Supreme Court Holds That Price Squeeze Claims Are Not Cognizable Absent a Duty to Deal at the Wholesale Level

Date: 03/02/09

On February 25, 2009, the Supreme Court issued a unanimous decision in *Pacific Bell Tel. Co. d/b/a AT&T California v. linkLine Commc'ns, Inc.* Resolving a split among the lower courts, the Court held that a price-squeeze claim may not be brought under Section 2 of the Sherman Act unless the defendant has an antitrust duty to deal with the plaintiff at wholesale. The Court also clarified that the pleading standards announced in *Twombly*, which arose in the conspiracy Section 1 context, apply to Section 2 monopolization claims.