Williams & Jensen

A Professional Corporation

LAWYERS

1155 2197 STREET, N.W.

WASHINGTON, D.C. 20036-3308

TELEPHONE

(202) 659-6201

FACSIMILE

(202) 659-5249

SALLY B. PFUND ANTHONY J. RODA DAVID A. STARR MARY LYNNE WHALEN J. D. WILLIAMS BARBARA E. WIXON

OF COUNSEL
ROBERT E. JENSEN
JANET I. JENSON
ROGER E. MIDDLETON
JAMES L. THOMPSON
BARNABY W. ZALL

MOT ADMITTED IN D.C.

November 7, 1995

Michael Marinelli Federal Election Commission 900 E Street, N.W. Washington, D.C.

RE:

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Request for an Advisory Opinion dated October 17, 1995.

On Behalf of Continental Airlines

Dear Mr. Marinelli:

In response to our phone conversation of last week regarding our request for an advisory opinion submitted on behalf of Continental Airlines, listed below are the responses to the questions you posed during our conversation:

- (Q): Does Continental Airlines still retain ownership of any stock of the former Eastern Airlines?
- (A): No. Continental Airlines has fully divested itself of ownership in any and all stock of the former Eastern Airlines.
- (Q): Does Continental Airlines continue to be responsible for the pension program of the former Eastern Airlines?
- (A): No. Continental no longer is responsible for maintaining the pension program for former Eastern Airlines employees.
- (Q): Are there any other situations which evidence affiliation between Continental Airlines and the former Eastern Airlines, such as common directors, officers or administrative personnel?
- (A): No. The only remaining representative of the former Eastern Airlines is the bankruptcy

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Trustee. In fact, there are no members currently serving on the Board of Continental Airlines' who also served as director during the time the two airlines were affiliated.

- (Q): Are the PACs of Continental Airlines and the former Eastern Airlines commonly administered?
- (A): No. Eastern Airlines PAC is administered by the law firm of Verner, Liipfert, which has no relationship with either Continental Airlines or its separated segregated fund.
- (Q): Have there been any infusions of cash by Continental Airlines into Eastern Airlines?
- (A): No. Eastern Airlines no longer exists as a viable entity.

I hope this information is helpful to the Commission as it prepares its advisory opinion. If you require any additional information, or would like to discuss what is contained herein, please do not hesitate to contact me.

Sincerely,

Barbara E. Wixon

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