses. For each such company acquired since January 1, 1951, submit the following:

(a) Name and address;

(b) Date of acquisition;

(c) Nature and value of consideration paid;

(d) Type of operation, including principal products manufactured and/or sold; selling area, total dollar sales during the year preceding acquisition; and total assets and liabilities of the time of acquisition;

(e) The quantity and dollar value of expanded perlite and/or exfoliated vermiculite purchased from each supplier of such products for the periods covering six months prior and six months after its acquisition;

(f) A list of the names and addresses of all executive personnel employed at the time of acquisition. With respect to those acquisitions which were partial indicate the nature of the assets acquired and not acquired or the percentage of the total stock acquired.

11. Submit the name and address of each of Grace's (or Zonolite's) processing distributors in the United States and submit a copy of the license and/or franchise agreement between Grace (or Zonolite) and each such distributor.

Your earliest attention to this matter will be appreciated.

Very truly yours,

William A. Arbitman

William A. Arbitman
Attorney, Division
of Mergers.