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December 30, 2008

**Via E-mail and Express Mail**

Mr. Arthur Badin  
Presidente

CADE - Conselho Administrativo de Defesa Econômica  
SCN - Setor Comercial Norte Quadra 2 - Projeção C  
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**Re: Comments Regarding Resolution N. 49**

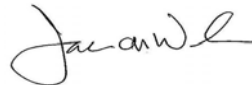
Dear Mr. Badin:

On behalf of the American Bar Association Sections of Antitrust Law and International Law, we appreciate the opportunity to submit the attached comments to the Administrative Council for Economic Defense (*Conselho Administrativo de Defesa Econômica* – “CADE”) with respect to Resolution n. 49, which CADE approved on July 23, 2008 (“Resolution 49/2008”).

Please note that these views are being presented only on behalf of the Sections of Antitrust Law and International Law. They have not been approved by the House of Delegates or the Board of Governors of the American Bar Association and should not be construed as representing the position of the American Bar Association.

If you have any questions after reviewing this report, we would be happy to provide further comments.

Sincerely,



James A. Wilson  
Chair, Section of Antitrust Law



Aaron Schildhaus  
Chair, Section of International Law