

Exhibit 11

White & Case LLP
701 Thirteenth Street, NW
Washington, DC 20005

Tel + 1 202 626 3600
Fax + 1 202 639 9355
www.whitecase.com

Direct Dial + (202) 626-3696

January 26, 2006

FOIA/PA Officer, Antitrust Division
Department of Justice
Suite 200, Liberty Place Building
Washington, DC 20530-0001

Re: Freedom of Information Act Request

RECEIVED
2006 JAN 26 AM 11:14
FOIA/PA UNIT
ANTITRUST DIVISION

Dear Sir or Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552 *et seq.* (2000) (“FOIA”) and regulations promulgated thereunder, particularly 28 C.F.R. Part 16 (2004), Stolt-Nielsen Transportation Group Ltd. (“SNTG”) hereby requests that the U.S. Department of Justice (“Department”), Antitrust Division (“Antitrust Division”) release any and all documents that reflect, memorialize, embody or contain communications regarding the investigation into the parcel tanker industry, to or from:

- (1) Any attorney with St. Martin & Williams, including but not limited to Conrad S.P. “Duke” Williams III; and
- (2) Any attorney with Kasowitz, Benson, Torres & Friedman LLP, including but not limited to:
 - (i) Hector Torres;
 - (ii) Harold G. Levinson; or
 - (iii) Gary W. Dunn.

As this request relates to documents and meetings regarding SNTG and does not involve confidential information related to any individuals, there are no privacy issues under 28 C.F.R. § 16.41(d) (2004).

If this request is denied in whole or part, SNTG requests that the Antitrust Division justify all deletions by reference to specific exemptions of FOIA. SNTG also expects the Antitrust

FOIA/PA Officer, Antitrust Division

WHITE & CASE

January 26, 2006

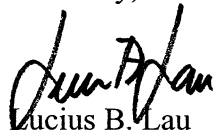
Page 2

Division to release all segregable portions of otherwise exempt material. SNTG, of course, reserves the right to appeal the Antitrust Division's decision to withhold any information.

SNTG expects to receive a reply from the Antitrust Division within twenty (20) business days of the receipt of this request, as mandated by FOIA, 5 U.S.C. § 552(a)(6)(A)(i) (2000). SNTG is prepared to appeal any adverse decision regarding release of the requested materials.

Please do not hesitate to contact the undersigned at (202) 626-3696 if you have any questions regarding this request.

Sincerely,



Lucius B. Lau