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UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES



In the Matter of

Tronox Limited
a corporation,

National Industrialization Company
(TASNEE)
a corporation,

Docket No. 9377

The National Titanium Dioxide
Company Limited (Cristal)
a corporation,

And

Cristal USA Inc.
a corporation.

**RESPONDENTS NATIONAL INDUSTRIALIZATION COMPANY, THE NATIONAL
TITANIUM DIOXIDE COMPANY LIMITED, AND CRISTAL USA INC.'S
MOTION FOR *IN CAMERA* TREATMENT OF PROPOSED TRIAL EXHIBITS**

National Industrialization Company (TASNEE), the National Titanium Dioxide Company Limited, and Cristal USA Inc. (collectively, "Cristal") respectfully request that this Court grant *in camera* treatment pursuant to 16 C.F.R. § 3.45(b) to the proposed trial exhibits described in the accompanying Declaration of Mark Stoll.

I. INTRODUCTION

Complaint Counsel and Respondents have prepared proposed trial exhibit lists containing over 2500 documents. Many Cristal documents designated in these exhibit lists contain sensitive confidential information of Cristal, public disclosure of which would cause serious, clearly defined injury to Cristal's business interests. Cristal requests *in camera* treatment for 492 of the over 2500 designated documents, as described in the accompanying Declaration of Mark Stoll

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and Attachment A to that declaration (the “Document List” and collectively “Cristal’s Confidential Documents”).¹

II. ARGUMENT

In camera treatment of documents offered into evidence is appropriate if “public disclosure will likely result in a clearly defined, serious injury to the . . . corporation requesting *in camera* treatment or after finding that the material constitutes sensitive personal information.” 16 C.F.R. § 3.45(b). The person or entity requesting *in camera* treatment can meet this standard by demonstrating that the documents are “sufficiently secret and sufficiently material to [Respondents’] business that disclosure would result in serious competitive injury.” *See In re Evanston Nw. Healthcare Corp.*, 2005 F.T.C. LEXIS 27, at *1 (Feb. 9,2005) (citing *In re Bristol-Meyers Co.*, 90 F.T.C. 455, 456 (1977); *In re Gen. Foods Corp.*, 95 F.T.C. 352, 355 (1980)). For documents more than three years old, the applicant “must also demonstrate, by affidavit or declaration, that such material remains sensitive.” *In re 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55, at *3 (Apr. 4, 2017).

In *Bristol-Meyers* the Commission outlined six factors the Court may consider in assessing documents sought to be kept *in camera*:

- (1) the extent to which the information is known outside the applicant’s business;
- (2) the extent to which the information is known by employees and others involved in the applicant’s business;
- (3) the extent of measures taken by the applicant to guard the secrecy of the information;
- (4) the value of the information to the applicant and its competitors;
- (5) the resources expended by the applicant in developing the information; and

¹ Cristal requests confidential treatment of the Stoll Declaration and Document List pursuant to the December 7, 2017 Protective Order Governing Confidential Material and has attached as Exhibit 4 a copy of each page of this Motion and associated attachments containing material designated confidential. Pursuant to Rule 16 C.F.R. 3.45(e), the Protective Order is attached hereto as Exhibit 5. Due to their size, Cristal has provided the documents listed on the Document List via File Transfer Protocol and DVD.

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(6) the ease or difficulty with which the information could be properly acquired or duplicated by others.

Bristol-Meyers, 90 F.T.C. at 456-57.

Rule 3.45(b) also requires the applicant to specify the duration of *in camera* treatment requested for each document. “In determining the length of time for which *in camera* treatment is appropriate, . . . ordinary business records are granted less protection than trade secrets.” *I-800 Contacts*, 2017 FTC LEXIS 55, at *5. Trade secrets include, *inter alia*, “secret formulas, processes, other secret technical information, or information that is privileged.” *Id.* “[O]rdinary business records include information such as customer names, pricing to customers, business costs and profits, as well as business plans, marketing plans, or sales documents.” *Id.* at *5-6. Business records meeting the standard for *in camera* treatment are typically kept *in camera* for two to five years. *Id.*

A. Cristal’s Confidential Documents Are Sufficiently Secret and Sensitive to Warrant *in Camera* Treatment

Cristal’s Confidential Documents contain information going to the core of Cristal’s competitive activity, and *in camera* treatment is necessary to protect Cristal’s confidential business strategies and analyses from public disclosure and use by Cristal’s customers, suppliers, and competitors to Cristal’s detriment. These documents contain information that could be used against Cristal in business negotiations, that would harm Cristal’s reputation or otherwise damage customer relationships, that would give competitors an unfair advantage over Cristal, or that would facilitate competitors’ attempts to replicate or frustrate Cristal’s strategic initiatives. This information is kept highly confidential within Cristal. Stoll Decl. ¶¶ 11-13.

1. Confidential Financial Forecasts and Information, Customer-Specific Pricing, Product-Level Pricing, and Cost Information

The first through fourth categories of Cristal Confidential Documents contain Cristal’s confidential financial forecasts and information, customer-specific pricing information (details of

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prices, discounts, and price changes for specifically identified Cristal customers), product-level pricing information (details of prices or price changes charged or planned for TiO₂ products), and cost information. The Commission has long recognized the substantial injury that can result from the disclosure of confidential financial information. *See, e.g., In re SKF Indus.*, No. 9046C, 1977 F.T.C. LEXIS 86, at *3 (Oct. 4, 1977) (granting *in camera* treatment to exhibits containing detailed financial information). These documents contain the company's confidential, non-public financial information and forecasts, and pricing and cost information, disclosure of which would reveal details about the workings of Cristal's business, financial positions, and competitive strengths and weaknesses. Stoll Decl. ¶¶ 14-16, 22-24, 35-36, 40-41. This information could be used by customers, suppliers, and competitors to gain an advantage over Cristal in negotiations and in the marketplace. *Id.* ¶¶ 16, 25-28, 37-38, 42-45. Cristal requests that documents in these categories be kept *in camera* for five years, including documents in these categories that are more than three years old, which remain competitively sensitive. *Id.* ¶¶ 17-21, 39, 46.²

Only one document falling exclusively into the customer-specific pricing category is older than three years old: PX2011. *Id.* ¶ 29. Cristal's confidential pricing and the price negotiation methodology that could be gleaned from this document amounts to a trade secret underlying Cristal's entire sales structure, and public disclosure would cause catastrophic damage to Cristal's business. *Id.* ¶¶ 29-34. Cristal respectfully requests indefinite *in camera* treatment for PX2011, or in the alternative, at least 10 years of *in camera* treatment. The Commission has previously granted extended *in camera* treatment to similar documents. *See, e.g., In re E. I. DuPont de Nemours & Co.*, 1990 FTC LEXIS 134, at *5-6 (Apr. 25, 1990) (granting an extended period of

² Many documents contain more than one category of confidential information, as described in the Document List. For each such document, Cristal is requesting the longest period of *in camera* treatment applicable to the document to protect the information justifying the longer duration from disclosure. For documents more than three years old, justification for the requested protection is specifically described in the discussion of the category of information giving rise to the justification.

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in camera treatment of ten years for a document containing a “highly unusual level of detailed cost data”).

2. Pricing Strategy, Customer Negotiations, and Internal Customer Strategy

The documents noticed for potential use at trial include internal company presentations and communications that reflect Cristal’s confidential pricing strategy and customer negotiations, including internal strategy for customer negotiations. Stoll Decl. ¶¶ 56-57, 62-64. Public disclosure of these confidential customer and internal communications would harm Cristal by (i) damaging established customer relationships, (ii) giving customers a strategic advantage in negotiations, and (iii) providing competitors with a roadmap of Cristal’s pricing and sales process and an unfair insight into how Cristal competes for the business of specific customers. *Id.* ¶¶ 58-60, 63-68. In addition, many of the documents in this category remain competitively sensitive for more than three years and require extended *in camera* protection. Documents disclosing Cristal’s approach to competitive strategy and negotiations with customers, particularly similarly situated customers, are not stale. Three years is less time than most of Cristal’s customer relationships, and those relationships would be damaged if customer negotiation details from the past five years are revealed. *Id.* ¶¶ 61, 69-71. As such, Cristal requests that pricing strategy documents and customer negotiations and related internal strategy documents older than three years be granted *in camera* treatment for five years and that more recent documents in these categories be granted *in camera* treatment for ten years.

3. Production and Product Allocation Decisions

The production decision and product allocation documents category consists of Cristal’s proprietary analyses of market dynamics, margins, input costs, customer trends and demands, and other sensitive strategic information going to the core of Cristal’s business, *e.g.*, which types of products to produce, how much of each product to produce, at which manufacturing locations to produce said products, and which customers and distributors to prioritize as it negotiates and

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delivers said products. *Id.* ¶¶ 72-74. Public release of these documents would significantly lessen Cristal's abilities to compete in the marketplace. Competitors would be able to ascertain both Cristal's overall business plan and strategies and detailed proprietary information about its products, plants, and customer negotiations and relationships. *Id.* ¶¶ 75-76, 80. Cristal would also be significantly disadvantaged during customer negotiations, and Cristal's relationships with at least some customers might be damaged. *Id.* ¶¶ 77-79. The core information and strategic considerations in these documents will remain highly competitively relevant for the foreseeable future. *Id.* ¶ 83. As such, Cristal requests *in camera* treatment for five years for documents in this category older than three years, and for ten years for more recent documents.

4. Business Plans and Competitive Strategy

The business plans and competitive strategy documents consist of Cristal's proprietary analyses of market dynamics, margins, input costs, customer trends, and other sensitive strategic information. Stoll Decl. ¶¶ 48-51. These documents reveal highly confidential information concerning Cristal's strategies in the TiO₂ marketplace, strategic decision making of executives, and strategic analyses of the TiO₂ and TiO₂ feedstock industries, including recommendations on Cristal's future competitive posture. *Id.* The core information contained in these documents regarding Cristal's pricing, marketing, and production planning tactics, strategy regarding competitive pricing and customer negotiations, strategic supply planning, and broader competitive strategic initiatives have remained generally consistent over the past several years, and will remain highly competitively relevant for the foreseeable future. Public disclosure of that closely held information would limit Cristal's ability to execute those strategies and adjust them to changing competitive dynamics, would provide competitors the ability to exploit weaknesses and appropriate strengths in Cristal's plans, and could harm Cristal's customer relationships and

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position in customer negotiations. *Id.* ¶¶ 52-55. Cristal therefore requests that all of the documents in this category receive *in camera* treatment for five years.

5. Technical and Trade Secret Information

Cristal's technical information documents consist of information regarding the technical specifications and capabilities of Cristal's manufacturing plants and products. With regard to Cristal's manufacturing plants, this information includes detailed descriptions of proprietary systems and processes, plans to improve upon said systems and processes, manufacturing capacity and capabilities for specific plants, and cost information. Stoll Decl. ¶¶ 86-87. With regard to Cristal's products, this information includes testing and benchmarking results, internal analysis of product quality and specifications, product development and improvement plans, and technical support capabilities. *Id.* ¶ 88.

Release of such documents would significantly lessen Cristal's ability to compete in the marketplace. Cristal would lose competitive advantages it has developed and is working to develop regarding its manufacturing processes and systems as well as product development and improvement. Competitors will be able to unfairly appropriate Cristal's innovations and proprietary information. Competitors would be able to ascertain any weaknesses within Cristal's manufacturing systems and processes as well as in Cristal's products and unfairly exploit that confidential information to significantly lessen Cristal's competitiveness in the marketplace. *Id.* ¶¶ 89-91. As such, Cristal requests *in camera* treatment for documents in this category for ten years. *Id.* ¶ 92.

6. Pricing Formulas/Models

Cristal's secret pricing formulas and models are trade secrets underlying Cristal's entire sales structure, and public disclosure of this information would cause harm to Cristal's business, including its ability to effectively negotiate with customers, its relationships with customers, and

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its ability to compete effectively against rivals. Stoll Decl. ¶¶ 93-98. These documents will remain sensitive for the foreseeable future. *Id.* ¶ 98-99.

Indefinite *in camera* treatment is appropriate where “the need for confidentiality of the material . . . is not likely to decrease over time,” 16 C.F.R. § 3.45(b)(3), and “the circumstances which presently give rise to this injury are likely to be forever present so as to warrant the issuance of an indefinite *in camera* order rather than one of more limited duration.” *DuPont*, 1990 FTC LEXIS 134, at *2-3. Because Cristal does not intend at this time to abandon these models and formulas in the foreseeable future, Cristal requests indefinite *in camera* treatment for these documents, or, in the alternative, *in camera* treatment for at least 10 years.

7. Sensitive Personal Compensation and Benefits Information

Five documents contain sensitive information about compensation and benefits for specific individuals, and Cristal’s plans relating to future potential changes in its work force and compensation/benefits strategy for specific Cristal facilities (*see* PX2322). Stoll Decl. ¶ 100. Three documents, PX2349, PX2438, and PX2184, fall exclusively into this category. Compensation is sensitive personal information not known to other employees and its disclosure would harm those individuals. This compensation information is also important confidential business information going to Cristal’s ability to recruit and retain talented employees. *Id.* ¶ 101. Disclosure of this information would give competitors a recruitment advantage and prospective and current employees an advantage over Cristal in compensation negotiations. *Id.* ¶¶ 102-103. As such, Cristal requests *in camera* treatment for these documents for five years.

8. Documents Produced in Other Litigations Subject to Protective Orders Should Remain Confidential

Certain documents on the exhibit lists were originally produced in federal civil litigations pursuant to or subject to protective orders entered in those courts. Ex. 2, Protective Order, *Valspar Corp. v. Millennium Inorganic Chem., Inc.*, No. 13-cv-03214 (D. Minn. July 7, 2014);

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Ex. 3, Stipulated Protective Order, *In re Titanium Dioxide Antitrust Litig.*, No. 1:10-cv-00318 (D. Md. Sept. 21, 2011). Some documents were produced by or jointly with non-parties to this case. In addition to the reasons set forth above, Cristal respectfully requests *in camera* treatment of these litigation documents in accordance with the protective orders in those litigations. Stoll Decl. ¶ 104.

* * *

Each of these documents is a confidential business record, contains trade secret information that Cristal has not disclosed publicly and has worked to keep secret, and/or was produced subject to a protective order in a prior civil litigation. These documents reveal secret and competitively sensitive information about Cristal's business strategy, customer negotiations and contracts, and present and future operations. If these documents were placed onto the public record, Cristal's competitive position would be significantly harmed in a multitude of ways. Accordingly, Cristal respectfully requests that the Court grant its request for *in camera* treatment. Should the Court find that Cristal has not met its burden to demonstrate necessity of *in camera* treatment of any of the requested documents, Cristal respectfully requests the opportunity to proffer additional supporting information.

Dated: May 1, 2018

Respectfully submitted,

/s/ Katherine E. Clemons

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ATTORNEYS FOR TRONOX LIMITED

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st of May, 2018, I filed the foregoing document electronically with:

Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue, N.W.,
Rm. H-113
Washington, DC 20580
secretary@ftc.gov

I also hereby certify that I caused a true and correct copy of the foregoing Motion for In Camera Treatment to be served upon the following via electronic mail.

/s/ Katherine E. Clemons
Katherine E. Clemons

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UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

Tronox Limited
a corporation,

National Industrialization Company
(TASNEE)
a corporation,

Docket No. 9377

The National Titanium Dioxide
Company Limited (Cristal)
a corporation,

And

Cristal USA Inc.
a corporation.

[PROPOSED] ORDER

Upon consideration of National Industrialization Company, the National Titanium Dioxide Company Limited, and Cristal USA Inc.'s Motion For In Camera Treatment of Proposed Trial Exhibits, it is HEREBY ORDERED that the proposed trial exhibits listed in Attachment A are to be provided *in camera* treatment for the time period indicated therein.

ORDERED:

D. Michael Chappell
Chief Administrative Law Judge

Date:

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EXHIBIT 1

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**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES**

In the Matter of

**Tronox Limited
a corporation,**

**National Industrialization Company
(TASNEE)
a corporation,**

Docket No. 9377

**The National Titanium Dioxide Company
Limited (Cristal)
a corporation,**

And

**Cristal USA Inc.
a corporation.**

DECLARATION OF MARK STOLL

I, Mark Stoll, based upon my personal knowledge concerning matters to which I am competent to testify, hereby declare as follows:

1. I am the General Manger of Mergers and Acquisitions of Cristal USA Inc.
2. I also work closely with Cristal USA Inc.'s corporate parents, National Industrialization Company ("TASNEE") and The National Titanium Dioxide Company Limited, and my role as General Manager of Mergers and Acquisitions is part of the TASNEE corporate structure.
3. Cristal USA Inc., TASNEE, and The National Titanium Dioxide Company Limited are Respondents in the above-captioned matter.
4. I am authorized to testify on behalf of all three of these Respondent entities (collectively, "Cristal") for purposes of this declaration regarding the contents, confidentiality, and materiality of Cristal documents proposed to be introduced at trial.

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5. I am familiar with the types of documents for which Cristal is seeking *in camera* treatment as well as the types of information contained in those documents. I am also familiar with the confidentiality protection afforded this type of information by Cristal and the importance of this information and the confidentiality thereof to Cristal's business interests.

6. Counsel for Cristal has conducted a thorough review of the documents for which Cristal is seeking *in camera* treatment and has provided me with detailed descriptions of the documents containing confidential Cristal information.

7. As explained further below, public disclosure of the documents and information described in Attachment A to this Declaration ("Document List") and in Cristal's Motion for *In Camera* Treatment of Proposed Trial Exhibits would cause Cristal serious competitive injury.

8. The Document List attached to this Declaration contains a detailed description of the confidential material in each document for which Cristal is seeking *in camera* treatment. The list also identifies each document as falling into one or more of the following categories of confidential information that is material to Cristal's business and that would harm Cristal if disclosed:

- (1) Confidential Financial Information and Forecasts
- (2) Customer-Specific Pricing Information
- (3) Product-Level Pricing Information
- (4) Cost Information
- (5) Business Plans and Competitive Strategy
- (6) Pricing Strategy
- (7) Customer Negotiations and Internal Customer Strategy
- (8) Production and Product Allocation Decisions
- (9) Proprietary Technical Information
- (10) Pricing Formulas/Models
- (11) Sensitive Compensation and Benefits Information
- (12) Federal Court Litigation Protective Order Documents

9. For each of these categories, I have included a description below of the specific type and nature of information included in the documents falling into the category, as well as the serious injury that public disclosure of the information would inflict on Cristal. For each category for which Cristal is seeking *in camera* treatment for documents older than 3 years, I have included an explanation of how

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those documents remain competitively sensitive today. Finally, for each category of documents, I have included a description of why the duration of *in camera* treatment that Cristal is seeking is necessary to prevent future harm to Cristal's business interests.

10. Although many of these documents are ordinary business records, they contain information that Cristal has not distributed to the public, its customers, its competitors, its suppliers, or even all Cristal employees.

11. Cristal expends significant effort to maintain the confidentiality of this information except with respect to individual counterparties in negotiations and entities that have signed non-disclosure agreements. Even in these situations, the information Cristal shares is provided only on a need-to-know basis. The information in documents falling into these categories, as identified in the Document List, is not available to the public through other means.

12. Cristal has established procedures and policies to restrict this type of competitively sensitive information to management-level employees, Cristal employees who need access to the information in order to perform their job responsibilities, and the specific customers or suppliers with whom the sales, prices, or costs are being negotiated. For instance, as a matter of corporate practice, customer and product level pricing is essentially limited to the commercial management team and analysts, with limited information available to some finance and integrated business planning managers. This information is not available to individual sales or customer service representatives who are not global account managers, except to the extent necessary to manage their accounts. Cristal also applies passwords on many pricing and margin files in case they accidentally get forwarded to the wrong person and as an extra layer of protection. Distribution of standard cost and margin (based on standard cost) information, which is even more limited, is to only sales, marketing, and integrated business planning management and global marketing analysts.

13. When Cristal produced confidential material to the FTC, it relied on the confidentiality rules and protective order that shielded confidential information from public disclosure.

I. Pricing, Sales, and Cost Information

14. A number of the documents listed for potential use at the public hearing, including many of Cristal's Responses to the FTC's requests for documents and information, and depositions of Cristal employees, contain sensitive information involving Cristal's sales and pricing data, confidential customer information, cost information, and other confidential financial data related to Cristal's TiO₂ business and other business units. Public disclosure of such information threatens to compromise Cristal's competitive

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position by putting Cristal on uneven footing with customers, suppliers, and competitors in its business dealings.

A. *Category 1: Confidential Financial Information and Forecasts*

15. The documents in this category contain the company's confidential financial information and forecasts, disclosure of which would reveal details about the workings of Cristal's business, its financial positions, and its competitive strengths and weaknesses, all of which could be used by customers, suppliers, and competitors to gain an advantage over Cristal in negotiations and in the marketplace.

16. Current and potential suppliers or customers could also use this confidential information in negotiations with Cristal. Knowledge of how profitable Cristal's facilities and products are, for example, would give customers leverage in negotiations, and would give competitors insight into where to devote resources to gain an unfair advantage over Cristal. Competitors could also use this information in customer negotiations to undermine Cristal's position with shared customers.

17. The documents in this category that are more than three years old remain competitively sensitive today and will continue to be sensitive. The financial projections in these documents are still relevant today, either because they project out to the present and future or because they reflect aspects of Cristal's business strategy that have not changed, even if some of the underlying input numbers (e.g., costs, product pricing) may have changed since the time a particular forecast was created.

18. A competitor or customer in possession of this information could make adjustments to known variables, using publicly available data and information known by all industry participants, to update the forecasts and would be able to closely approximate more current forecasts prepared by Cristal.

19. Further, the overall analysis and strategic goals indicated by such forecasts remain the same today, and a customer or competitor gaining access to such information would have insights into Cristal's current competitive strategy that would cause injury to Cristal's current business position.

20. The other older documents in this category contain enough information and are in such a format that they could be used to extrapolate data that would reveal the details of Cristal's current financial positions or to back out underlying formulas that form the basis for Cristal's current financial business strategy.

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21. As such, while the documents themselves may be more than three years old, the information contained in those documents remains competitively sensitive, and disclosure of that information will harm Cristal as much and in the same way as disclosure of more recent documents.

B. Category 2: Customer-Specific Pricing Information

22. Cristal's pricing for TiO₂ products is customer-specific and not generally known outside the particular customer relationship. Cristal negotiates prices for each product on a customer-by-customer basis at arm's length based on a multitude of factors regarding [REDACTED]
[REDACTED]
[REDACTED]

23. Documents in this category contain the specific pricing and, in some cases, contract terms negotiated with particular customers, including [REDACTED]
[REDACTED]

24. The type of information contained in this category of documents is treated as highly confidential and proprietary within Cristal. The information is disseminated on a need-to-know basis within Cristal. This granular information is not disclosed outside of the company and its owners other than under an NDA for specific limited circumstances and, in particular, is not disclosed to Cristal's competitors.

25. Cristal would be significantly disadvantaged during negotiations with customers if this information became public. Through the documents in this category, customers would be able to access Cristal's pricing to other customers for products they purchase from Cristal, in essence crippling Cristal in what are typically arm's length negotiations with customers regarding price and volume.

26. Competitors could exploit this information in negotiations with Cristal's customers, and could use it to identify and target areas where such information would permit the competitor to gain a competitive advantage over Cristal and focus resources on those areas.

27. Similarly, competitors could use such information to inform their own production decisions in ways that would be harmful to Cristal.

28. Cristal safeguards its customer information in order to avoid this type of competitive injury, and public disclosure of these secret data would render meaningless Cristal's efforts to limit distribution of this sensitive information.

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29. Only one document falling exclusively into this category is older than three years old:

PX2011. [REDACTED]
[REDACTED]
[REDACTED]

30. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

31. [REDACTED]

[REDACTED]
[REDACTED]

32. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

33. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

34. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

C. Category 3: Product-Level Pricing Information

35. Documents in this category contain details of prices or price changes charged or planned by Cristal for TiO2 products generally or for specific grades of TiO2 or other Cristal products.

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36. The type of information contained in this category of documents is treated as highly confidential and proprietary within Cristal. The information is disseminated on a need-to-know basis within Cristal. This granular information is not disclosed outside of the company and its owners other than under an NDA for specific limited circumstances and, in particular, is not disclosed to Cristal's competitors.

37. If this information were to become public, Cristal would be significantly disadvantaged during negotiations with customers. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

38. Competitors could also use this information to undermine Cristal's competitiveness by utilizing Cristal's proprietary information to exploit its perceived weaknesses or adopt its successful strategies.

39. Because of the long-term customer relationships Cristal has built and the length of the TiO₂ business cycle, Cristal would continue to be harmed by release of this information over the next five years.

D. Category 4: Cost Information

40. Documents in this category include specific information about Cristal's costs, such as overhead and input cost information for Cristal's business and production facilities.

41. The type of information contained in this category of documents is treated as highly confidential and proprietary within Cristal. The information is disseminated on a need-to-know basis within Cristal. This granular information is not disclosed outside of the company and its owners other than under an NDA for specific limited circumstances and, in particular, is not disclosed to Cristal's competitors.

42. Customers receiving this information could use Cristal's costs to gain an advantage in negotiations, to Cristal's detriment.

43. Competitors could exploit this information in negotiations with Cristal's customers and could use it to identify and target areas where such information would permit the competitor to gain a competitive advantage over Cristal and focus resources on those areas.

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44. Similarly, competitors could use such information to inform their own production decisions in ways that would be harmful to Cristal.

45. Cristal safeguards its cost data in order to avoid this type of competitive injury, and public disclosure of these secret data would render meaningless Cristal's efforts to limit distribution of this sensitive information.

46. Disclosure of the cost information in these documents would be harmful to Cristal for at least 5 years, because [REDACTED]

II. Strategic and Future Plans

47. Certain of the documents listed for potential use at the public hearing contain internal Cristal strategic plans and confidential analyses of Cristal's business operations. Public disclosure of such information threatens to compromise Cristal's competitive position by revealing confidential information to competitors and companies with whom Cristal has business dealings.

A. *Category 5: Business Plans and Competitive Strategy*

48. Documents in category 5 concern Cristal's internal company presentations and communications that reflect Cristal's confidential business plans and strategies. Some of these documents discuss confidential Cristal business opportunities, strategic goals, competitive initiatives going forward, operating plans, competitive strategy, and strengths and weaknesses with respect to pricing and margins, including discussions of Cristal's industry outlook and future goals and initiatives.

49. These documents reveal highly confidential information concerning (i) Cristal's customer and distributor contracts, negotiations, and communications, (ii) Cristal's strategies in the TiO₂ marketplace, (iii) the strategic decision making of Cristal and TASNEE executives, and (iv) Cristal's strategic analyses of the TiO₂ and TiO₂ feedstock industries, including Cristal's current competitive positioning in the marketplace and recommendations on Cristal's future competitive posture.

50. Cristal does not broadly disseminate these types of strategy documents, even within Cristal. Rather, these strategies are restricted to a limited group of management and executive personnel charged with devising and implementing Cristal's strategic direction and competitive goals.

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51. Disclosure of these documents would reveal detailed confidential information about Cristal's business operations, sales performance, customer base, production facilities, and customer service capabilities.

52. Release of such information to competitors would limit Cristal's ability to execute its business plans and allow its competitors to undermine Cristal's broader strategy as well as diminish Cristal's ability to market its products, effectively utilize its plants, and maintain its customer relationships.

53. Competitors could use this information to gain insight into the workings and directional strategy of Cristal's business, allowing them to undermine the competitiveness of Cristal's business by exploiting areas of weakness and tailoring their own strategies to hurt Cristal's business. Cristal would not have access to similar information of its competitors and would therefore be at a strategic disadvantage.

54. Competitors could also use Cristal's strategies, [REDACTED], in their own business planning. Competitors would get the benefit of Cristal's strongest competitive and operational initiatives without having to invest the resources that Cristal has spent to develop these initiatives, harming Cristal's ability to effectively compete against those competitors from a cost and value perspective.

55. Current and potential suppliers or customers also could use confidential information in negotiations with Cristal to gain an unfair advantage or otherwise undermine Cristal's negotiating power.

B. Category 6: Pricing Strategy

56. Documents in this category contain information reflecting Cristal's strategy with respect to pricing for its products. These documents reveal highly sensitive, non-public information going to the core of Cristal's sales structure.

57. Cristal does not broadly disseminate these types of strategy documents, even within Cristal. Rather, these strategies are restricted to a limited group of management and executive personnel charged with devising and implementing Cristal's strategic direction and competitive goals.

58. Public disclosure of this internal pricing strategy would harm Cristal's ability to effectively negotiate with customers, who would have deep insight into Cristal's confidential strategy during negotiations that are typically conducted at arm's length.

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59. Public disclosure would also harm Cristal’s ability to compete effectively against rivals, who would seek to exploit their new-found knowledge of Cristal’s pricing strategy and appropriate its methodology without having to expend the resources Cristal has put into developing it.

60. Competitors could also use this information to gain a strategic advantage in their own negotiations with customers.

61. [REDACTED]

C. Category 7: Customer Negotiations and Internal Customer Strategy

62. Documents in this category contain information reflecting contract and sales negotiations with specific customers and Cristal’s internal strategy with respect to those negotiations.

63. Customer relationship management is a critical part of Cristal’s business. Public disclosure of these confidential customer and internal communications would harm Cristal by damaging established customer relationships, giving customers a strategic advantage in negotiations.

64. As discussed in paragraph 12, Cristal limits distribution of this information even within Cristal to employees who need the information in order to perform their job responsibilities.

65. Disclosure would also provide competitors with a roadmap of Cristal’s pricing and sales process and an unfair insight into how Cristal competes for the business of specific customers.

66. If customers and competitors had the insight into Cristal’s negotiating strategy that can be gleaned from these documents, Cristal’s position in future negotiations would be irreparably damaged. Competitors whose internal strategies had not been publicly disclosed would be able to exploit those insights in negotiations with Cristal customers and in formulating their own approach to customer negotiations.

67. [REDACTED]

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68. [REDACTED]

69. [REDACTED]

70. The damage caused by public disclosure of these documents would also be caused by release of information that is more than three years old, as three years is a relatively short period of time given the length of many of Cristal's customer relationships and the length of the TiO2 business cycle.

71. [REDACTED]

D. Category 8: Production and Product Allocation Decisions

72. Documents in this category contain information about decisions and strategies relating to Cristal's various production facilities that produce TiO2 and other products, as well as Cristal's mining and smelting (slagging) operations, including decisions about where and to which customers to allocate products manufactured at those facilities.

73. These documents reveal highly confidential information concerning (i) Cristal's customer and distributor contracts, negotiations, and communications, (ii) Cristal's strategies in the TiO2 marketplace, (iii) the strategic decision making of Cristal executives, and (iv) Cristal's strategic analyses of the TiO2 and TiO2 feedstock industries, including Cristal's current competitive positioning in the marketplace and recommendations on Cristal's future competitive posture.

74. Cristal does not broadly disseminate these types of documents, even within Cristal. Rather, these strategies are restricted to a limited group of personnel charged with devising and implementing Cristal's production and product allocation strategies.

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75. Release of such documents would significantly lessen Cristal’s abilities to compete in the marketplace in the following ways:

76. Competitors would be able to ascertain both Cristal’s overall business plan and strategies and detailed proprietary information about its products, plants, and customer negotiations and relationships. Making this sensitive information available to the public would limit Cristal’s ability to execute its business plans and allow its competitors to unfairly exploit any weaknesses in Cristal’s broader strategy as well as its products, plants, and customer relationships.

77. [REDACTED]

78. [REDACTED]

79. [REDACTED]

80. Some of these documents contain detailed sales, operations, and cost information for Cristal’s various facilities and products in various regions. Each of these categories of information could be used by competitors to gain insight into Cristal’s business to undermine the competitiveness of each of Cristal’s facilities.

81. In addition, this information could be used by Cristal’s suppliers to gain an advantage in negotiations for Cristal’s purchases of inputs into its manufacturing processes.

82. The types of information described above are treated as highly confidential and proprietary within Cristal and by its owners. The information is disseminated on a need-to-know basis.

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This information is not disclosed to others outside of the company and, in particular, is not disclosed to Cristal's competitors or suppliers.

83. While some of the details referenced in particular documents may change with time, the core information and strategic considerations contained in these documents regarding Cristal's production planning tactics, customer demands and preferences, approach to customer negotiations, strategic supply planning, and strategy with respect to the TiO₂ industry as a whole have remained generally consistent over the past several years and will remain highly competitively relevant for the foreseeable future.

III. Technical Information and Other Trade Secrets

A. *Category 9: Proprietary Technical Information*

84. The documents in the proprietary technical information category consist of information regarding the technical specifications, capabilities, and proprietary processes relating to Cristal's manufacturing plants and products.

85. Cristal does not broadly disseminate these types of documents or technical information, even within Cristal.

86. With regard to Cristal's manufacturing plants, this information includes detailed descriptions of proprietary systems and processes, plans to improve upon said systems and processes, manufacturing capacity and capabilities for specific plants, and cost information. Most of the documents in this category provide detailed information relating to Cristal's manufacturing facility in Yanbu and Cristal's ilmenite slagging facility in Jazan, Saudi Arabia ("Jazan Slagger").

87. [REDACTED]

88. With regard to Cristal's products, this information includes testing and benchmarking results, internal analysis of product quality and specifications, product development and improvement plans, and technical support capabilities provided to customers.

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89. Release of such documents would significantly lessen Cristal's abilities to compete in the marketplace. Cristal would lose competitive advantages it has developed and is working to develop with regard to its manufacturing processes and systems as well as product development and improvement.

90. Competitors will be able to unfairly appropriate Cristal's innovations and proprietary information. Competitors would be able to ascertain any weaknesses within Cristal's manufacturing systems and processes as well as in Cristal's products and unfairly exploit that confidential information to significantly lessen Cristal's competitiveness in the marketplace.

91. Cristal devotes significant resources to developing and refining its technical expertise and keeping the details of that expertise confidential. These details are trade secrets, and public disclosure of these trade secrets would diminish their value.

92. The details of the facilities and processes discussed in these documents do not change significantly over time, so it is important that Cristal be able to maintain the confidentiality of this information for the foreseeable future, for at least the next 10-15 years, including for documents that are more than three years old.

B. Category 10: Pricing Formulas/Models

93. Documents in this category include pricing models and formulas that Cristal uses to inform its pricing decisions.

94. Cristal does not broadly disseminate this type of information, even within Cristal. Rather, these strategies are restricted to a limited group of personnel charged with devising and implementing Cristal's pricing strategy and consultants Cristal has retained to help develop such strategies.

95. [REDACTED]

96. By its very nature, a pricing formula or pricing model remains competitively sensitive so long as it is still in use. The documents in this category reveal pricing formulas and models that Cristal still uses to inform its pricing decisions. As described above in paragraphs 25-34, 37-38, and 58-60,

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information about Cristal's pricing could be used by competitors and customers in ways that would harm Cristal's business.

97. [REDACTED]

98. In order to maintain the secrecy of its pricing strategy, if these documents were disclosed to the public, Cristal would have to abandon or significantly alter the methodology it has developed through substantial investment of time and resources.

99. [REDACTED]

IV. Category 11: Sensitive Compensation and Benefits Information

100. Five documents on Complaint Counsel's proposed exhibit list contain sensitive information about the compensation and benefits packages offered to specific individuals, and Cristal's plans relating to future potential changes in its work force and compensation/benefits strategy for specific Cristal facilities (see PX2322).

101. Three of the five documents, PX2349, PX2438, and PX2184, fall exclusively into this category of confidential information. Compensation is sensitive personal information not known to other employees, and its disclosure would be harmful to those individuals. This compensation information is also important confidential business information of Cristal. Cristal competes for a limited pool of talented employees with experience suited to the TiO₂ industry primarily through compensation and benefits packages.

102. Other TiO₂ suppliers compete with Cristal to recruit qualified individuals, and those competitors could use knowledge of the compensation and benefits packages offered by Cristal in their recruitment and hiring negotiations to harm Cristal's ability to retain key personnel.

103. Disclosure of the compensation packages of certain employees and offerees, particularly for high-level and technical positions for which there is not necessarily a "market" rate, would also harm Cristal by giving prospective and current employees an advantage over Cristal in compensation negotiations.

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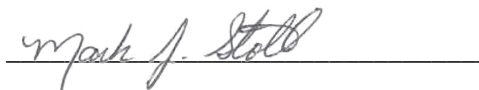
V. Category 12: Documents Produced Pursuant to Protective Orders in Federal Court Proceedings

104. I understand that certain documents on the exhibit lists were originally produced pursuant to or subject to protective orders in civil litigations in federal courts. Those documents are identified as Litigation Protective Order in the Document List.

VI. Conclusion

105. For each category, the examples provided are merely representative—they are not meant to be an exhaustive list of all potential harms from public disclosure. This declaration draws upon the collective efforts of multiple people other than myself, and is based on my understanding of the facts at this time. I reserve the right to modify or supplement this affidavit if I discover new facts that render it inaccurate or incomplete.

Pursuant to 28 U.S.C. § 1746, I declare, under penalty of perjury, that the foregoing is true and correct.



Mark Stoll

May 1, 2018

Date

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ATTACHMENT A

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX0001; RX0719	3/2/2017		PX0001-001	PX0001-059	Customer-Specific Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX0002	9/6/2017		PX0002-001	PX0002-114	Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX0005; RX0730	8/15/2017		PX0005-001	PX0005-035	Pricing Strategy; Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX0012	9/25/2017		PX0012-001	PX0012-008	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX0013; RX0737	9/1/2017		PX0013-001	PX0013-006	Customer-Specific Pricing Information		5 years
PX0015	9/1/2017		PX0015-001	PX0015-003	Proprietary Technical Information		10 years
PX0016; RX0202; RX0637	10/17/2017		PX0016-001	PX0016-140	Customer-Specific Pricing Information; Pricing Strategy; Confidential Financial Information and Forecasts; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX0019	4/13/2017		PX0019-001	PX0019-115	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX0020; RX1173	2/5/2018		PX0020-001	PX0020-037	Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX0024	3/2/2018		PX0024-001	PX0024-028	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2000	12/15/2015		CR2R-000658314	CR2R-000658360	Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX2002	8/25/2016		CR2R-002371809	CR2R-002371810	Pricing Formulas/Models		Indefinite (or, in the alternative, at least 10 years)
PX2004	10/23/2012		CR2R-003204712	CR2R-003204712	Business Plans and Competitive Strategy		5 years
PX2006	10/26/2016		CR2R-000122118	CR2R-000122118	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2007	10/27/2016		CR2R-000122142	CR2R-000122144	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2008	4/28/2017		CR2R-000234433	CR2R-000234440	Pricing Formulas/Models; Customer Negotiations and Internal Customer Strategy		Indefinite (or, in the alternative, at least 10 years)

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2009	5/1/2017		CR2R-000234485	CR2R-000234487	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2011	4/5/2013		CR2R-000262988	CR2R-000262993	Customer-Specific Pricing Information		Indefinite (or, in the alternative, at least 10 years)
PX2014; RX0756	11/21/2016		CR2R-001578220	CR2R-001578448	Business Plans and Competitive Strategy; Cost Information		5 years
PX2016	4/3/2013		CR2R-001657616	CR2R-001657618	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2020	8/25/2016		CR2R-002371813	CR2R-002371814	Business Plans and Competitive Strategy		5 years
PX2021	5/25/2011		CR2R-000328563	CR2R-000328565	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2025	00/00/2017		CR2R-000781209	CR2R-000781209	Product-Level Pricing Information		5 years
PX2026	10/6/2017		CR2R-000794237	CR2R-000794237	Customer-Specific Pricing Information; Business Plans and Competitive Strategy		5 years
PX2027	9/14/2016		CR2R-001000051	CR2R-001000053	Product-Level Pricing Information; Business Plans and Competitive Strategy; Cost Information		5 years
PX2029	7/14/2013		CR2R-001763653	CR2R-001763659	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2031	11/18/2015	[REDACTED]	CR2R-001969524	CR2R-001969593	Pricing Formulas/Models; Business Plans and Competitive Strategy	[REDACTED]	Indefinite (or, in the alternative, at least 10 years)
PX2036	11/4/2011	[REDACTED]	CR2R-001813614	CR2R-001813616	Customer-Specific Pricing Information; Pricing Strategy	[REDACTED]	years
PX2038	8/29/2015	[REDACTED]	CR2R-006551755	CR2R-006551762	Production and Product Allocation Decisions; Business Plans and Competitive Strategy	[REDACTED]	0 years
PX2039	9/9/2016	[REDACTED]	CR2R-000050431	CR2R-000050435	Production and Product Allocation Decisions; Business Plans and Competitive Strategy	[REDACTED]	0 years
PX2041	8/19/2016	[REDACTED]	CR2R-000197278	CR2R-000197279	Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy	[REDACTED]	0 years
PX2042	9/23/2016	[REDACTED]	CR2R-000781208	CR2R-000781227	Product-Level Pricing Information; Production and Product Allocation Decisions; Business Plans and Competitive Strategy	[REDACTED]	0 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2046	6/10/2015		CR2R-004510283	CR2R-004510283	Product-Level Pricing Information; Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2047	4/21/2015		CR2R-004563770	CR2R-004563779	Pricing Strategy; Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2049	2/27/2016		CR2R-006265285	CR2R-006265291	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
PX2050	5/13/2015		CR2R-006872262	CR2R-006872268	Product-Level Pricing Information; Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2054	2/7/2013		CR2R-001377453	CR2R-001377453	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2055	2/26/2016		CR2R-002922147	CR2R-002922147	Business Plans and Competitive Strategy		5 years
PX2059	11/14/2016		CRI_SR0000001371	CRI_SR0000001384	Business Plans and Competitive Strategy		5 years
PX2060	8/15/2016		CRI_SR0000001396	CRI_SR0000001409	Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2061	3/16/2017		CRI_SR0000001343	CRI_SR0000001359	Business Plans and Competitive Strategy		5 years
PX2062	5/12/2017		CRI_SR0000001313	CRI_SR0000001328	Business Plans and Competitive Strategy		5 years
PX2065	9/9/2013		CR2R-000296975	CR2R-000296976	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2068	7/17/2015		CR2R-000532792	CR2R-000532793	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2069	8/30/2016		CR2R-002533239	CR2R-002533242	Customer-Specific Pricing Information		5 years
PX2070	2/28/2012		CR2R-000317646	CR2R-000317650	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2077	11/24/2015		CR2R-001420053	CR2R-001420057	Pricing Strategy		5 years
PX2088	6/17/2014		CR2R-000288754	CR2R-000288764	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2089	9/1/2016		CR2R-000774681	CR2R-000774682	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2090	1/16/2017	[REDACTED]	CR2R-000970591	CR2R-000970593	Pricing Strategy	[REDACTED]	5 years
PX2091	3/30/2017	[REDACTED]	CR2R-001008001	CR2R-001008002	Product-Level Pricing Information; Pricing Strategy	[REDACTED]	5 years
PX2092	4/1/2017	[REDACTED]	CR2R-001018601	CR2R-001018602	Customer-Specific Pricing Information	[REDACTED]	5 years
PX2094	4/28/2017	[REDACTED]	CR2R-001018999	CR2R-001019002	Pricing Strategy	[REDACTED]	5 years
PX2098	1/3/2017	[REDACTED]	CR2R-001181633	CR2R-001181634	Pricing Strategy	[REDACTED]	5 years
PX2100	5/9/2017	[REDACTED]	CR2R-001189188	CR2R-001189188	Pricing Strategy	[REDACTED]	5 years
PX2102	5/4/2017	[REDACTED]	CR2R-001189225	CR2R-001189230	Pricing Formulas/Models; Customer-Specific Pricing Information	[REDACTED]	Indefinite (or, in the alternative, at least 10 years)
PX2105	1/4/2017	[REDACTED]	CR2R-001373501	CR2R-001373502	Customer-Specific Pricing Information	[REDACTED]	5 years
PX2106	1/17/2017	[REDACTED]	CR2R-001544428	CR2R-001544429	Pricing Strategy; Business Plans and Competitive Strategy	[REDACTED]	5 years
PX2108	4/21/2016	[REDACTED]	CR2R-002278775	CR2R-002278776	Pricing Strategy	[REDACTED]	5 years
PX2109	1/3/2017	[REDACTED]	CR2R-002911103	CR2R-002911107	Customer-Specific Pricing Information	[REDACTED]	5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2110; RX0689	3/29/2017		CR2R-003151848	CR2R-003151850	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2112	6/8/2016		CR2R-003481215	CR2R-003481216	Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions		10 years
PX2113	1/20/2017		CR2R-005822092	CR2R-005822093	Pricing Strategy		5 years
PX2116; RX0734	8/23/2016		CR2R-005255428	CR2R-005255623	Customer-Specific Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2122	3/5/2017		CR2R-000561137	CR2R-000561141	Production and Product Allocation Decisions		10 years
PX2123	11/22/2016		CR2R-005247497	CR2R-005247517	Business Plans and Competitive Strategy		5 years
PX2124	3/20/2017		CR2R-000563218	CR2R-000563248	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2125	5/28/2017		CR2R-000563611	CR2R-000563616	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2128	5/13/2017		CR2R-005147640	CR2R-005147647	Confidential Financial Information and Forecasts		5 years
PX2129	3/14/2017		CR2R-005148588	CR2R-005148647	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2130	2/21/2017		CR2R-005149194	CR2R-005149222	Confidential Financial Information and Forecasts		5 years
PX2132	11/15/2016		CR2R-005163647	CR2R-005163647	Production and Product Allocation Decisions; Cost Information		10 years
PX2133	12/4/2015		CR2R-005205268	CR2R-005205314	Product-Level Pricing Information; Production and Product Allocation Decisions; Cost Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2134	9/29/2016	[REDACTED]	CR2R-005211310	CR2R-005211368	Pricing Formulas/Models; Product-Level Pricing Information; Pricing Strategy; Confidential Financial Information and Forecasts	[REDACTED]	Indefinite (or, in the alternative, at least 10 years)
PX2135	9/5/2016	[REDACTED]	CR2R-005253585	CR2R-005253632	Business Plans and Competitive Strategy	[REDACTED]	5 years
PX2138	6/3/2016	[REDACTED]	CR2R-007411307	CR2R-007411310	Business Plans and Competitive Strategy	[REDACTED]	5 years
PX2140; RX0733	12/3/2015	[REDACTED]	CR2R-008614857	CR2R-008614863	Business Plans and Competitive Strategy	[REDACTED]	5 years
PX2142	3/20/2017	[REDACTED]	CR2R-000563200	CR2R-000563217	Proprietary Technical Information; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX2143	12/6/2016	[REDACTED]	CR2R-007175926	CR2R-007175926	Product-Level Pricing Information; Production and Product Allocation Decisions; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX2144	4/17/2016	[REDACTED]	CR2R-007183144	CR2R-007183285	Customer-Specific Pricing Information; Product-Level Pricing Information; Production and Product Allocation Decisions; Cost Information	[REDACTED]	10 years
PX2147	1/12/2017	[REDACTED]	CR2R-010331606	CR2R-010331612	Business Plans and Competitive Strategy	[REDACTED]	5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2149; RX0729	8/9/2016		CR2R-000592957	CR2R-000592960	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2151	5/30/2017		CR2R-005175900	CR2R-005175910	Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2152	1/9/2016		CR2R-000192126	CR2R-000192128	Pricing Formulas/Models; Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		Indefinite (or, in the alternative, at least 10 years)
PX2153	2/4/2016		CR2R-000192572	CR2R-000192574	Pricing Formulas/Models; Customer-Specific Pricing Information; Product-Level Pricing Information		Indefinite (or, in the alternative, at least 10 years)
PX2154	1/19/2016		CR2R-000207603	CR2R-000207603	Pricing Formulas/Models; Customer-Specific Pricing Information; Product-Level Pricing Information		Indefinite (or, in the alternative, at least 10 years)
PX2155	1/14/2017		CR2R-008211226	CR2R-008211227	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2156	5/2/2015		CR2R-000594089	CR2R-000594092	Business Plans and Competitive Strategy		5 years
PX2157	6/22/2015		CR2R-001577890	CR2R-001577892	Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2158	12/4/2015		CR2R-001735513	CR2R-001735517	Cost Information; Business Plans and Competitive Strategy		5 years
PX2162	7/15/2016		CR2R-003737613	CR2R-003737614	Business Plans and Competitive Strategy		5 years
PX2163	3/30/2016		CR2R-011855153	CR2R-011855158	Confidential Financial Information and Forecasts		
PX2164; RX0741	12/16/2016		CR2R-003738762	CR2R-003738819	Proprietary Technical Information		10 years
PX2165	5/26/2017		CR2R-002850635	CR2R-002850637	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information		10 years
PX2167	5/9/2016		CR2R-001671028	CR2R-001671029	Business Plans and Competitive Strategy		5 years
PX2171; RX0732	3/9/2017		CR2R-005171303	CR2R-005171308	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2172	8/1/2016		CR2R-000115074	CR2R-000115078	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2173	5/24/2017		CR2R-002432708	CR2R-002432708	Cost Information; Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2174	9/14/2017		CR2R-002461395	CR2R-002461398	Production and Product Allocation Decisions; Cost Information		10 years
PX2175	3/30/2017		CR2R-002836565	CR2R-002836576	Cost Information; Proprietary Technical Information		10 years
PX2177	12/22/2016		CR2R-006539196	CR2R-006539247	Production and Product Allocation Decisions; Cost Information		10 years
PX2178	9/19/2016		CR2R-006532779	CR2R-006532922	Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2179	04/00/2017		CRI_SR0000001434	CRI_SR0000001441	Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX2180	2/8/2017		CR2R-000569711	CR2R-000569739	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2181	6/9/2017		CR2R-000573780	CR2R-000573781	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2183	9/2/2016		CR2R-000595459	CR2R-000595464	Proprietary Technical Information		10 years
PX2184	5/24/2017		CR2R-000596605	CR2R-000596608	Sensitive Compensation and Benefits Information		5 years
PX2187	6/21/2017		CR2R-008126684	CR2R-008126688	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2189	7/26/2017		CR2R-008620788	CR2R-008620789	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2190	6/7/2017		CR2R-011461067	CR2R-011461074	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2193	6/29/2017		CR2R-008392125	CR2R-008392128	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2196;RX0740	9/20/2016		CR2R-002744491	CR2R-002744491	Business Plans and Competitive Strategy		5 years
PX2197	3/31/2017		CR2R-000007813	CR2R-000007822	Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2198	1/12/2017		CR2R-004888849	CR2R-004888867	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2200	9/17/2016		CR2R-004178105	CR2R-004178105	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2201	8/9/2016		CR2R-000668105	CR2R-000668108	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2202;RX0738	8/1/2016		CR2R-000560884	CR2R-000560885	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2204	10/5/2016		CR2R-004505035	CR2R-004505035	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2205; RX0744	2/7/2017		CR2R-007325557	CR2R-007325559	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2206; RX0742	1/11/2017		CR2R-004336503	CR2R-004336527	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2207	4/17/2017		CR2R-005147658	CR2R-005147717	Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX2208; RX0610	12/00/2016		CR2R-005986934	CR2R-005987017	Cost Information; Proprietary Technical Information		10 years
PX2209	12/3/2015		CR2R-004694271	CR2R-004694273	Business Plans and Competitive Strategy		5 years
PX2210	9/29/2015		CR2R-005414290	CR2R-005414374	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2211	5/10/2017		CR2R-002414676	CR2R-002414677	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2217	12/00/2016		CRI_SR0000001585	CRI_SR0000001590	Production and Product Allocation Decisions; Cost Information		10 years
PX2218	12/22/2014		CR2R-001073808	CR2R-001073810	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2219	9/15/2016		CR2R-000774485	CR2R-000774489	Cost Information; Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2220	9/7/2016		CR2R-000197723	CR2R-000197745	Customer-Specific Pricing Information; Product-Level Pricing Information		5 years
PX2221	9/11/2015		CR2R-000538940	CR2R-000538941	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2227	9/18/2015		CR2R-001031518	CR2R-001031521	Business Plans and Competitive Strategy		5 years
PX2228	7/13/2012		CR2R-001682188	CR2R-001682190	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
PX2234	9/19/2016		CR2R-006532750	CR2R-006532778	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2236	2/4/2017		CR2R-001958750	CR2R-001958754	Proprietary Technical Information		10 years
PX2239	12/7/2016		CR2R-000201290	CR2R-000201343	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2245	7/13/2012		CR2R-004040998	CR2R-004041137	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2246	8/19/2015		CR2R7G-000005474	CR2R7G-000005680	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX2247	2/18/2015		CR2R7G-000022383	CR2R7G-000022661	Product-Level Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX2248	8/3/2012		CR2R7G-000030929	CR2R7G-000030990	Litigation Protective Order		In Accordance with Protective Order
PX2249	10/18/2012		CR2R7G-000045905	CR2R7G-000045970	Litigation Protective Order		In Accordance with Protective Order
PX2250	7/17/2012		CR2R7G-000067725	CR2R7G-000067780	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX2251	7/24/2012		CR2R7G-000074522	CR2R7G-000074576	Customer-Specific Pricing Information; Pricing Strategy; Litigation Protective Order		5 years
PX2252	5/22/2012		CR2R7G-000087834	CR2R7G-000087887	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX2253	5/24/2012		CR2R7G-000089817	CR2R7G-000089889	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX2254	6/15/2012		CR2R7G-000095711	CR2R7G-000095811	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX2257; RX1020	8/19/2015		CR2R7G-000006075	CR2R7G-000006219	Customer-Specific Pricing Information; Litigation Protective Order		5 years
PX2258	3/13/2013		CR2R-001928983	CR2R-001928986	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2259	6/9/2016		CR2R-000110711	CR2R-000110713	Cost Information; Proprietary Technical Information		10 years
PX2262	1/30/2014		CR2R-000292951	CR2R-000292956	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2270	9/2/2014		CR2R-002663153	CR2R-002663155	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2271	5/18/2016		CR2R-003728694	CR2R-003728705	Business Plans and Competitive Strategy		5 years
PX2274	5/15/2015		CR2R-008089004	CR2R-008089005	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2275	9/29/2016		CR2R-000966866	CR2R-000966867	Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy		10 years
PX2281	9/20/2016		CR2R-000609042	CR2R-000609056	Confidential Financial Information and Forecasts; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2282	5/10/2017		CR2R-003834196	CR2R-003834275	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2283	7/28/2017		CR2R-010735598	CR2R-010735600	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2284; RX0696	12/30/2016		CR2R-004335945	CR2R-004335951	Proprietary Technical Information		10 years
PX2286	8/1/2016		CR2R-000115069	CR2R-000115073	Production and Product Allocation Decisions; Cost Information		10 years
PX2287	12/1/2015		CR2R-000797028	CR2R-000797029	Business Plans and Competitive Strategy		5 years
PX2288	4/16/2017		CR2R-002890961	CR2R-002891084	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2289	12/12/2016		CR2R-008787497	CR2R-008787734	Confidential Financial Information and Forecasts; Cost Information; Business Plans and Competitive Strategy		5 years
PX2291	5/7/2017		CR2R-003811238	CR2R-003811251	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2292	4/3/2017		CR2R-000576227	CR2R-000576234	Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2293	2/16/2017		CR2R-004366850	CR2R-004366850	Business Plans and Competitive Strategy		5 years
PX2294	6/6/2017		CR2R-004375903	CR2R-004375904	Product-Level Pricing Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2295; RX0743	2/5/2017		CR2R-004367689	CR2R-004367690	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2299	8/1/2016		CR2R-000774978	CR2R-000774981	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2300	4/1/2017		CR2R-001018603	CR2R-001018604	Customer-Specific Pricing Information		5 years
PX2301	1/13/2017		CR2R-001064585	CR2R-001064586	Customer-Specific Pricing Information		5 years
PX2303	12/9/2016		CR2R-001181439	CR2R-001181440	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2304	8/1/2016		CR2R-001309290	CR2R-001309291	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2305	7/29/2016		CR2R-001309320	CR2R-001309321	Customer-Specific Pricing Information		5 years
PX2307	8/1/2016		CR2R-005804675	CR2R-005804676	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2310	7/28/2017		CRP3-000501244	CRP3-000501247	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2311	7/27/2017		CRP3-000501252	CRP3-000501257	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2312	10/18/2017		CRP3-000519313	CRP3-000519314	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2313	10/18/2017		CRP3-000519385	CRP3-000519386	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2314	10/25/2017		CRP3-000520804	CRP3-000520808	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2315; RX0735	5/18/2017		CR2R-011267074	CR2R-011267078	Pricing Formulas/Models; Customer-Specific Pricing Information		Indefinite (or, in the alternative, at least 10 years)
PX2316; RX0736	10/31/2017		CRP3-000521998	CRP3-000522000	Customer-Specific Pricing Information; Product-Level Pricing Information		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2318	8/29/2016		CR2R-002904707	CR2R-002904710	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2322	8/31/2017		CRP3-000244969	CRP3-000244978	Cost Information; Business Plans and Competitive Strategy; Sensitive Compensation and Benefits Information		5 years
PX2328	9/28/2017		CRP3-000534558	CRP3-000534583	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
PX2329	10/4/2017		CRP3-000544158	CRP3-000544160	Cost Information		5 years
PX2330	9/13/2017		CRP3-000182063	CRP3-000182064	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2331	11/16/2017		CRP3-000188061	CRP3-000188062	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2338	08/00/2017		CRP3-000039133	CRP3-000039144	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2340	3/6/2017		CR2R-006003947	CR2R-006003950	Business Plans and Competitive Strategy		5 years
PX2343	5/26/2016		CR2R-003742634	CR2R-003742640	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
PX2345	10/24/2017		CRP3-000535641	CRP3-000535652	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2346	11/2/2017		CRP3-000535428	CRP3-000535429	Business Plans and Competitive Strategy		5 years
PX2347	8/22/2017		CRP3-000535221	CRP3-000535224	Confidential Financial Information and Forecasts; Cost Information; Business Plans and Competitive Strategy		5 years
PX2356	10/1/2017		CRP3-000191352	CRP3-000191368	Pricing Formulas/Models		Indefinite (or, in the alternative, at least 10 years)
PX2357	11/22/2017		CRP3-000520908	CRP3-000520920	Pricing Strategy; Confidential Financial Information and Forecasts		5 years
PX2358	1/5/2018		CRP3-000186762	CRP3-000186766	Pricing Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2360	9/29/2017		CRP3-000191372	CRP3-000191385	Pricing Formulas/Models		Indefinite (or, in the alternative, at least 10 years)
PX2363	8/29/2017		CRP3-000183001	CRP3-000183002	Pricing Formulas/Models		Indefinite (or, in the alternative, at least 10 years)
PX2364	9/28/2017		CRP3-000520159	CRP3-000520161	Customer-Specific Pricing Information; Product-Level Pricing Information		5 years
PX2365	1/13/2017		CRP3-000269670	CRP3-000269671	Customer-Specific Pricing Information		5 years
PX2366	9/1/2017		CRP3-000508363	CRP3-000508365	Product-Level Pricing Information		5 years
PX2367	12/11/2017		CRP3-000515700	CRP3-000515702	Pricing Formulas/Models		Indefinite (or, in the alternative, at least 10 years)
PX2368	6/2/2017		CRP3-000771163	CRP3-000771167	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2369	12/16/2015		CR2R-000533570	CR2R-000533597	Pricing Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2370	5/2/2017		CRP3-000531968	CRP3-000180011	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information		10 years
PX2371	12/6/2017		CRP3-000186409	CRP3-000186429	Cost Information; Proprietary Technical Information		10 years
PX2372	10/22/2017		CRP3-000189773	CRP3-000189778	Proprietary Technical Information		10 years
PX2373; RX0731	10/3/2017		CRP3-000191135	CRP3-000191207	Pricing Strategy; Business Plans and Competitive Strategy; Confidential Financial Information and Forecasts; Cost Information		5 years
PX2376	8/19/2017		CRP3-000227621	CRP3-000227626	Proprietary Technical Information		10 years
PX2377	10/12/2017		CRP3-000228672	CRP3-000228697	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2378; RX0866	10/13/2017		CRP3-000229060	CRP3-000229081	Cost Information; Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2380	11/6/2017	[REDACTED]	CRP3-000230909	CRP3-000230912	Proprietary Technical Information	[REDACTED]	10 years
PX2381	9/29/2017	[REDACTED]	CRP3-000241505	CRP3-000241508	Proprietary Technical Information	[REDACTED]	10 years
PX2382	10/12/2017	[REDACTED]	CRP3-000241724	CRP3-000241792	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information	[REDACTED]	10 years
PX2383	7/12/2017	[REDACTED]	CRP3-000505856	CRP3-000505899	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy	[REDACTED]	5 years
PX2385	1/6/2018	[REDACTED]	CRP3-000551450	CRP3-000551453	Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX2386	10/25/2017	[REDACTED]	CRP3-000551956	CRP3-000551958	Business Plans and Competitive Strategy	[REDACTED]	5 years
PX2387	12/20/2017	[REDACTED]	CRP3-000564853	CRP3-000564867	Production and Product Allocation Decisions	[REDACTED]	10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2390	12/28/2017		CRP3-000774830	CRP3-000774839	Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX2392	9/22/2017		CRP3-000626026	CRP3-000626036	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2393	9/25/2017		CRP3-000626598	CRP3-000626708	Confidential Financial Information and Forecasts; Cost Information; Proprietary Technical Information		10 years
PX2394	10/28/2017		CRP3-000629859	CRP3-000629871	Production and Product Allocation Decisions; Cost Information		10 years
PX2396	11/16/2017		CRP3-000633425	CRP3-000633428	Production and Product Allocation Decisions; Cost Information		10 years
PX2398	2016		CR2R-011839650	CR2R-011839890	Business Plans and Competitive Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2399	9/29/2017		CRP3-000233943	CRP3-000233947	Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2400	9/29/2017	[REDACTED]	CRP3-000233935	CRP3-000233938	Proprietary Technical Information	[REDACTED]	
PX2401	9/30/2017		CRP3-000234087	CRP3-000234124	Proprietary Technical Information		10 years
PX2402	10/3/2017		CRP3-000233965	CRP3-000233966	Proprietary Technical Information		10 years
PX2404	9/29/2017		CRP3-000233948	CRP3-000233952	Proprietary Technical Information		10 years
PX2406	10/6/2017		CRP3-000233391	CRP3-000233393	Cost Information; Proprietary Technical Information		10 years
PX2407	10/6/2017		CRP3-000233365	CRP3-000233375	Proprietary Technical Information		10 years
PX2408	10/17/2017		CRP3-000234948	CRP3-000234949	Production and Product Allocation Decisions		10 years
PX2410	10/26/2017		CRP3-000232579	CRP3-000232580	Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2411	11/1/2017		CRP3-000234619	CRP3-000234673	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2412	11/3/2017		CRP3-000230992	CRP3-000231001	Proprietary Technical Information		10 years
PX2413	11/6/2017		CRP3-000235112	CRP3-000235115	Proprietary Technical Information		10 years
PX2415	8/19/2017		CRP3-000238929	CRP3-000238935	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2416	9/18/2017		CRP3-000241916	CRP3-000241922	Proprietary Technical Information		10 years
PX2418	10/26/2017		CRP3-000234521	CRP3-000234527	Proprietary Technical Information		10 years
PX2420	8/19/2017		CRP3-000245057	CRP3-000245058	Production and Product Allocation Decisions		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2423	8/31/2017		CRP3-000244734	CRP3-000244735	Proprietary Technical Information		10 years
PX2425	9/29/2017		CRP3-000241505	CRP3-000241508	Proprietary Technical Information		10 years
PX2426	11/6/2017		CRP3-000230909	CRP3-000230912	Proprietary Technical Information		10 years
PX2427	11/6/2017		CRP3-000230926	CRP3-000230931	Proprietary Technical Information		10 years
PX2428	11/1/2017		CRP3-000552059	CRP3-000552063	Production and Product Allocation Decisions; Cost Information		10 years
PX2431	10/12/2017		CRP3-000237563	CRP3-000237631	Cost Information; Proprietary Technical Information		10 years
PX2433	11/18/2015		CR2R-001568001	CR2R-001568001	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions		10 years
PX2435	11/3/2015		CR2R-004014415	CR2R-004014415	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2438	5/7/2017		CR2R-006004150	CR2R-006004153	Sensitive Compensation and Benefits Information		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2439	12/19/2017		CRP3-000360084	CRP3-000360086	Sensitive Compensation and Benefits Information		5 years
PX2440	11/16/2017		CRP3-000360157	CRP3-000360168	Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2441	10/11/2017		CRP3-000360196	CRP3-000360210	Business Plans and Competitive Strategy		5 years
PX2446	8/12/2017		CRP3-000360797	CRP3-000360798	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2447	8/22/2017		CRP3-000360839	CRP3-000360840	Business Plans and Competitive Strategy		5 years
PX2452	2/1/2016		CR2R-008462689	CR2R-008462691	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2453; RX0782	1/19/2016		CR2R-000820531	CR2R-000820536	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2454	1/29/2016		CR2R-000814803	CR2R-000814804	Pricing Strategy; Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2455	1/29/2016		CR2R-000787749	CR2R-000787751	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2456	11/18/2015		CR2R-000525575	CR2R-000525576	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy		10 years
PX2457	10/30/2015		CRP3-000274970	CRP3-000274972	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2458	12/1/2017		CRP3-000520509	CRP3-000520513	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2459	11/3/2017		CRP3-000520608	CRP3-000520613	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2460	9/29/2017		CRP3-000520745	CRP3-000520749	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2461	8/5/2016		CRP3-000359243	CRP3-000359245	Product-Level Pricing Information; Production and Product Allocation Decisions		10 years
PX2462	3/31/2016		CR2R-000179382	CR2R-000179384	Pricing Formulas/Models; Customer-Specific Pricing Information; Product-Level Pricing Information		Indefinite (or, in the alternative, at least 10 years)

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2466	12/11/2017		CRP3-000202120	CRP3-000202127	Production and Product Allocation Decisions; Cost Information		10 years
PX2467	11/21/2017		CRP3-000194683	CRP3-000194690	Cost Information		5 years
PX2470	11/9/2017		CRP3-000193691	CRP3-000193703	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2471	11/7/2017		CRP3-000220838	CRP3-000220845	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2472	7/28/2017		CRP3-000532657	CRP3-000532664	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2474	11/6/2017		CRP3-000193836	CRP3-000193844	Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2475	6/2/2017		CRP3-000500599	CRP3-000500602	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2476	12/18/2017		CRP3-000232929	CRP3-000232965	Cost Information; Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2478	10/24/2017		CRP3-000553491	CRP3-000553492	Proprietary Technical Information		10 years
PX2479	10/25/2017		CRP3-000552828	CRP3-000552830	Production and Product Allocation Decisions		10 years
PX2480	12/28/2017		CRP3-000551415	CRP3-000551420	Proprietary Technical Information		10 years
PX2482	11/2/2017		CRP3-000552029	CRP3-000552035	Proprietary Technical Information		10 years
PX2484	10/14/2017		CRP3-000553281	CRP3-000553282	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2485	10/24/2017		CRP3-000553523	CRP3-000553527	Production and Product Allocation Decisions		10 years
PX2486	9/22/2017		CRP3-000240593	CRP3-000240596	Business Plans and Competitive Strategy		5 years
PX2487	10/6/2017		CRP3-000248365	CRP3-000248379	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2488	12/13/2017		CRP3-000797246	CRP3-000797266	Proprietary Technical Information		10 years
PX2489	1/5/2018		CRP3-00186806	CRP3-00186807	Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2490	12/20/2017		CRP3-000189745	CRP3-000189746	Production and Product Allocation Decisions; Cost Information		10 years
PX2492	1/4/2018		CRP3-000227455	CRP3-000227456	Production and Product Allocation Decisions; Cost Information		10 years
PX2493	9/4/2017		CRP3-000241242	CRP3-000241244	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2495	1/4/2018		CRP3-000531043	CRP3-000531048	Cost Information		5 years
PX2496	12/5/2017		CRP3-000569629	CRP3-000569631	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX5000; RX1063	4/6/2018		PX5000-001	PX5000-171	Product-Level Pricing Information; Business Plans and Competitive Strategy		5 years
PX5001; RX1064	4/6/2018		PX5001-001	PX5001-056	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX6000	12/16/2011		FTC-PROD-0073442	FTC-PROD-0073444	Pricing Strategy; Confidential Financial Information and Forecasts; Litigation Protective Order		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6001	5/22/2012		FTC-PROD-0079534	FTC-PROD-0079543	Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6002	9/20/2011		FTC-PROD-0082452	FTC-PROD-0082455	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6004	1/15/2001		FTC-PROD-0037738	FTC-PROD-0037741	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
PX6005	1/9/2007		FTC-PROD-0037872 FTC-PROD-0037872	FTC-PROD-0037901 FTC-PROD-0037872	Confidential Financial Information and Forecasts; Cost Information; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6006	4/19/2002		FTC-PROD-0038062	FTC-PROD-0038066	Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6007	7/31/2003		FTC-PROD-0038398	FTC-PROD-0038399	Production and Product Allocation Decisions; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6008	8/4/2003		FTC-PROD-0038409	FTC-PROD-0038410	Business Plans and Competitive Strategy; Litigation Protective Order		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6010	8/25/2004		FTC-PROD-0038502	FTC-PROD-0038505	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6011	9/13/2004		FTC-PROD-0038511 FTC-PROD-0038511	FTC-PROD-0038512 FTC-PROD-0038511	Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6012	9/14/2004		FTC-PROD-0038513 FTC-PROD-0038513	FTC-PROD-0038514 FTC-PROD-0038514	Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6013	1/25/2005		FTC-PROD-0038674	FTC-PROD-0038679	Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Customer-Specific Pricing Information; Litigation Protective Order		5 years
PX6014	2/22/2005		FTC-PROD-0038694	FTC-PROD-0038696	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6016	3/8/2005		FTC-PROD-0038847	FTC-PROD-0038854	Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6017	6/16/2006		FTC-PROD-0038981	FTC-PROD-0038984	Litigation Protective Order		In Accordance with Protective Order
PX6018	6/20/2006		FTC-PROD-0038985	FTC-PROD-0038987	Litigation Protective Order		In Accordance with Protective Order

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6019	7/12/2007		FTC-PROD-0039128	FTC-PROD-0039131	Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6020	10/10/2007		FTC-PROD-0039148	FTC-PROD-0039150	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6023	12/14/2007		FTC-PROD-0039168	FTC-PROD-0039169	Pricing Strategy; Litigation Protective Order		5 years
PX6026	6/3/2008		FTC-PROD-0039318	FTC-PROD-0039319	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6029	10/24/2008		FTC-PROD-0039412	FTC-PROD-0039415	Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
PX6030	12/4/2008		FTC-PROD-0046920	FTC-PROD-0046921	Litigation Protective Order		In Accordance with Protective Order
PX6033	9/18/2003		FTC-PROD-0040039	FTC-PROD-0040041	Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6035	10/3/2012		FTC-PROD-0076505	FTC-PROD-0076508	Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6036	9/27/2007		FTC-PROD-0077172	FTC-PROD-0077173	Litigation Protective Order		In Accordance with Protective Order
PX6037	10/6/2006		FTC-PROD-0077184	FTC-PROD-0077186	Litigation Protective Order		In Accordance with Protective Order

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6038	11/21/2002		FTC-PROD-0077226	FTC-PROD-0077228	Litigation Protective Order		In Accordance with Protective Order
PX6039	12/8/2011		FTC-PROD-0077324	FTC-PROD-0077336	Pricing Strategy; Proprietary Technical Information; Business Plans and Competitive Strategy; Litigation Protective Order		10 years
PX6040	4/5/2012		FTC-PROD-0079407	FTC-PROD-0079410	Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
PX6042	9/13/2009		FTC-PROD-0082571	FTC-PROD-0082578	Litigation Protective Order		In Accordance with Protective Order
PX6043	9/2/2008		FTC-PROD-0082983	FTC-PROD-0082984	Pricing Strategy; Litigation Protective Order		5 years
PX6044	5/23/2008		FTC-PROD-0082991	FTC-PROD-0082994	Pricing Strategy; Litigation Protective Order		5 years
PX6045	8/15/2011		FTC-PROD-0083286	FTC-PROD-0083290	Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
PX6046	5/15/2013		FTC-PROD-0090724	FTC-PROD-0090726	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX6047	5/22/2012		CR2R7G-000087834	CR2R7G-000087834	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6049	9/1/2015		FTC-PROD-0064536	FTC-PROD-0064572	Customer-Specific Pricing Information; Litigation Protective Order		5 years
PX6050	4/19/2013		FTC-PROD-0036432	FTC-PROD-0036463	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX7000; RX0179	9/12/2017		PX7000-001	PX7000-066	Pricing Formulas/Models; Customer-Specific Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX7004; RX0177	9/19/2017		PX7004-001	PX7004-047	Pricing Formulas/Models; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX7006; RX0182	9/21/2017		PX7006-001	PX7006-100	Pricing Formulas/Models; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX7008; RX0178	9/26/2017		PX7008-001	PX7008-094	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX7009; RX0142	2/8/2018		PX7009-001	PX7009-077	Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX7010; RX0134	2/2/2018		PX7010-001	PX7010-064	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX7017; RX0124	3/9/2018	[REDACTED]	PX7017-001	PX7017-079	Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX7018; RX0122	3/13/2018	[REDACTED]	PX7018-001	PX7018-071	Pricing Strategy; Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX7032; RX0147	3/22/2018	[REDACTED]	PX7032-001	PX7032-055	Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy; Sensitive Compensation and Benefits Information	[REDACTED]	10 years
PX7037; RX0116	3/21/2018	[REDACTED]	PX7037-001	PX7037-054	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX7042; RX0117	3/27/2018	[REDACTED]	PX7042-001	PX7042-072	Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX7043; RX0129	3/27/2018	[REDACTED]	PX7043-001	PX7043-052	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX7048; RX0148	4/3/2018	[REDACTED]	PX7048-001	PX7048-088	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy	[REDACTED]	10 years
RX0108	August 2017	[REDACTED]	n/a	n/a	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information	[REDACTED]	10 years
RX0606	1/4/2017	[REDACTED]	CR2R-002472206	CR2R-002472211	Business Plans and Competitive Strategy	[REDACTED]	5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0607	4/9/2016		CR2R-002881125	CR2R-002881147	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
RX0608	8/29/2015		CR2R-003724440	CR2R-003724513	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
RX0609	7/14/2014		CR2R-005155734	CR2R-005155862	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
RX0611	11/2/2015		n/a	n/a	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0614	12/22/2016		CR2R-006539202	CR2R-006539246	Cost Information; Proprietary Technical Information		10 years
RX0627	12/21/2012		CR2R7G-000052216		Pricing Strategy; Litigation Protective Order		5 years
RX0628	4/19/2013		CR2R7G-000104207		Litigation Protective Order		In Accordance with Protective Order
RX0630	9/7/2012		CR2R-001034838	CR2R-001034843	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0631	1/17/2015		CR2R-003148835	CR2R-003148839	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0632	1/25/2013		CR2R-003171154	CR2R-003171157	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0634	4/5/2013		CR2R-005643644	CR2R-005643646	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0635	9/1/2016		CR2R-008430653	CR2R-008430654	Customer Negotiations and Internal Customer Strategy		10 years
RX0636	1/8/2015		CR2R-009884583	CR2R-009884584	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0645	10/26/2012 16:54		CR2R-001034563	CR2R-001034567	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0646	1/8/2016 3:02		CR2R-003145104	CR2R-003145107	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
RX0647	10/11/2016 15:29		CR2R-011685708	CR2R-011685712	Customer Negotiations and Internal Customer Strategy		10 years
RX0663	8/5/2015		CR2R-000829360	CR2R-000829367	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0667	11/13/2015		CR2R-002927396	CR2R-002927398	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0668	9/9/2015		CR2R-003725033	CR2R-003725075	Cost Information		5 years
RX0670	9/24/2015		CR2R-008081722	CR2R-008081723	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0671	8/28/2015		CR2R-008082874	CR2R-008082876	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0672	8/3/2015		CR2R-008084550	CR2R-008084552	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0674	6/22/2017		CR2R-011268710	CR2R-011268719	Proprietary Technical Information		10 years
RX0675	10/31/2016		CR2R-000122386	CR2R-000122450	Proprietary Technical Information		10 years
RX0676	4/2/2015		CR2R-000185960	CR2R-000185960	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0679	3/14/2016		CR2R-000776865	CR2R-000776867	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0680	3/20/2015		CR2R-001004863	CR2R-001004867	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0681	2/8/2017		CR2R-001018534	CR2R-001018534	Product-Level Pricing Information; Pricing Strategy		5 years
RX0683	8/1/2016		CR2R-002207635	CR2R-002207636	Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions; Proprietary Technical Information		10 years
RX0684	1/12/2017		CR2R-002472308	CR2R-002472333	Production and Product Allocation Decisions		10 years
RX0685	5/7/2013		CR2R-002631483	CR2R-002631483	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0686	10/16/2015		CR2R-002907954	CR2R-002907958	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0688	6/5/2015		CR2R-003147043	CR2R-003147045	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0690	1/17/2014		CR2R-003169516	CR2R-003169519	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0692	6/11/2015		CR2R-003252551	CR2R-003252569	Business Plans and Competitive Strategy		5 years
RX0693	1/13/2016		CR2R-003266575	CR2R-003266594	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
RX0694	2/5/2015		CR2R-003721050	CR2R-003721083	Pricing Strategy; Confidential Financial Information and Forecasts		5 years
RX0695	5/16/2015		CR2R-003791999	CR2R-003792047	Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0697	4/13/2016		CR2R-004567089	CR2R-004567111	Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy		10 years
RX0698	3/25/2016		CR2R-005454412	CR2R-005454416	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy		10 years
RX0699	12/18/2015		CR2R-005454927	CR2R-005454930	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0701	7/11/2015		CR2R-005629013	CR2R-005629017	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0702	5/8/2015		CR2R-005629223	CR2R-005629226	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0703	4/10/2015		CR2R-005629382	CR2R-005629385	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0704	4/3/2015		CR2R-005629425	CR2R-005629428	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0705	2/6/2015		CR2R-005629640	CR2R-005629644	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0706	1/9/2015		CR2R-005629815	CR2R-005629819	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0707	10/17/2014		CR2R-005641932	CR2R-005641935	Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0708	10/31/2013		CR2R-005651053	CR2R-005651135	Pricing Strategy; Business Plans and Competitive Strategy		5 years
RX0709	8/27/2015		CR2R-008082934	CR2R-008082937	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0710	8/18/2015		CR2R-008083861	CR2R-008083863	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0711	8/14/2015		CR2R-008083938	CR2R-008083940	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0712	7/10/2015		CR2R-008085824	CR2R-008085826	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0713	8/19/2016		CR2R-008120521	CR2R-008120541	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0714	8/6/2017		CR2R-010627621	CR2R-010627631	Cost Information		5 years
RX0715	5/24/2017		CR2R-010628331	CR2R-010628357	Confidential Financial Information and Forecasts; Cost Information; Business Plans and Competitive Strategy		5 years
RX0716	8/6/2015		CR2R-011581942	CR2R-011581944	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0717	10/10/2016		CR2R-011650954	CR2R-011650981	Product-Level Pricing Information; Pricing Strategy; Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
RX0718	1/8/2016		CR2R-011674330	CR2R-011674347	Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0725	September 2017		n/a	n/a	Confidential Financial Information and Forecasts		5 years
RX0726	7/9/1905		n/a	n/a	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
RX0728	9/20/2016		CR2R-005252392	CR2R-005252408	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0760	6/28/2012 9:30		CR2R7G-000062352	CR2R7G-000062720	Litigation Protective Order		In Accordance with Protective Order
RX0772	3/12/2012		CR2R-000316937	CR2R-000316950	Customer-Specific Pricing Information; Pricing Strategy		5 years
RX0773	8/15/2014		CR2R-000372030	CR2R-000372033	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0776	5/27/2016		CR2R-000747511	CR2R-000747513	Production and Product Allocation Decisions		10 years
RX0777	11/6/2015		CR2R-000778788	CR2R-000778795	Product-Level Pricing Information; Pricing Strategy; Business Plans and Competitive Strategy		5 years
RX0779	9/1/2016		CR2R-000788715	CR2R-000788716	Customer Negotiations and Internal Customer Strategy		10 years
RX0780	8/13/2015		CR2R-000802519	CR2R-000802520	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0781	2/4/2016		CR2R-000814970	CR2R-000814973	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0786	12/7/2016		CR2R-000985508	CR2R-000985510	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0788	8/31/2015		CR2R-001026810	CR2R-001026812	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0790	10/11/2013		CR2R-001033505	CR2R-001033508	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0791	5/2/2013		CR2R-001042166	CR2R-001042169	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0792	12/1/2014		CR2R-001055977	CR2R-001055979	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0800	11/5/2014		CR2R-001203434	CR2R-001203435	Customer-Specific Pricing Information; Business Plans and Competitive Strategy		5 years
RX0801	2/17/2014		CR2R-001237840	CR2R-001237855	Product-Level Pricing Information; Production and Product Allocation Decisions		5 years
RX0802	5/23/2013		CR2R-001344285	CR2R-001344286	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0804	11/4/2012		CR2R-001355683	CR2R-001355685	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0805	5/18/2012		CR2R-001451191	CR2R-001451194	Customer-Specific Pricing Information; Pricing Strategy		5 years
RX0806	4/20/2015		CR2R-001486282	CR2R-001486285	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0807	10/30/2015		CR2R-001537323	CR2R-001537324	Pricing Strategy; Business Plans and Competitive Strategy		5 years
RX0808	10/16/2014		CR2R-001553529	CR2R-001553531	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0809	5/23/2015		CR2R-001570268	CR2R-001570272	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions		10 years
RX0816	9/15/2015		CR2R-001967997	CR2R-001968000	Customer Negotiations and Internal Customer Strategy		10 years
RX0817	7/6/2016		CR2R-001981003	CR2R-001981008	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0818	8/23/2016		CR2R-001983755	CR2R-001983755	Production and Product Allocation Decisions; Cost Information		10 years
RX0819	8/15/2014		CR2R-002074884	CR2R-002074888	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0820	5/29/2015		CR2R-002095355	CR2R-002095356	Pricing Strategy		5 years
RX0822	8/23/2016		CR2R-002104671	CR2R-002104671	Proprietary Technical Information		10 years
RX0824	12/6/2016		CR2R-002176747	CR2R-002176797	Proprietary Technical Information		10 years
RX0825	8/24/2016		CR2R-002206713	CR2R-002206713	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
RX0827	5/11/2016		CR2R-002210668	CR2R-002210671	Business Plans and Competitive Strategy		5 years
RX0828	6/30/2016		CR2R-002270157	CR2R-002270158	Business Plans and Competitive Strategy		5 years
RX0829	5/27/2016		CR2R-002270806	CR2R-002270807	Proprietary Technical Information		10 years
RX0831	5/1/2015		CR2R-002276731	CR2R-002276736	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0832	9/15/2014		CR2R-002351999	CR2R-002352000	Customer-Specific Pricing Information; Pricing Strategy		5 years
RX0833	1/6/2012		CR2R-002672192	CR2R-002672195	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0834	1/24/2014		CR2R-003185104	CR2R-003185105	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0835	12/14/2015		CR2R-004545272	CR2R-004545289	Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0836	10/9/2013		CR2R-005003401	CR2R-005003403	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0837	7/15/2013		CR2R-005004720	CR2R-005004721	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0838	6/19/2014		CR2R-005020359	CR2R-005020360	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0839	3/9/2017		CR2R-005150472	CR2R-005150490	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
RX0840	6/10/2015		CR2R-005161117	CR2R-005161143	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
RX0841	12/6/2016		CR2R-005163929	CR2R-005163941	Business Plans and Competitive Strategy		5 years
RX0842	12/2/2015		CR2R-005205821	CR2R-005205964	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
RX0845	5/31/2017		CR2R-005398198	CR2R-005398199	Cost Information; Business Plans and Competitive Strategy		5 years
RX0847	7/8/2016		CR2R-005458758	CR2R-005458807	Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0848	7/27/2015		CR2R-005637336	CR2R-005637337	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0849	9/26/2014		CR2R-005729539	CR2R-005729542	Customer Negotiations and Internal Customer Strategy		5 years
RX0851	8/21/2016		CR2R-006560000	CR2R-006560003	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
RX0853	1/16/2014		CR2R-006863807	CR2R-006863812	Proprietary Technical Information		10 years
RX0854	9/10/2015		CR2R-006953906	CR2R-006953908	Production and Product Allocation Decisions		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0856	6/23/2015		CR2R-007872924	CR2R-007872933	Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0857	5/30/2017		CR2R-008391190	CR2R-008391191	Proprietary Technical Information		10 years
RX0858	12/9/2016		CR2R-008476693	CR2R-008476694	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0860	1/22/2017		CR2R-008698260	CR2R-008698260	Business Plans and Competitive Strategy		5 years
RX0861	6/8/2017		CR2R-010501622	CR2R-010501707	Business Plans and Competitive Strategy		5 years
RX0862	4/19/2016 0:00		CR2R-011014502	CR2R-011014542	Confidential Financial Information and Forecasts; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0863	9/21/2016		CR2R-011527653	CR2R-011527669	Production and Product Allocation Decisions; Cost Information		10 years
RX0864	2/11/2015		CR2R-011598686	CR2R-011598724	Pricing Strategy; Cost Information		5 years
RX0865	12/17/2017		CRP3-000219749	CRP3-000219751	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
RX0867	8/26/2017		CRP3-000238796	CRP3-000238797	Business Plans and Competitive Strategy		5 years
RX0869	12/13/2017		CRP3-000516627	CRP3-000516628	Business Plans and Competitive Strategy		5 years
RX0870	9/25/2017		CRP3-000626674	CRP3-000626707	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0896	5/3/2012		CR2R7G-000084763	CR2R7G-000084963	Litigation Protective Order		In Accordance with Protective Order
RX1019	6/12/2015		CR2R7G-000002901	CR2R7G-000003264	Pricing Strategy; Litigation Protective Order		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX1022	4/10/2015		CR2R7G-000008663	CR2R7G-000008728	Pricing Strategy; Litigation Protective Order		5 years
RX1023	4/25/2016		CR2R7G-000008787	CR2R7G-000008839	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		In Accordance with Protective Order
RX1024	7/17/2015		CR2R7G-000009013	CR2R7G-000009020	Litigation Protective Order		In Accordance with Protective Order
RX1025	1/22/2015		CR2R7G-000010398	CR2R7G-000010472	Litigation Protective Order		In Accordance with Protective Order
RX1026	7/26/2011		CR2R7G-000012592	CR2R7G-000012604	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		In Accordance with Protective Order
RX1027	1/5/2012		CR2R7G-000012869	CR2R7G-000012870	Litigation Protective Order		In Accordance with Protective Order
RX1028	1/6/2012		CR2R7G-000012874	CR2R7G-000012878	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
RX1029	1/9/2012		CR2R7G-000012879	CR2R7G-000012880	Litigation Protective Order		In Accordance with Protective Order
RX1030	1/5/2012		CR2R7G-000012891	CR2R7G-000012892	Litigation Protective Order		In Accordance with Protective Order
RX1031	12/12/2011		CR2R7G-000012893	CR2R7G-000012894	Litigation Protective Order		In Accordance with Protective Order
RX1032	4/25/2016		CR2R7G-000012941	CR2R7G-000013008	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX1034	2/3/2015		CR2R7G-000018822	CR2R7G-000019161	Litigation Protective Order		In Accordance with Protective Order
RX1035	12/21/2012		CR2R7G-000049709	CR2R7G-000049841	Pricing Strategy; Litigation Protective Order		In Accordance with Protective Order
RX1036	12/21/2012		CR2R7G-000049842	CR2R7G-000050001	Litigation Protective Order		In Accordance with Protective Order
RX1037	12/21/2012		CR2R7G-000050002	CR2R7G-000050267	Pricing Strategy; Litigation Protective Order		5 years
RX1038	2/05/2013		CR2R7G-000052086	CR2R7G-000052090	Pricing Strategy; Litigation Protective Order		5 years
RX1039	3/27/2012		CR2R7G-000080708	CR2R7G-000081154	Litigation Protective Order		In Accordance with Protective Order
RX1040	4/24/2012		CR2R7G-000083993	CR2R7G-000084246	Litigation Protective Order		In Accordance with Protective Order
RX1115	1/24/2012		CR2R-000695598	CR2R-000695598	Confidential Financial Information and Forecasts		5 years
RX1116	10/19/2012		CR2R-001134941	CR2R-001134944	Business Plans and Competitive Strategy		5 years
RX1117	2/27/2015		CR2R-007651679	CR2R-007651719	Confidential Financial Information and Forecasts; Cost Information; Business Plans and Competitive Strategy		5 years
RX1120	3/03/2018		CRP3-000866618	CRP3-000866618	Production and Product Allocation Decisions		10 years
RX1254	11/02/2015		CR2R-011271887	CR2R-011271975	Business Plans and Competitive Strategy		5 years

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EXHIBIT 2

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UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

The Valspar Corporation and
Valspar Sourcing, Inc.,

Plaintiffs,

vs.

PROTECTIVE ORDER

Kronos Worldwide, Inc., and
Millennium Inorganic Chemicals, Inc.,

Defendants.

Court File No. 13-3214 (RHK/LIB)

Upon consideration of the Stipulation of the parties [Docket No. 113] as modified by this Court in accordance with Fed. R. Civ. P. 26(c), it is --

HEREBY ORDERED that:

1. This Protective Order (“Order”) shall apply to all documents, records, tangible materials and other information produced, served, or disclosed in this action from the inception of the case until its conclusion, including all appeals. Material designated as “Confidential” or “Attorneys Eyes Only” shall remain “Confidential” or “Attorneys Eyes Only” thereafter, and the Parties agree that the Court shall retain continuing jurisdiction during the balance of this action and after its conclusion to enforce this Order.

2. As used in this Order, these terms have the following meanings:

- a. “Attorneys” means counsel of record;
- b. “Attorneys Eyes Only” Information or Items means information that consists of or documents that contain:
 - (1) highly sensitive financial, sales, pricing, marketing and/or strategic business planning

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information for the period January, 2011 through the date of trial in this action, including, but not limited to, raw material pricing and supplier negotiations and communications, purchasing strategies, non-public customer communications, pricing, and information, non-public company financial information, forecasts, strategy or similar information; or

(2) paint formulas.

c. “Confidential” documents are documents designated pursuant to paragraph 3;

d. “Documents” are all materials produced in the course of discovery, all Answers to Interrogatories, all Answers to Requests for Admission, all Responses to Requests for Production of Documents, all deposition testimony and deposition exhibits, all expert reports and exhibits thereto, and filings and pleadings;

e. “Minnesota Action” means the above-captioned matter styled *The Valspar Corporation et al. v. Kronos Worldwide, Inc., et al.*, Case No. 13-3214 (RHK/LIB).

f. “Texas Action” means the case styled as *The Valspar Corporation et al. v. Huntsman International LLC*, Case No. 4:14-cv-01130, venued in the United States District Court for the Southern District of Texas.

g. “Delaware Action” means the case styled as *The Valspar Corporation et al. v. E. I. DuPont de Nemours*, Case No. 1:14-cv-00527, venued in the United States District Court for the District of Delaware.

h. “Outside Vendors” means messenger, copy, coding, and other clerical-services vendors not employed by a party or its Attorneys;

i. “Related Action” means the Texas Action, the Delaware Action, and any subsequent cases or proceedings that the Parties agree should be treated as “Related Actions” for the purposes of this Protective Order.

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j. “Written Assurance” means an executed document in the form attached as **Exhibit A**.

3. A Party may designate a document “Confidential” to protect Documents that a Party or third party believes in good faith to contain confidential commercial, proprietary, financial or business information, trade secrets, private or personal information, or other confidential research, development, regulatory or commercial information which is, by its nature, confidential.

4. Documents shall be designated as “Confidential” by placing or affixing on the document, in a manner which shall not interfere with its legibility, the notation “CONFIDENTIAL.” Documents bearing the notation “CONFIDENTIAL 13-3214 (RHK/LIB)” or similar notations are deemed notated as “CONFIDENTIAL” for the purposes of this Order. Electronic or native documents or data shall be similarly marked where practicable, and where not practicable, written notification by a producing party that it is producing Documents designated as “Confidential” shall suffice. Solely for the purposes of the efficient and timely production of documents, and to avoid the need for a detailed and expensive confidentiality examination of documents the disclosure of which is not likely to become an issue, a producing party may initially designate as “Confidential” any Document that is not publicly available.

5. All “Confidential” or “Attorneys Eyes Only” documents, along with the information contained in the documents, shall be used solely for the purpose of the Minnesota Action or any Related Action, and shall not be used for any other purpose, including, without limitation, any business or commercial purpose, or dissemination to the media. No person receiving such documents shall, directly or indirectly, use, transfer, disclose, or communicate in any way the

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documents or their contents to any person other than those specified in paragraph 6 and 7. Any other use or communication is prohibited.

6. Access to any “Confidential” document shall be limited to:
 - a. outside counsel, including any attorney of a law firm designated as attorneys of record in the Minnesota Action, as well as paralegals, secretaries, and clerical staff working with such attorneys, and Outside Vendors providing services to such attorneys, such as copying services;
 - b. in-house litigation attorneys and paralegals for any Party;
 - c. independent (i.e., non-employee) persons retained by a Party or its Attorney solely for the purpose of assisting counsel of record in the prosecution, defense or settlement of this action, such as independent experts, consultants, investigators, mock jurors, focus groups, or consultants, but only in accordance with the provisions of paragraph 10 hereof;
 - d. the Court, the Court’s staff attorney(s), and judicial assistants of the Court;
 - e. court reporters and videographers;
 - f. any person identified within a specific document, including the author, addressee, or recipient of the document, or any other person who has or would have had access to the information contained in the document by virtue of his/her employment, provided that if such person is not a party’s current employee, officer or director, such person must agree to be bound by the terms of this Order;
 - g. any former employee of a party may see documents produced by his or her former employer.
 - h. Two employees of a party required in good faith to provide material assistance in the conduct of the litigation of the Minnesota Action or a Related Action. Each party will provide advance notice to all parties of the identity of those employees. If a producing party objects, the employees at issue may not view that producing party’s

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“Confidential” information, provided that the designating party may seek relief from the Court following a good faith meet and confer effort with the producing party to resolve the objection. In the event that any party desires to designate additional employees to provide material assistance in the conduct of the litigation of the Minnesota Action or a Related Action, the parties shall meet and confer regarding the designation of additional employees. If, following a good faith meet and confer effort, the parties cannot agree that additional employees may be designated, the requesting party may seek a subsequent order of this Court;

i. any other person designated by written agreement between the Parties or by subsequent order of this Court after reasonable notice to all Parties.

7. Access to any “Attorneys Eyes Only” document shall be limited to:

a. outside counsel, including any attorney of a law firm designated as attorneys of record in the Minnesota Action, as well as paralegals, secretaries and clerical staff working with such attorneys, and Outside Vendors providing services to such attorneys, such as copying services;

b. in-house litigation attorneys and paralegals for the parties;

c. independent (i.e., non-employee) persons retained by a Party or its Attorney solely for the purpose of assisting counsel of record in the prosecution, defense or settlement of this action, such as independent experts, consultants, investigators, mock jurors, focus groups, or consultants, but only in accordance with the provisions of paragraph 10 hereof;

d. the Court, the Court’s staff attorney(s), and judicial assistants of the Court;

e. court reporters and videographers;

f. any person identified within a specific document, including the author, addressee, or recipient of the document, or any other person who has or would have had access to the information contained in the document by virtue of his/her employment, provided that if such person is not a party’s current employee, officer or

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director, such person must agree to be bound by the terms of this Order;

g. any former employee of a party may see documents produced by his or her former employer;

h. any other person designated by written agreement between the Parties or by subsequent order of this Court after reasonable notice to all Parties.

8. Third parties producing documents in the course of this action may also designate documents as “Confidential,” or “Attorneys Eyes Only,” subject to the same protections and constraints as the parties to the action. A copy of the Protective Order shall be served along with any subpoena served in connection with this action. All documents produced by such third parties shall be treated as “Confidential” or “Attorneys Eyes Only” for a period of fourteen (14) business days from the date of their production, and during that period any party may designate such documents as “Confidential” or “Attorneys Eyes Only” pursuant to the terms of the Protective Order.

9. A Party that has previously produced information to another party in connection with this action may designate such information as “Confidential.” Such designation shall be made within fourteen (14) business days of the entry of this Order, and in the meantime, Parties shall treat all material as designated. The previous disclosure of materials not previously designated as “Confidential” shall not be actionable, provided that no additional disclosure of those materials occurs in violation of this Order.

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10. Each person appropriately designated pursuant to paragraphs 6(c), (f), (g), (h), or (i) and/or paragraphs 7(c), (f), (g), or (h) to receive “Confidential” or “Attorneys Eyes Only” information shall execute a “Written Assurance” in the form attached as **Exhibit A**.

11. All depositions or portions of depositions taken in this action that contain Confidential or Attorneys Eyes Only information may be designated “Confidential” or “Attorneys Eyes Only” and thereby obtain the protections accorded other “Confidential” or “Attorneys Eyes Only” documents. Confidentiality designations for depositions shall be made either on the record or by written notice to the other party within fourteen (14) business days of receipt of the transcript. Unless otherwise agreed, depositions shall be treated as “Confidential” or “Attorneys Eyes Only” during the 14-day period following receipt of the transcript. The deposition of any witness (or any portion of such deposition) that encompasses “Confidential” or “Attorneys Eyes Only” information shall be taken only in the presence of persons who are qualified to have access to such information. To the extent a party believes it is reasonably necessary for a noticed deponent or a person designated pursuant to Fed. R. Civ. P. 30(b)(6) to review documents or information marked “Confidential” to which that witness would not otherwise be permitted access in accordance with this Order in order to prepare testimony in connection with the Minnesota Action, the requesting party shall give notice to all parties 14 business days in advance of disclosure of the Confidential information and the name of the witness to whom the disclosure is sought to be made. The producing party has seven (7) business days in which to object in writing to the request. Absent objection, and upon execution by the witness of Exhibit A, the witness may review the “Confidential” documents and information identified in the notice for the limited purpose of

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preparing testimony for deposition. If the producing party objects to the disclosure, the parties shall meet and confer regarding the request for disclosure. If, following a good faith meet and confer effort, the parties cannot agree, the requesting party may seek a subsequent order of this Court.

12. Any party who inadvertently fails to identify documents as “Confidential” or “Attorneys Eyes Only” shall, promptly upon discovery of its oversight, provide written notice of the error and substitute appropriately-designated documents. Any party receiving such improperly-designated documents shall retrieve such documents from persons not entitled to receive those documents and, upon receipt of the substitute documents, shall return or destroy the improperly-designated documents.

13. Documents, including, without limitation, those designated as “Confidential” or “Attorneys Eyes Only” under this Order, shall not be copied or otherwise reproduced except to the extent such copying or reproduction is reasonably necessary for permitted uses in the Minnesota Action or Related Actions. The protections conferred by this Order cover not only Documents, including, without limitation, those designated as “Confidential” or “Attorneys Eyes Only,” but also any information copied or extracted there from, as well as all copies, excerpts, summaries, or compilations thereof (hereinafter referred to collectively as “copies”), testimony, conversations, or presentations by parties or counsel to or in court or in other settings that might reveal the contents of Documents, including, without limitation, those designated as “Confidential” or “Attorneys Eyes Only.” However, reports of statistical experts that rely upon data that has been designated as “Confidential” or “Attorneys Eyes Only,” but that do not reveal an individual party’s data, are not deemed to contain “Confidential” or “Attorneys Eyes Only” information if aggregated with two or

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more other parties' data. All copies of documents or information designated as "Confidential" or "Attorneys Eyes Only" under this Order or any portion thereof, shall be affixed with the notation "CONFIDENTIAL" or "ATTORNEYS EYES ONLY" if that notation does not already appear.

14. No information may be withheld from discovery on the ground that the material to be disclosed requires protection greater than that afforded by this Order unless the party claiming a need for greater protection first makes a formal motion and establishes good cause for an Order providing such greater protections pursuant to Fed. R. Civ. P. 26(c).

15. If a party files documents with the Court containing information designated as protected pursuant to the terms of this Order, the filings must be in compliance with the Electronic Case Filing Procedures for the District of Minnesota. The parties are advised that designation by a party of a document as protected pursuant to the terms of this Order cannot be used as the sole basis for filing the document under seal in connection with either trial or a nondispositive, dispositive, or trial related motion. Only those documents and portions of a party's submission, or any part thereof, which otherwise meets requirements for protection from public filing (including, but not limited to, a statute, rule or regulation prohibiting public disclosure, or protection under the attorney-client privilege or work product doctrine, or the standards for protection set forth in Fed. R. Civ. P. 26(c)), as first determined by the Court upon motion and a showing of good cause, shall be filed under seal. If a party intends to file with the Court a document designated by another party as protected pursuant to the terms of this Order, then that filing party shall provide reasonable advance notice to the designating party of such intent so that the designating party may determine whether or not they should bring a motion before the Court which seeks to require the protected

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documents to be filed under seal. Any party which seeks to assert that a document should be filed with the Court under seal shall have the burden of demonstrating that the document should be filed under seal.

16. Any party may challenge the designation of any information designated “Confidential” or “Attorneys Eyes Only.” The challenging party shall identify in writing and with specificity (i.e., by document control numbers, deposition transcript page and line reference, or other means sufficient to easily locate such materials) the document(s) for which it seeks to challenge the “Confidential” or “Attorneys Eyes Only” designation. A designation challenge will trigger an obligation on the part of the producing party to make a good faith determination of whether the designation is justified. Except in the case of a designation challenge for more than 20 documents or more than 25 pages of deposition testimony, within ten (10) business days the producing party shall respond in writing to the designation challenge either agreeing to de-designate the “Confidential” or “Attorneys Eyes Only” document at issue or provide the challenging party an explanation for the designation. If a designation challenge entails more than 20 documents or more than 25 pages of deposition testimony, the challenging party and the producing party shall meet and confer, in good faith, to establish a reasonable timeframe for designation and response.

If the challenging party disagrees with a producing party’s designation of material as “Confidential” or “Attorneys Eyes Only” following a designation challenge, it may move the Court for relief from the Protective Order as to the contested designation(s), providing notice to any third party whose designation of produced documents as “Confidential” or “Attorneys Eyes Only” in the action may be affected. The party asserting that the material is “Confidential” or “Attorneys Eyes

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Only” shall have the burden of proving that the information in question is within the scope of protection afforded by Fed. R. Civ. P. 26(c). No presumption or weight will attach to the initial designation of a document as “Confidential” or “Attorneys Eyes Only.”

Pending a ruling, the challenged material shall continue to be treated as “Confidential” or “Attorneys Eyes Only” under the terms of this Protective Order. With respect to material the parties agree is not “Confidential” or “Attorneys Eyes Only” or which the Court orders not to be treated as “Confidential” or “Attorneys Eyes Only” within ten (10) business days of such agreement or order, the producing party shall produce a new version with the confidentiality notation redacted.

Nothing in this Protective Order shall be deemed to prevent a producing party from arguing during the determination process for limits on the use or manner of dissemination of material that is found to no longer to be “Confidential” or “Attorneys Eyes Only.”

A Party shall not be obligated to challenge the propriety of a designation by another party of material as “Confidential” or “Attorneys Eyes Only” at the time such designation is made, and a failure to make any such challenge shall not preclude a subsequent challenge by such Party to such designation.

17. Within sixty (60) days of the termination of this action in its entirety, including any appeals, each party shall either destroy or return to the opposing party all documents designated by the opposing party as “Confidential” or “Attorneys Eyes Only,” and all copies of such documents, and shall destroy all extracts and/or data taken from such documents. Each party shall provide a certification as to such return or destruction within the 60-day period. Notwithstanding this provision, Attorneys are entitled to retain an archival copy of all pleadings, motion papers,

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transcripts, legal memoranda, correspondence, or attorney work product, even if such materials contain “Confidential” information. Any such archival copies that contain or constitute Documents, including, without limitation, those designated as “Confidential” or “Attorneys Eyes Only” remain subject to this Order.

18. Any party may apply to the Court for a modification of the Protective Order, and nothing in this Protective Order shall be construed to prevent a party from seeking such further provisions enhancing or limiting confidentiality as may be appropriate.

19. The stipulation to the terms of this Protective Order or any action taken in accordance with the Protective Order shall not be construed as a waiver of any claim or defense in the action or of any position as to discoverability or admissibility of evidence.

20. Nothing in this Order shall require disclosure of any document that a Party contends are protected from disclosure by the attorney-client privilege, joint defense privilege, work-product doctrine, or any other legally recognized privilege (“Privileged Document”). The inadvertent production of any Privileged Document shall be without prejudice to any claim that such material is privileged under the attorney-client privilege, joint defense privilege, work-product doctrine or any other legally recognized privilege, and no Party shall be held to have waived any rights by such inadvertent production. Any Privileged Document that the producing party deems to have been inadvertently disclosed shall be, upon written request, returned to the producing party within five (5) business days, or destroyed, at that party’s option. If the producing party demands that the inadvertently disclosed Privileged Document also be destroyed from the original media in which it was produced, the producing party will provide duplicate media not containing the inadvertently

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disclosed Privileged Document and a revised privilege log within seven (7) business days of return or notice of destruction. If the claim that the material qualifies as Privileged Document is disputed, the party disputing the assertion may maintain a single copy of the materials pending a judicial determination of the matter pursuant to Fed. R. Civ. P. 26(b)(5)(B) and Fed. R. Evid. 502.

21. Nothing shall prevent disclosure beyond the terms of this Order if the Party designating the material as “Confidential” or “Attorneys Eyes Only” consents in writing to such disclosure or if this Court, after notice to all affected parties, orders such disclosure.

22. If any person receiving documents covered by this Order: (a) is subpoenaed in another action or proceeding; (b) is served with a demand in another action or proceeding to which the person or entity is a party or is otherwise involved; (c) received an open records or public information request; or (d) is served with any other process by one not a party to this litigation, which seeks material designated as “Confidential” or “Attorneys Eyes Only” by someone other than the receiving party, then the receiving party shall give actual written notice within five (5) business days of receipt of such subpoena, demand or process, to those who designated the material “Confidential” or “Attorneys Eyes Only.” The receiving party shall not produce any of the “Confidential” or “Attorneys Eyes Only” information for a period of at least fourteen (14) business days, or within such lesser time period as set forth in the subpoena, demand or process or as ordered by a court (the “Response Period”), after providing the required notice to the designating party. If, within the Response Period, the designating party gives notice to the receiving party that the designating party opposes production, the receiving party shall not thereafter produce such information except pursuant to a court order requiring compliance with the subpoena, demand or

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other process. The designating party shall be solely responsible for asserting any objection to the requested production. Nothing herein shall be construed as requiring the receiving party or anyone else covered by this Order to appeal any order requiring production of “Confidential” or “Attorneys Eyes Only” information covered by this Order, or to subject himself, herself, or itself to any penalties for non compliance with any legal process order or to seek any relief from the Court.

23. In the event that any Party is served with a court order, and/or administrative or regulatory order to compel production or disclosure of any documents, materials, papers, or things that have been designated “Confidential” or “Attorneys Eyes Only,” that Party shall notify, in writing, counsel of record for the other Parties to this Order within five (5) business days of the receipt of such process or order.

24. Nothing contained herein shall prevent any party from using “Confidential” or “Attorneys Eyes Only” information for a trial in this Action. The Parties agree to meet and confer prior to the filing of final exhibit lists to evaluate which of the proposed exhibits require confidential treatment for purposes of trial, if any. The confidentiality notation may be redacted by the producing party prior to trial for any use of the material at trial by any party. The parties further agree to meet and confer with any third party whose documents will or may be used at trial concerning their appropriate treatment and to afford such third parties sufficient advance notice of any such use such that they can move to have the materials received under seal. Should any material furnished by a third party and received under seal be the subject of a motion to unseal, the parties shall give sufficient notice to the third party so that it may oppose the motion.

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25. The parties agree that any disclosure of “Confidential” or “Attorneys Eyes Only” information contrary to the terms of this Order by a party or anyone acting on its, his or her behalf constitutes a violation of the Order remediable by this Court, regardless of where the disclosure occurs.

26. Any subsequent party to the litigation will be bound by this Order.

27. The obligations imposed by the Protective Order shall survive the termination of this action.

BY THE COURT:

DATED: July 7, 2014

s/Leo I. Brisbois
Leo I. Brisbois
U.S. MAGISTRATE JUDGE

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EXHIBIT A
ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND

I, _____ [print or type full name], of _____ [print or type full address], declare under penalty of perjury that I have read in its entirety and understand the Protective Order that was issued by the United States District Court for the Central District of Minnesota on _____ in the case of *THE VALSPAR CORPORATION, et al., v. KRONOS WORLDWIDE, INC., et al.*, Case No. 13-3214 (RHK/LIB). I agree to comply with and to be bound by all the terms of this Protective Order and I understand and acknowledge that failure to so comply could expose me to sanctions and punishment in the nature of contempt. I solemnly promise that I will not disclose in any manner any information or item that is subject to this Protective Order to any person or entity except in strict compliance with the provisions of this Order.

I further agree to submit to the jurisdiction of the United States District Court for the District of Minnesota for the purpose of enforcing the terms of this Stipulated Protective Order, even if such enforcement proceedings occur after termination of this action.

I acknowledge that I am to retain all copies of any of the materials that I receive that have been designated as “CONFIDENTIAL” or “ATTORNEYS EYES ONLY” in a matter consistent with this Order, and that all such copies are to be returned or destroyed as specified in this Order on the termination of this litigation or the completion of my dues in connection with this litigation.

I have provided in the form below either (i) my current home address and phone number, or (ii) in lieu of providing my address and phone number, I hereby appoint

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_____ [print or type full name] as my
Minnesota agent for service of process in connection with this action or any proceedings related to
enforcement of this Protective Order.

Date: _____, 2014

City and State where sworn and signed: _____

Printed name: _____
[print name]

Signature: _____
[signature]

Signatory's or appointed agent's address:

Signatory's or appointed agent's phone number: _____

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EXHIBIT 3

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UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Northern Division)

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2011 SEP 22 PM 1:50

CLERK'S OFFICE
AT BALTIMORE

BY _____ DEPUTY

IN RE TITANIUM DIOXIDE ANTITRUST LITIGATION
THIS DOCUMENT RELATES TO: ALL ACTIONS

Master Docket No. 10-CV-00318-RDB

**STIPULATED
PROTECTIVE ORDER REGARDING CONFIDENTIALITY OF DISCOVERY
MATERIAL AND INADVERTENT DISCLOSURE OF PRIVILEGED MATERIAL
(Local Rule 104.13)**

WHEREAS, Plaintiffs Haley Paint Company and Isaac Industries, Inc. on behalf of themselves and all others similarly situated, and Defendants E.I. DuPont de Nemours and Company, Huntsman International LLC, Kronos Worldwide, Inc., and Millennium Inorganic Chemicals Inc. are parties in the above-styled action (the "Action");

WHEREAS, the preparation for trial of the Action may require the discovery and use of documents and other information which constitute or contain commercial or technical trade secrets, or other confidential information the disclosure of which would be competitively harmful to the producing party;

WHEREAS, the parties anticipate that the Action will involve the production of a significant volume of documents among and between actual and potential competitors and their customers;

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WHEREAS, a number of third parties will or may become the subject of document and deposition discovery in these actions; and

WHEREAS, the parties and their counsel agree that their interests, the interests of the customers of the corporate parties and of other third parties that may be requested to provide discovery, and the public interest can be accommodated by a stipulation and order facilitating a timely production and appropriately limiting the use and dissemination of proprietary and competitively sensitive non-public discovery information entitled to confidential treatment.

Accordingly, it is this 21st day of September, 2011, by the United States District Court for the District of Maryland, **ORDERED**:

1. Use of Discovery Material. All documents produced in the course of discovery, all Answers to Interrogatories, all Answers to Requests for Admission, all Responses to Requests for Production of Documents, and all deposition testimony and deposition exhibits (hereinafter "Discovery Material") shall be subject to this Order, including, without limitation, its provisions concerning Confidential Information, as set forth below. Discovery Material designated as Confidential Information under this Order shall be used solely for purposes of the Action in accordance with this Order, and shall not be used for any other purpose, including, without limitation, any business or commercial purpose, or dissemination to the media.

2. Confidential Information. "Confidential Information" shall mean sensitive personal information, trade secrets or other current confidential research, development, or commercial information which is in fact confidential.

3. Designation of Discovery Materials as Confidential Information.

a) The designation of Discovery Material as Confidential Information shall be made by placing or affixing on the document, in a manner which will not interfere with its

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legibility, the notation "CONFIDENTIAL - 1:10-cv-00318-RDB." By agreeing to this Order, no party waives the right to challenge any other party's designation. Electronic or native documents or data shall be similarly marked where practicable, and where not practicable, written notification by a producing party that it is producing Discovery Material as Confidential Information shall suffice. Solely for the purposes of the efficient and timely production of documents, and to avoid the need for a detailed and expensive confidentiality examination of documents the disclosure of which is not likely to become an issue, a producing party may initially designate as Confidential Information any Discovery Material that is not publicly available. This designation shall control unless and until a challenge is made by a receiving party under Paragraph 6.

b) Portions of depositions of a party's present and former officers, directors, employees, agents, experts, and representatives shall be deemed confidential only if they are designated as such when the deposition is taken or within seven (7) business days after receipt of the transcript. Any testimony which describes a document which has been designated as Confidential Information as described above shall also be deemed to be designated as Confidential Information.

c) If it comes to a party's attention that information or items that it designated as Confidential Information under this Order do not qualify for that protection, that party must promptly notify all other parties that it is withdrawing the mistaken designation.

d) The parties and counsel for the parties in this Action shall not disclose or permit the disclosure of Confidential Information under this Order to any person or entity, except that, solely for purposes of this Action, disclosures may be made in the following circumstances:

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i. Disclosure may be made to outside counsel and employees of outside counsel for the parties who have direct functional responsibility for the preparation and trial of the Action.

ii. Disclosure may be made to the Court and its personnel.

iii. Disclosure may be made to Court reporters, their staffs, and professional vendors to whom disclosure is reasonably necessary. Prior to disclosure to any such court reporter, staff, or professional vendor, such person must agree to be bound by the terms of this Order.

iv. Disclosure may be made to consultants, investigators, or experts (hereinafter referred to collectively as "experts") employed by the parties or counsel for the parties to assist in the preparation and trial of the Action. Prior to disclosure to any expert, the expert must be informed of and agree in writing to be subject to the provisions of this Order by executing a copy of Exhibit A. Further, any expert receiving Confidential Information shall:

(A) Maintain such Confidential Information in a manner calculated to prevent its public disclosure;

(B) Return such Confidential Information to counsel for the party that retained such expert within ninety (90) days of the conclusion of the expert's assignment or retention, but in no event shall the expert retain documents beyond the period set out in Paragraph 9 herein;

(C) Not disclose such Confidential Information to anyone, or use such Confidential Information, except as permitted by the Protective Order;

(D) Submit to the jurisdiction of this Court for purposes of enforcing the Protective Order; and

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(E) Use such Confidential Information and the information contained therein solely for the purpose of rendering consulting services to a party to this Action, including providing testimony in this Action.

v. Disclosure may be made to in-house litigation counsel.

vi. Disclosure may be made to one employee of a party required in good faith to provide material assistance in the conduct of the litigation of the Action. Each party will provide advance notice to all parties of that employee's identity. If a producing party objects, the employee at issue may not view that producing party's Confidential Information, provided that the designating party may seek relief from the Court following a good faith meet and confer effort with the producing party to resolve the objection.

vii. Disclosure may be made to any person identified within a specific document, including the author, addressee, or recipient of the document, or any other person who would have had access to the information contained in the document by virtue of his/her employment, provided that if such person is not a party's current employee, officer or director, such person must agree to be bound by the terms of this Order.

viii. Disclosure of a producing party's document may be made to (a) current employees of that producing party, and (b) former employees of that producing party, so long as the former employee is not a current employee of another party or a competitor, but may not be made to other persons, unless one or more of the foregoing paragraphs permit disclosure to the person. If such person is not the

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producing party's current employee, such person must agree to be bound by the terms of this Order.

ix. Disclosure may be made to any other person as the parties may agree to in writing or as the Court may order.

e) Except as provided in subparagraph 3(d) above, counsel for the parties shall keep all Discovery Material, including, without limitation, documents designated as Confidential Information under this Order, secure within their exclusive possession and shall take reasonable efforts to place such documents in a secure area.

f) Discovery Material, including, without limitation, Confidential Information under this Order, shall not be copied or otherwise reproduced except to the extent such copying or reproduction is reasonably necessary for permitted uses in this Action. The protections conferred by this Order cover not only Discovery Material, including, without limitation, Confidential Information, but also any information copied or extracted there from, as well as all copies, excerpts, summaries, or compilations thereof (hereinafter referred to collectively as "copies"), plus testimony, conversations, or presentations by parties or counsel to or in court or in other settings that might reveal Discovery Material, including, without limitation, Confidential Information. However, reports of statistical experts that rely upon data that has been designated as Confidential Information, but that do not reveal an individual party's data, are not deemed to contain Confidential Information if aggregated with two or more other parties' data. All copies of documents or information designated as Confidential under this Order or any portion thereof, shall be immediately affixed with the notation "CONFIDENTIAL – 1:10-cv-00318-RDB" if that notation does not already appear.

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4. Confidential Information Filed with Court.

a) To the extent that any Confidential Information (or any pleading, motion or memorandum disclosing Confidential Information) are proposed to be filed or are filed with the Court, those materials and papers, or any portion thereof which discloses Confidential Information, shall be filed under seal (by the filing party) with the Clerk of the Court in an envelope marked "SEALED PURSUANT TO ORDER OF COURT DATED _____," together with a simultaneous motion pursuant to L.R. 105.11 (hereinafter the "Interim Sealing Motion"). If the Confidential Information was that of someone other than that filing party, the filing party shall serve copies of the Interim Sealing Motion on that designating party, and within seven (7) days thereafter, the designating party may either withdraw the designation of confidentiality or file a L.R. 105.11 motion with the Court. If the designating party does not file its L.R. 105.11 motion, the document or proposed filing will be made part of the public record. The filing party shall have seven (7) days to respond to a L.R. 105.11 motion filed by the designating party.

b) The obligation to file an Interim Sealing Motion shall be wholly without prejudice to the filing party's rights under Paragraph 6 of this Protective Order.

5. Party Seeking Greater Protection Must Obtain Further Order. No information may be withheld from discovery on the ground that the material to be disclosed requires protection greater than that afforded by this Order unless the party claiming a need for greater protection moves for an order providing such special protection pursuant to Fed. R. Civ. P. 26(c).

6. Challenging Designation of Confidentiality. Should a party wish to challenge a designation of Discovery Material as Confidential Information, the following procedure shall apply:

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a) Designation Challenges. The challenging party shall identify in writing and with specificity (i.e., by document control numbers, deposition transcript page and line reference, or other means sufficient to easily locate such materials) the Discovery Material for which it seeks to challenge the Confidential Information designation. A designation challenge will trigger an obligation on the part of the producing party to make a good faith determination of whether the designation is justified. Except in the case of a designation challenge for more than 20 documents or more than 25 pages of deposition testimony, within ten (10) days the producing party shall respond in writing to the designation challenge either agreeing to de-designate the Discovery Material at issue or provide the challenging party an explanation for the designation. If a designation challenge entails more than 20 documents or more than 25 pages of deposition testimony, the challenging party and the producing party shall meet and confer, in good faith, to establish a reasonable timeframe for designation and response.

b) Court Determination. If the challenging party disagrees with a producing party's designation of material as Confidential Information, following a designation challenge, it may move the Court for relief from the Protective Order as to the contested designation(s).

c) As required by Local Rule 104.13, the producing party bears the burden to demonstrate that the designation(s) are justified under Fed. R. Civ. P. 26(c). No presumption or weight will attach to the initial designation of Discovery Material as Confidential Information.

d) Pending a ruling, the Discovery Material shall continue to be treated as Confidential Information under the terms of this Protective Order.

e) With respect to Discovery Material the parties agree does not constitute Confidential Information, or which the Court orders not to be treated as Confidential

Information, within ten (10) days of such agreement or order, the producing party shall produce a new version with the confidentiality notation redacted.

f) Nothing in this Protective Order shall be deemed to prevent a producing party from arguing during the determination process for limits on the use or manner of dissemination of Discovery Material that is found to no longer constitute Confidential Information.

7. Third Party Discovery. To the extent that any party seeks discovery from a person or entity who is not a party to this Action, and in the event such third party or any of the parties hereto contend the Discovery Material sought from the third party by a requesting party involves Confidential Information, then such third party will agree to be bound by this Order and to produce documents in compliance with this Order, and to so notify all parties to this litigation in writing. In the event such third party agrees to be bound by this Order, then the provisions of this Order are to apply to that third party.

8. Trial Materials. Nothing contained herein shall prevent any party from using Confidential Information for a trial in this Action. The Parties agree to meet and confer prior to the filing of final exhibit lists to evaluate which of the proposed exhibits require confidential treatment for purposes of trial, if any. The confidentiality notation may be redacted by the producing party prior to trial for any use of the material at trial by any party. The parties further agree to meet and confer with any third party whose documents will or may be used at trial concerning their appropriate treatment and to afford such third parties sufficient advance notice of any such use such that they can move to have the materials received under seal. Should any material furnished by a third party and received under seal be the subject of a motion to unseal, the parties shall give sufficient notice to the third party so that it may oppose the motion.

9. Return of Discovery Material at Conclusion of Litigation. Within one hundred twenty (120) days of the conclusion of the Action, all material designated as Confidential Information under this Order and not received in evidence shall be returned to the originating party. If the parties so stipulate, the material may be destroyed instead of being returned. The Clerk of the Court may return to counsel for the parties, or destroy, any sealed Confidential Information at the end of the litigation, including any appeals. Pursuant to Local Rule 113.3, within thirty (30) days of the final termination of the Action, counsel may request the return of any sealed materials other than trial and hearing exhibits or request that the materials be unsealed. If counsel fails to request the return or unsealing of any sealed Confidential Information, the Court may direct the return, destruction, or other disposition of the materials. Notwithstanding this provision, counsel are entitled to retain an archival copy of all pleadings, motion papers, transcripts, legal memoranda, correspondence, or attorney work product, even if such materials contain Confidential Information. Any such archival copies that contain or constitute Discovery Material, including, without limitation, Confidential Information, remain subject to this Order.

10. Non-waiver of Privilege for Inadvertently Disclosed Materials. The Parties acknowledge the intent and desire to avoid inadvertent production of materials protected by the attorney-client privilege, work product protection and potentially other protections recognized under state, federal or international law (hereinafter "Protected Information"). Pursuant to Fed. R. Evid. 502(d), the inadvertent disclosure of any material that qualifies as Protected Information not waive the protection or the privilege for either that material or for the subject matter of that material.

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11. Return of Inadvertently Disclosed Protected Information. Any Protected Information that the producing party deems to have been inadvertently disclosed shall be, upon written request, returned to the producing party within five (5) days, or destroyed, at that party's option. If the producing party demands that the inadvertently disclosed Protected Information also be destroyed from the original media in which it was produced, the producing party will provide duplicate media not containing the inadvertently disclosed Protected Information and a revised privilege log within seven (7) days of return or notice of destruction. If the claim that the material qualifies as Protected Information is disputed, the party disputing the assertion may maintain a single copy of the materials pending a judicial determination of the matter pursuant to Fed. R. Civ. P. 26(b)(5)(B) and Fed. R. Evid. 502.

12. Requests for Discovery Material, including, without limitation, Confidential Information, by Other Entities. If another court, any U.S., state or foreign governmental agency, or any other non-party should request, subpoena, or order the production of Discovery Material, including, without limitation, Confidential Information, that has been produced by any party or third party and is subject to this Order, the party receiving such a request shall promptly notify the producing party. Should the producing party object to the release of Confidential Information, it may seek appropriate relief from the appropriate court or agency, and pending such a request, if necessary, seek the entry of an appropriate stay order, and the party receiving the request shall not disclose the material in dispute so long as it may lawfully refuse.

14. Remedies for Non-Compliance. The parties agree that any disclosure of Confidential Information contrary to the terms of this Order by a party or anyone acting on its, his or her behalf constitutes a violation of the Order remediable by this Court, regardless of where the Disclosure occurs.

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15. Application to Subsequent Parties. Any subsequent party to the litigation will be bound by this Order.

Dated: September 21, 2011

GOLD BENNETT CERA & SIDENER LLP

/s/ Solomon B. Cera
Solomon B. Cera - (admitted *pro hac vice*)
(Signed by Robert B. Levin with
permission of Solomon B. Cera)
scera@gbcslaw.com
C. Andrew Dirksen - (admitted *pro hac vice*)
(Signed by Robert B. Levin with
permission of C. Andrew Dirksen)
adirksen@gbcslaw.com
595 Market Street, Suite 2300
San Francisco, California 94105
Telephone: (415) 777-2230
Facsimile: (415) 777-5189

Dated: September 21, 2011

SHAPIRO SHER GUINOT & SANDLER

/s/ Paul Mark Sandler
Paul Mark Sandler
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rbl@shapirosher.com
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Baltimore, Maryland 21201
Telephone: (410) 385-0202
Facsimile: (410) 539-7611

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Dated: September 21, 2011

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

/s/ Joseph R. Saveri

Joseph R. Saveri - (admitted *pro hac vice*)
jsaveri@lchb.com

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IT IS SO ORDERED.



Richard D. Bennett

United States District Judge

SEPTEMBER 21, 2011

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CERTIFICATE OF SERVICE

I hereby certify that, on the 21st day of September, 2011, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. The Court or the CM/ECF system will send notification of such filings to all CM/ECF participants. I further certify that a true and correct copy of this document was sent via U.S. first-class mail, postage paid, to all non-CM/ECF participants.

/s/ Robert B. Levin

Robert B. Levin

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EXHIBIT A

CERTIFICATION AND CONFIDENTIALITY AGREEMENT

I, _____, certify and declare under penalty of perjury that I have read in its entirety and understand the Stipulated Protective Order that was issued by the United States District Court of Maryland (Northern Division) on _____ in the case of *In re Titanium Dioxide Antitrust Litigation*, Master Docket No. 10-CV-00318 (RDB). I agree to comply with and to be bound by all the terms of this Stipulated Protective Order and I understand and acknowledge that failure to so comply could expose me to sanctions and punishment in the nature of contempt. I solemnly promise that I will not disclose in any manner any information or item that is subject to this Stipulated Protective Order to any person or entity except in strict compliance with the provisions of this Order.

I further agree to submit to the jurisdiction of the United States District Court of Maryland for the purpose of enforcing the terms of this Stipulated Protective Order, even if such enforcement proceedings occur after termination of this action.

I acknowledge that I am to retain all copies of any of the materials that I receive that have been designated as "CONFIDENTIAL" in a manner consistent with this Order, and that all such copies are to be returned or destroyed as specified in this Order on the termination of this litigation or the completion of my duties in connection with this litigation.

Date

City and State where sworn and signed

Signature

Printed Name

Address

Phone Number

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EXHIBIT 4

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**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

In the Matter of

**Tronox Limited
a corporation,**

**National Industrialization Company
(TASNEE)
a corporation,**

Docket No. 9377

**The National Titanium Dioxide
Company Limited (Cristal)
a corporation,**

And

**Cristal USA Inc.
a corporation.**

MATERIAL SUBJECT TO THE PROTECTIVE ORDER

As set forth in 16 C.F.R. § 3.45(e), National Industrialization Company, the National Titanium Dioxide Company Limited, and Cristal USA Inc. hereby attach a copy of each page of their Motion for In Camera Treatment of Proposed Trial Exhibits and associated exhibits and attachments that contains material they request confidential treatment for pursuant to the December 7, 2017 Protective Order Governing Confidential Material entered in the above-captioned case. The following persons should be notified of the Commission's intent to disclose in a final decision any of the confidential information in the Motion for In Camera Treatment of Proposed Trial Exhibits and associated exhibits and attachments:

James L. Cooper
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**ATTORNEYS FOR NATIONAL INDUSTRIALIZATION COMPANY (TASNEE),
THE NATIONAL TITANIUM DIOXIDE COMPANY LIMITED (CRISTAL), AND
CRISTAL USA INC.**

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21. As such, while the documents themselves may be more than three years old, the information contained in those documents remains competitively sensitive, and disclosure of that information will harm Cristal as much and in the same way as disclosure of more recent documents.

B. Category 2: Customer-Specific Pricing Information

22. Cristal's pricing for TiO₂ products is customer-specific and not generally known outside the particular customer relationship. Cristal negotiates prices for each product on a customer-by-customer basis at arm's length based on a multitude of factors regarding [REDACTED]

23. Documents in this category contain the specific pricing and, in some cases, contract terms negotiated with particular customers, including [REDACTED]

24. The type of information contained in this category of documents is treated as highly confidential and proprietary within Cristal. The information is disseminated on a need-to-know basis within Cristal. This granular information is not disclosed outside of the company and its owners other than under an NDA for specific limited circumstances and, in particular, is not disclosed to Cristal's competitors.

25. Cristal would be significantly disadvantaged during negotiations with customers if this information became public. Through the documents in this category, customers would be able to access Cristal's pricing to other customers for products they purchase from Cristal, in essence crippling Cristal in what are typically arm's length negotiations with customers regarding price and volume.

26. Competitors could exploit this information in negotiations with Cristal's customers, and could use it to identify and target areas where such information would permit the competitor to gain a competitive advantage over Cristal and focus resources on those areas.

27. Similarly, competitors could use such information to inform their own production decisions in ways that would be harmful to Cristal.

28. Cristal safeguards its customer information in order to avoid this type of competitive injury, and public disclosure of these secret data would render meaningless Cristal's efforts to limit distribution of this sensitive information.

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29. Only one document falling exclusively into this category is older than three years old:

PX2011. [REDACTED]
[REDACTED]
[REDACTED]

30. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

31. [REDACTED]

[REDACTED]
[REDACTED]

32. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

33. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

34. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

C. Category 3: Product-Level Pricing Information

35. Documents in this category contain details of prices or price changes charged or planned by Cristal for TiO₂ products generally or for specific grades of TiO₂ or other Cristal products.

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36. The type of information contained in this category of documents is treated as highly confidential and proprietary within Cristal. The information is disseminated on a need-to-know basis within Cristal. This granular information is not disclosed outside of the company and its owners other than under an NDA for specific limited circumstances and, in particular, is not disclosed to Cristal's competitors.

37. If this information were to become public, Cristal would be significantly disadvantaged during negotiations with customers. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

38. Competitors could also use this information to undermine Cristal's competitiveness by utilizing Cristal's proprietary information to exploit its perceived weaknesses or adopt its successful strategies.

39. Because of the long-term customer relationships Cristal has built and the length of the TiO₂ business cycle, Cristal would continue to be harmed by release of this information over the next five years.

D. Category 4: Cost Information

40. Documents in this category include specific information about Cristal's costs, such as overhead and input cost information for Cristal's business and production facilities.

41. The type of information contained in this category of documents is treated as highly confidential and proprietary within Cristal. The information is disseminated on a need-to-know basis within Cristal. This granular information is not disclosed outside of the company and its owners other than under an NDA for specific limited circumstances and, in particular, is not disclosed to Cristal's competitors.

42. Customers receiving this information could use Cristal's costs to gain an advantage in negotiations, to Cristal's detriment.

43. Competitors could exploit this information in negotiations with Cristal's customers and could use it to identify and target areas where such information would permit the competitor to gain a competitive advantage over Cristal and focus resources on those areas.

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44. Similarly, competitors could use such information to inform their own production decisions in ways that would be harmful to Cristal.

45. Cristal safeguards its cost data in order to avoid this type of competitive injury, and public disclosure of these secret data would render meaningless Cristal's efforts to limit distribution of this sensitive information.

46. Disclosure of the cost information in these documents would be harmful to Cristal for at least 5 years, because [REDACTED]

II. Strategic and Future Plans

47. Certain of the documents listed for potential use at the public hearing contain internal Cristal strategic plans and confidential analyses of Cristal's business operations. Public disclosure of such information threatens to compromise Cristal's competitive position by revealing confidential information to competitors and companies with whom Cristal has business dealings.

A. *Category 5: Business Plans and Competitive Strategy*

48. Documents in category 5 concern Cristal's internal company presentations and communications that reflect Cristal's confidential business plans and strategies. Some of these documents discuss confidential Cristal business opportunities, strategic goals, competitive initiatives going forward, operating plans, competitive strategy, and strengths and weaknesses with respect to pricing and margins, including discussions of Cristal's industry outlook and future goals and initiatives.

49. These documents reveal highly confidential information concerning (i) Cristal's customer and distributor contracts, negotiations, and communications, (ii) Cristal's strategies in the TiO₂ marketplace, (iii) the strategic decision making of Cristal and TASNEE executives, and (iv) Cristal's strategic analyses of the TiO₂ and TiO₂ feedstock industries, including Cristal's current competitive positioning in the marketplace and recommendations on Cristal's future competitive posture.

50. Cristal does not broadly disseminate these types of strategy documents, even within Cristal. Rather, these strategies are restricted to a limited group of management and executive personnel charged with devising and implementing Cristal's strategic direction and competitive goals.

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51. Disclosure of these documents would reveal detailed confidential information about Cristal's business operations, sales performance, customer base, production facilities, and customer service capabilities.

52. Release of such information to competitors would limit Cristal's ability to execute its business plans and allow its competitors to undermine Cristal's broader strategy as well as diminish Cristal's ability to market its products, effectively utilize its plants, and maintain its customer relationships.

53. Competitors could use this information to gain insight into the workings and directional strategy of Cristal's business, allowing them to undermine the competitiveness of Cristal's business by exploiting areas of weakness and tailoring their own strategies to hurt Cristal's business. Cristal would not have access to similar information of its competitors and would therefore be at a strategic disadvantage.

54. Competitors could also use Cristal's strategies, [REDACTED], in their own business planning. Competitors would get the benefit of Cristal's strongest competitive and operational initiatives without having to invest the resources that Cristal has spent to develop these initiatives, harming Cristal's ability to effectively compete against those competitors from a cost and value perspective.

55. Current and potential suppliers or customers also could use confidential information in negotiations with Cristal to gain an unfair advantage or otherwise undermine Cristal's negotiating power.

B. Category 6: Pricing Strategy

56. Documents in this category contain information reflecting Cristal's strategy with respect to pricing for its products. These documents reveal highly sensitive, non-public information going to the core of Cristal's sales structure.

57. Cristal does not broadly disseminate these types of strategy documents, even within Cristal. Rather, these strategies are restricted to a limited group of management and executive personnel charged with devising and implementing Cristal's strategic direction and competitive goals.

58. Public disclosure of this internal pricing strategy would harm Cristal's ability to effectively negotiate with customers, who would have deep insight into Cristal's confidential strategy during negotiations that are typically conducted at arm's length.

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59. Public disclosure would also harm Cristal’s ability to compete effectively against rivals, who would seek to exploit their new-found knowledge of Cristal’s pricing strategy and appropriate its methodology without having to expend the resources Cristal has put into developing it.

60. Competitors could also use this information to gain a strategic advantage in their own negotiations with customers.

61. [REDACTED]

C. Category 7: Customer Negotiations and Internal Customer Strategy

62. Documents in this category contain information reflecting contract and sales negotiations with specific customers and Cristal’s internal strategy with respect to those negotiations.

63. Customer relationship management is a critical part of Cristal’s business. Public disclosure of these confidential customer and internal communications would harm Cristal by damaging established customer relationships, giving customers a strategic advantage in negotiations.

64. As discussed in paragraph 12, Cristal limits distribution of this information even within Cristal to employees who need the information in order to perform their job responsibilities.

65. Disclosure would also provide competitors with a roadmap of Cristal’s pricing and sales process and an unfair insight into how Cristal competes for the business of specific customers.

66. If customers and competitors had the insight into Cristal’s negotiating strategy that can be gleaned from these documents, Cristal’s position in future negotiations would be irreparably damaged. Competitors whose internal strategies had not been publicly disclosed would be able to exploit those insights in negotiations with Cristal customers and in formulating their own approach to customer negotiations.

67. [REDACTED]

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68. [REDACTED]

69. [REDACTED]

70. The damage caused by public disclosure of these documents would also be caused by release of information that is more than three years old, as three years is a relatively short period of time given the length of many of Cristal's customer relationships and the length of the TiO2 business cycle.

71. [REDACTED]

D. Category 8: Production and Product Allocation Decisions

72. Documents in this category contain information about decisions and strategies relating to Cristal's various production facilities that produce TiO2 and other products, as well as Cristal's mining and smelting (slagging) operations, including decisions about where and to which customers to allocate products manufactured at those facilities.

73. These documents reveal highly confidential information concerning (i) Cristal's customer and distributor contracts, negotiations, and communications, (ii) Cristal's strategies in the TiO2 marketplace, (iii) the strategic decision making of Cristal executives, and (iv) Cristal's strategic analyses of the TiO2 and TiO2 feedstock industries, including Cristal's current competitive positioning in the marketplace and recommendations on Cristal's future competitive posture.

74. Cristal does not broadly disseminate these types of documents, even within Cristal. Rather, these strategies are restricted to a limited group of personnel charged with devising and implementing Cristal's production and product allocation strategies.

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75. Release of such documents would significantly lessen Cristal’s abilities to compete in the marketplace in the following ways:

76. Competitors would be able to ascertain both Cristal’s overall business plan and strategies and detailed proprietary information about its products, plants, and customer negotiations and relationships. Making this sensitive information available to the public would limit Cristal’s ability to execute its business plans and allow its competitors to unfairly exploit any weaknesses in Cristal’s broader strategy as well as its products, plants, and customer relationships.

77. [REDACTED]

78. [REDACTED]

79. [REDACTED]

80. Some of these documents contain detailed sales, operations, and cost information for Cristal’s various facilities and products in various regions. Each of these categories of information could be used by competitors to gain insight into Cristal’s business to undermine the competitiveness of each of Cristal’s facilities.

81. In addition, this information could be used by Cristal’s suppliers to gain an advantage in negotiations for Cristal’s purchases of inputs into its manufacturing processes.

82. The types of information described above are treated as highly confidential and proprietary within Cristal and by its owners. The information is disseminated on a need-to-know basis.

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This information is not disclosed to others outside of the company and, in particular, is not disclosed to Cristal's competitors or suppliers.

83. While some of the details referenced in particular documents may change with time, the core information and strategic considerations contained in these documents regarding Cristal's production planning tactics, customer demands and preferences, approach to customer negotiations, strategic supply planning, and strategy with respect to the TiO₂ industry as a whole have remained generally consistent over the past several years and will remain highly competitively relevant for the foreseeable future.

III. Technical Information and Other Trade Secrets

A. *Category 9: Proprietary Technical Information*

84. The documents in the proprietary technical information category consist of information regarding the technical specifications, capabilities, and proprietary processes relating to Cristal's manufacturing plants and products.

85. Cristal does not broadly disseminate these types of documents or technical information, even within Cristal.

86. With regard to Cristal's manufacturing plants, this information includes detailed descriptions of proprietary systems and processes, plans to improve upon said systems and processes, manufacturing capacity and capabilities for specific plants, and cost information. Most of the documents in this category provide detailed information relating to Cristal's manufacturing facility in Yanbu and Cristal's ilmenite slagging facility in Jazan, Saudi Arabia ("Jazan Slagger").

87. [REDACTED]

88. With regard to Cristal's products, this information includes testing and benchmarking results, internal analysis of product quality and specifications, product development and improvement plans, and technical support capabilities provided to customers.

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89. Release of such documents would significantly lessen Cristal’s abilities to compete in the marketplace. Cristal would lose competitive advantages it has developed and is working to develop with regard to its manufacturing processes and systems as well as product development and improvement.

90. Competitors will be able to unfairly appropriate Cristal’s innovations and proprietary information. Competitors would be able to ascertain any weaknesses within Cristal’s manufacturing systems and processes as well as in Cristal’s products and unfairly exploit that confidential information to significantly lessen Cristal’s competitiveness in the marketplace.

91. Cristal devotes significant resources to developing and refining its technical expertise and keeping the details of that expertise confidential. These details are trade secrets, and public disclosure of these trade secrets would diminish their value.

92. The details of the facilities and processes discussed in these documents do not change significantly over time, so it is important that Cristal be able to maintain the confidentiality of this information for the foreseeable future, for at least the next 10-15 years, including for documents that are more than three years old.

B. Category 10: Pricing Formulas/Models

93. Documents in this category include pricing models and formulas that Cristal uses to inform its pricing decisions.

94. Cristal does not broadly disseminate this type of information, even within Cristal. Rather, these strategies are restricted to a limited group of personnel charged with devising and implementing Cristal’s pricing strategy and consultants Cristal has retained to help develop such strategies.

95. [REDACTED]

96. By its very nature, a pricing formula or pricing model remains competitively sensitive so long as it is still in use. The documents in this category reveal pricing formulas and models that Cristal still uses to inform its pricing decisions. As described above in paragraphs 25-34, 37-38, and 58-60,

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information about Cristal's pricing could be used by competitors and customers in ways that would harm Cristal's business.

97. [REDACTED]

98. In order to maintain the secrecy of its pricing strategy, if these documents were disclosed to the public, Cristal would have to abandon or significantly alter the methodology it has developed through substantial investment of time and resources.

99. [REDACTED]

IV. Category 11: Sensitive Compensation and Benefits Information

100. Five documents on Complaint Counsel's proposed exhibit list contain sensitive information about the compensation and benefits packages offered to specific individuals, and Cristal's plans relating to future potential changes in its work force and compensation/benefits strategy for specific Cristal facilities (see PX2322).

101. Three of the five documents, PX2349, PX2438, and PX2184, fall exclusively into this category of confidential information. Compensation is sensitive personal information not known to other employees, and its disclosure would be harmful to those individuals. This compensation information is also important confidential business information of Cristal. Cristal competes for a limited pool of talented employees with experience suited to the TiO₂ industry primarily through compensation and benefits packages.

102. Other TiO₂ suppliers compete with Cristal to recruit qualified individuals, and those competitors could use knowledge of the compensation and benefits packages offered by Cristal in their recruitment and hiring negotiations to harm Cristal's ability to retain key personnel.

103. Disclosure of the compensation packages of certain employees and offerees, particularly for high-level and technical positions for which there is not necessarily a "market" rate, would also harm Cristal by giving prospective and current employees an advantage over Cristal in compensation negotiations.

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX0001; RX0719	3/2/2017		PX0001-001	PX0001-059	Customer-Specific Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX0002	9/6/2017		PX0002-001	PX0002-114	Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX0005; RX0730	8/15/2017		PX0005-001	PX0005-035	Pricing Strategy; Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX0012	9/25/2017		PX0012-001	PX0012-008	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX0013; RX0737	9/1/2017		PX0013-001	PX0013-006	Customer-Specific Pricing Information		5 years
PX0015	9/1/2017		PX0015-001	PX0015-003	Proprietary Technical Information		10 years
PX0016; RX0202; RX0637	10/17/2017		PX0016-001	PX0016-140	Customer-Specific Pricing Information; Pricing Strategy; Confidential Financial Information and Forecasts; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX0019	4/13/2017		PX0019-001	PX0019-115	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX0020; RX1173	2/5/2018		PX0020-001	PX0020-037	Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX0024	3/2/2018		PX0024-001	PX0024-028	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2000	12/15/2015		CR2R-000658314	CR2R-000658360	Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX2002	8/25/2016		CR2R-002371809	CR2R-002371810	Pricing Formulas/Models		Indefinite (or, in the alternative, at least 10 years)
PX2004	10/23/2012		CR2R-003204712	CR2R-003204712	Business Plans and Competitive Strategy		5 years
PX2006	10/26/2016		CR2R-000122118	CR2R-000122118	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2007	10/27/2016		CR2R-000122142	CR2R-000122144	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2008	4/28/2017		CR2R-000234433	CR2R-000234440	Pricing Formulas/Models; Customer Negotiations and Internal Customer Strategy		Indefinite (or, in the alternative, at least 10 years)

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2009	5/1/2017		CR2R-000234485	CR2R-000234487	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2011	4/5/2013		CR2R-000262988	CR2R-000262993	Customer-Specific Pricing Information		Indefinite (or, in the alternative, at least 10 years)
PX2014; RX0756	11/21/2016		CR2R-001578220	CR2R-001578448	Business Plans and Competitive Strategy; Cost Information		5 years
PX2016	4/3/2013		CR2R-001657616	CR2R-001657618	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2020	8/25/2016		CR2R-002371813	CR2R-002371814	Business Plans and Competitive Strategy		5 years
PX2021	5/25/2011		CR2R-000328563	CR2R-000328565	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2025	00/00/2017		CR2R-000781209	CR2R-000781209	Product-Level Pricing Information		5 years
PX2026	10/6/2017		CR2R-000794237	CR2R-000794237	Customer-Specific Pricing Information; Business Plans and Competitive Strategy		5 years
PX2027	9/14/2016		CR2R-001000051	CR2R-001000053	Product-Level Pricing Information; Business Plans and Competitive Strategy; Cost Information		5 years
PX2029	7/14/2013		CR2R-001763653	CR2R-001763659	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2031	11/18/2015	[REDACTED]	CR2R-001969524	CR2R-001969593	Pricing Formulas/Models; Business Plans and Competitive Strategy	[REDACTED]	Indefinite (or, in the alternative, at least 10 years)
PX2036	11/4/2011	[REDACTED]	CR2R-001813614	CR2R-001813616	Customer-Specific Pricing Information; Pricing Strategy	[REDACTED]	years
PX2038	8/29/2015	[REDACTED]	CR2R-006551755	CR2R-006551762	Production and Product Allocation Decisions; Business Plans and Competitive Strategy	[REDACTED]	0 years
PX2039	9/9/2016	[REDACTED]	CR2R-000050431	CR2R-000050435	Production and Product Allocation Decisions; Business Plans and Competitive Strategy	[REDACTED]	0 years
PX2041	8/19/2016	[REDACTED]	CR2R-000197278	CR2R-000197279	Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy	[REDACTED]	0 years
PX2042	9/23/2016	[REDACTED]	CR2R-000781208	CR2R-000781227	Product-Level Pricing Information; Production and Product Allocation Decisions; Business Plans and Competitive Strategy	[REDACTED]	0 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2046	6/10/2015		CR2R-004510283	CR2R-004510283	Product-Level Pricing Information; Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2047	4/21/2015		CR2R-004563770	CR2R-004563779	Pricing Strategy; Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2049	2/27/2016		CR2R-006265285	CR2R-006265291	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
PX2050	5/13/2015		CR2R-006872262	CR2R-006872268	Product-Level Pricing Information; Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2054	2/7/2013		CR2R-001377453	CR2R-001377453	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2055	2/26/2016		CR2R-002922147	CR2R-002922147	Business Plans and Competitive Strategy		5 years
PX2059	11/14/2016		CRI_SR0000001371	CRI_SR0000001384	Business Plans and Competitive Strategy		5 years
PX2060	8/15/2016		CRI_SR0000001396	CRI_SR0000001409	Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2061	3/16/2017		CRI_SR0000001343	CRI_SR0000001359	Business Plans and Competitive Strategy		5 years
PX2062	5/12/2017		CRI_SR0000001313	CRI_SR0000001328	Business Plans and Competitive Strategy		5 years
PX2065	9/9/2013		CR2R-000296975	CR2R-000296976	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2068	7/17/2015		CR2R-000532792	CR2R-000532793	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2069	8/30/2016		CR2R-002533239	CR2R-002533242	Customer-Specific Pricing Information		5 years
PX2070	2/28/2012		CR2R-000317646	CR2R-000317650	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2077	11/24/2015		CR2R-001420053	CR2R-001420057	Pricing Strategy		5 years
PX2088	6/17/2014		CR2R-000288754	CR2R-000288764	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2089	9/1/2016		CR2R-000774681	CR2R-000774682	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2090	1/16/2017	[REDACTED]	CR2R-000970591	CR2R-000970593	Pricing Strategy	[REDACTED]	5 years
PX2091	3/30/2017	[REDACTED]	CR2R-001008001	CR2R-001008002	Product-Level Pricing Information; Pricing Strategy	[REDACTED]	5 years
PX2092	4/1/2017	[REDACTED]	CR2R-001018601	CR2R-001018602	Customer-Specific Pricing Information	[REDACTED]	5 years
PX2094	4/28/2017	[REDACTED]	CR2R-001018999	CR2R-001019002	Pricing Strategy	[REDACTED]	5 years
PX2098	1/3/2017	[REDACTED]	CR2R-001181633	CR2R-001181634	Pricing Strategy	[REDACTED]	5 years
PX2100	5/9/2017	[REDACTED]	CR2R-001189188	CR2R-001189188	Pricing Strategy	[REDACTED]	5 years
PX2102	5/4/2017	[REDACTED]	CR2R-001189225	CR2R-001189230	Pricing Formulas/Models; Customer-Specific Pricing Information	[REDACTED]	Indefinite (or, in the alternative, at least 10 years)
PX2105	1/4/2017	[REDACTED]	CR2R-001373501	CR2R-001373502	Customer-Specific Pricing Information	[REDACTED]	5 years
PX2106	1/17/2017	[REDACTED]	CR2R-001544428	CR2R-001544429	Pricing Strategy; Business Plans and Competitive Strategy	[REDACTED]	5 years
PX2108	4/21/2016	[REDACTED]	CR2R-002278775	CR2R-002278776	Pricing Strategy	[REDACTED]	5 years
PX2109	1/3/2017	[REDACTED]	CR2R-002911103	CR2R-002911107	Customer-Specific Pricing Information	[REDACTED]	5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2110; RX0689	3/29/2017		CR2R-003151848	CR2R-003151850	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2112	6/8/2016		CR2R-003481215	CR2R-003481216	Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions		10 years
PX2113	1/20/2017		CR2R-005822092	CR2R-005822093	Pricing Strategy		5 years
PX2116; RX0734	8/23/2016		CR2R-005255428	CR2R-005255623	Customer-Specific Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2122	3/5/2017		CR2R-000561137	CR2R-000561141	Production and Product Allocation Decisions		10 years
PX2123	11/22/2016		CR2R-005247497	CR2R-005247517	Business Plans and Competitive Strategy		5 years
PX2124	3/20/2017		CR2R-000563218	CR2R-000563248	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2125	5/28/2017		CR2R-000563611	CR2R-000563616	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2128	5/13/2017		CR2R-005147640	CR2R-005147647	Confidential Financial Information and Forecasts		5 years
PX2129	3/14/2017		CR2R-005148588	CR2R-005148647	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2130	2/21/2017		CR2R-005149194	CR2R-005149222	Confidential Financial Information and Forecasts		5 years
PX2132	11/15/2016		CR2R-005163647	CR2R-005163647	Production and Product Allocation Decisions; Cost Information		10 years
PX2133	12/4/2015		CR2R-005205268	CR2R-005205314	Product-Level Pricing Information; Production and Product Allocation Decisions; Cost Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2134	9/29/2016		CR2R-005211310	CR2R-005211368	Pricing Formulas/Models; Product-Level Pricing Information; Pricing Strategy; Confidential Financial Information and Forecasts		Indefinite (or, in the alternative, at least 10 years)
PX2135	9/5/2016		CR2R-005253585	CR2R-005253632	Business Plans and Competitive Strategy		5 years
PX2138	6/3/2016		CR2R-007411307	CR2R-007411310	Business Plans and Competitive Strategy		5 years
PX2140; RX0733	12/3/2015		CR2R-008614857	CR2R-008614863	Business Plans and Competitive Strategy		5 years
PX2142	3/20/2017		CR2R-000563200	CR2R-000563217	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2143	12/6/2016		CR2R-007175926	CR2R-007175926	Product-Level Pricing Information; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2144	4/17/2016		CR2R-007183144	CR2R-007183285	Customer-Specific Pricing Information; Product-Level Pricing Information; Production and Product Allocation Decisions; Cost Information		10 years
PX2147	1/12/2017		CR2R-010331606	CR2R-010331612	Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2149; RX0729	8/9/2016		CR2R-000592957	CR2R-000592960	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2151	5/30/2017		CR2R-005175900	CR2R-005175910	Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2152	1/9/2016		CR2R-000192126	CR2R-000192128	Pricing Formulas/Models; Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		Indefinite (or, in the alternative, at least 10 years)
PX2153	2/4/2016		CR2R-000192572	CR2R-000192574	Pricing Formulas/Models; Customer-Specific Pricing Information; Product-Level Pricing Information		Indefinite (or, in the alternative, at least 10 years)
PX2154	1/19/2016		CR2R-000207603	CR2R-000207603	Pricing Formulas/Models; Customer-Specific Pricing Information; Product-Level Pricing Information		Indefinite (or, in the alternative, at least 10 years)
PX2155	1/14/2017		CR2R-008211226	CR2R-008211227	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2156	5/2/2015		CR2R-000594089	CR2R-000594092	Business Plans and Competitive Strategy		5 years
PX2157	6/22/2015		CR2R-001577890	CR2R-001577892	Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2158	12/4/2015		CR2R-001735513	CR2R-001735517	Cost Information; Business Plans and Competitive Strategy		5 years
PX2162	7/15/2016		CR2R-003737613	CR2R-003737614	Business Plans and Competitive Strategy		5 years
PX2163	3/30/2016		CR2R-011855153	CR2R-011855158	Confidential Financial Information and Forecasts		
PX2164; RX0741	12/16/2016		CR2R-003738762	CR2R-003738819	Proprietary Technical Information		10 years
PX2165	5/26/2017		CR2R-002850635	CR2R-002850637	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information		10 years
PX2167	5/9/2016		CR2R-001671028	CR2R-001671029	Business Plans and Competitive Strategy		5 years
PX2171; RX0732	3/9/2017		CR2R-005171303	CR2R-005171308	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2172	8/1/2016		CR2R-000115074	CR2R-000115078	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2173	5/24/2017		CR2R-002432708	CR2R-002432708	Cost Information; Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2174	9/14/2017		CR2R-002461395	CR2R-002461398	Production and Product Allocation Decisions; Cost Information		10 years
PX2175	3/30/2017		CR2R-002836565	CR2R-002836576	Cost Information; Proprietary Technical Information		10 years
PX2177	12/22/2016		CR2R-006539196	CR2R-006539247	Production and Product Allocation Decisions; Cost Information		10 years
PX2178	9/19/2016		CR2R-006532779	CR2R-006532922	Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2179	04/00/2017		CRI_SR0000001434	CRI_SR0000001441	Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX2180	2/8/2017		CR2R-000569711	CR2R-000569739	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2181	6/9/2017		CR2R-000573780	CR2R-000573781	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2183	9/2/2016		CR2R-000595459	CR2R-000595464	Proprietary Technical Information		10 years
PX2184	5/24/2017		CR2R-000596605	CR2R-000596608	Sensitive Compensation and Benefits Information		5 years
PX2187	6/21/2017		CR2R-008126684	CR2R-008126688	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2189	7/26/2017		CR2R-008620788	CR2R-008620789	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2190	6/7/2017		CR2R-011461067	CR2R-011461074	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2193	6/29/2017		CR2R-008392125	CR2R-008392128	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2196;RX0740	9/20/2016		CR2R-002744491	CR2R-002744491	Business Plans and Competitive Strategy		5 years
PX2197	3/31/2017		CR2R-000007813	CR2R-000007822	Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2198	1/12/2017		CR2R-004888849	CR2R-004888867	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2200	9/17/2016		CR2R-004178105	CR2R-004178105	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2201	8/9/2016		CR2R-000668105	CR2R-000668108	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2202;RX0738	8/1/2016		CR2R-000560884	CR2R-000560885	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2204	10/5/2016		CR2R-004505035	CR2R-004505035	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2205; RX0744	2/7/2017		CR2R-007325557	CR2R-007325559	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2206; RX0742	1/11/2017		CR2R-004336503	CR2R-004336527	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2207	4/17/2017		CR2R-005147658	CR2R-005147717	Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX2208; RX0610	12/00/2016		CR2R-005986934	CR2R-005987017	Cost Information; Proprietary Technical Information		10 years
PX2209	12/3/2015		CR2R-004694271	CR2R-004694273	Business Plans and Competitive Strategy		5 years
PX2210	9/29/2015		CR2R-005414290	CR2R-005414374	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2211	5/10/2017		CR2R-002414676	CR2R-002414677	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2217	12/00/2016		CRI_SR0000001585	CRI_SR0000001590	Production and Product Allocation Decisions; Cost Information		10 years
PX2218	12/22/2014		CR2R-001073808	CR2R-001073810	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2219	9/15/2016		CR2R-000774485	CR2R-000774489	Cost Information; Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2220	9/7/2016		CR2R-000197723	CR2R-000197745	Customer-Specific Pricing Information; Product-Level Pricing Information		5 years
PX2221	9/11/2015		CR2R-000538940	CR2R-000538941	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2227	9/18/2015		CR2R-001031518	CR2R-001031521	Business Plans and Competitive Strategy		5 years
PX2228	7/13/2012		CR2R-001682188	CR2R-001682190	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
PX2234	9/19/2016		CR2R-006532750	CR2R-006532778	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2236	2/4/2017		CR2R-001958750	CR2R-001958754	Proprietary Technical Information		10 years
PX2239	12/7/2016		CR2R-000201290	CR2R-000201343	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2245	7/13/2012		CR2R-004040998	CR2R-004041137	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2246	8/19/2015		CR2R7G-000005474	CR2R7G-000005680	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX2247	2/18/2015		CR2R7G-000022383	CR2R7G-000022661	Product-Level Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX2248	8/3/2012		CR2R7G-000030929	CR2R7G-000030990	Litigation Protective Order		In Accordance with Protective Order
PX2249	10/18/2012		CR2R7G-000045905	CR2R7G-000045970	Litigation Protective Order		In Accordance with Protective Order
PX2250	7/17/2012		CR2R7G-000067725	CR2R7G-000067780	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX2251	7/24/2012		CR2R7G-000074522	CR2R7G-000074576	Customer-Specific Pricing Information; Pricing Strategy; Litigation Protective Order		5 years
PX2252	5/22/2012		CR2R7G-000087834	CR2R7G-000087887	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX2253	5/24/2012		CR2R7G-000089817	CR2R7G-000089889	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX2254	6/15/2012		CR2R7G-000095711	CR2R7G-000095811	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX2257; RX1020	8/19/2015		CR2R7G-000006075	CR2R7G-000006219	Customer-Specific Pricing Information; Litigation Protective Order		5 years
PX2258	3/13/2013		CR2R-001928983	CR2R-001928986	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2259	6/9/2016		CR2R-000110711	CR2R-000110713	Cost Information; Proprietary Technical Information		10 years
PX2262	1/30/2014		CR2R-000292951	CR2R-000292956	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2270	9/2/2014		CR2R-002663153	CR2R-002663155	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2271	5/18/2016		CR2R-003728694	CR2R-003728705	Business Plans and Competitive Strategy		5 years
PX2274	5/15/2015		CR2R-008089004	CR2R-008089005	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2275	9/29/2016		CR2R-000966866	CR2R-000966867	Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy		10 years
PX2281	9/20/2016		CR2R-000609042	CR2R-000609056	Confidential Financial Information and Forecasts; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2282	5/10/2017		CR2R-003834196	CR2R-003834275	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2283	7/28/2017		CR2R-010735598	CR2R-010735600	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2284; RX0696	12/30/2016		CR2R-004335945	CR2R-004335951	Proprietary Technical Information		10 years
PX2286	8/1/2016		CR2R-000115069	CR2R-000115073	Production and Product Allocation Decisions; Cost Information		10 years
PX2287	12/1/2015		CR2R-000797028	CR2R-000797029	Business Plans and Competitive Strategy		5 years
PX2288	4/16/2017		CR2R-002890961	CR2R-002891084	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2289	12/12/2016		CR2R-008787497	CR2R-008787734	Confidential Financial Information and Forecasts; Cost Information; Business Plans and Competitive Strategy		5 years
PX2291	5/7/2017		CR2R-003811238	CR2R-003811251	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2292	4/3/2017		CR2R-000576227	CR2R-000576234	Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2293	2/16/2017		CR2R-004366850	CR2R-004366850	Business Plans and Competitive Strategy		5 years
PX2294	6/6/2017		CR2R-004375903	CR2R-004375904	Product-Level Pricing Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2295; RX0743	2/5/2017		CR2R-004367689	CR2R-004367690	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2299	8/1/2016		CR2R-000774978	CR2R-000774981	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2300	4/1/2017		CR2R-001018603	CR2R-001018604	Customer-Specific Pricing Information		5 years
PX2301	1/13/2017		CR2R-001064585	CR2R-001064586	Customer-Specific Pricing Information		5 years
PX2303	12/9/2016		CR2R-001181439	CR2R-001181440	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2304	8/1/2016		CR2R-001309290	CR2R-001309291	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2305	7/29/2016		CR2R-001309320	CR2R-001309321	Customer-Specific Pricing Information		5 years
PX2307	8/1/2016		CR2R-005804675	CR2R-005804676	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2310	7/28/2017		CRP3-000501244	CRP3-000501247	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2311	7/27/2017		CRP3-000501252	CRP3-000501257	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2312	10/18/2017		CRP3-000519313	CRP3-000519314	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2313	10/18/2017		CRP3-000519385	CRP3-000519386	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2314	10/25/2017		CRP3-000520804	CRP3-000520808	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2315; RX0735	5/18/2017		CR2R-011267074	CR2R-011267078	Pricing Formulas/Models; Customer-Specific Pricing Information		Indefinite (or, in the alternative, at least 10 years)
PX2316; RX0736	10/31/2017		CRP3-000521998	CRP3-000522000	Customer-Specific Pricing Information; Product-Level Pricing Information		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2318	8/29/2016		CR2R-002904707	CR2R-002904710	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2322	8/31/2017		CRP3-000244969	CRP3-000244978	Cost Information; Business Plans and Competitive Strategy; Sensitive Compensation and Benefits Information		5 years
PX2328	9/28/2017		CRP3-000534558	CRP3-000534583	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
PX2329	10/4/2017		CRP3-000544158	CRP3-000544160	Cost Information		5 years
PX2330	9/13/2017		CRP3-000182063	CRP3-000182064	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2331	11/16/2017		CRP3-000188061	CRP3-000188062	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2338	08/00/2017		CRP3-000039133	CRP3-000039144	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2340	3/6/2017		CR2R-006003947	CR2R-006003950	Business Plans and Competitive Strategy		5 years
PX2343	5/26/2016		CR2R-003742634	CR2R-003742640	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
PX2345	10/24/2017		CRP3-000535641	CRP3-000535652	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2346	11/2/2017		CRP3-000535428	CRP3-000535429	Business Plans and Competitive Strategy		5 years
PX2347	8/22/2017		CRP3-000535221	CRP3-000535224	Confidential Financial Information and Forecasts; Cost Information; Business Plans and Competitive Strategy		5 years
PX2356	10/1/2017		CRP3-000191352	CRP3-000191368	Pricing Formulas/Models		Indefinite (or, in the alternative, at least 10 years)
PX2357	11/22/2017		CRP3-000520908	CRP3-000520920	Pricing Strategy; Confidential Financial Information and Forecasts		5 years
PX2358	1/5/2018		CRP3-000186762	CRP3-000186766	Pricing Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2360	9/29/2017		CRP3-000191372	CRP3-000191385	Pricing Formulas/Models		Indefinite (or, in the alternative, at least 10 years)
PX2363	8/29/2017		CRP3-000183001	CRP3-000183002	Pricing Formulas/Models		Indefinite (or, in the alternative, at least 10 years)
PX2364	9/28/2017		CRP3-000520159	CRP3-000520161	Customer-Specific Pricing Information; Product-Level Pricing Information		5 years
PX2365	1/13/2017		CRP3-000269670	CRP3-000269671	Customer-Specific Pricing Information		5 years
PX2366	9/1/2017		CRP3-000508363	CRP3-000508365	Product-Level Pricing Information		5 years
PX2367	12/11/2017		CRP3-000515700	CRP3-000515702	Pricing Formulas/Models		Indefinite (or, in the alternative, at least 10 years)
PX2368	6/2/2017		CRP3-000771163	CRP3-000771167	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2369	12/16/2015		CR2R-000533570	CR2R-000533597	Pricing Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2370	5/2/2017		CRP3-000531968	CRP3-000180011	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information		10 years
PX2371	12/6/2017		CRP3-000186409	CRP3-000186429	Cost Information; Proprietary Technical Information		10 years
PX2372	10/22/2017		CRP3-000189773	CRP3-000189778	Proprietary Technical Information		10 years
PX2373; RX0731	10/3/2017		CRP3-000191135	CRP3-000191207	Pricing Strategy; Business Plans and Competitive Strategy; Confidential Financial Information and Forecasts; Cost Information		5 years
PX2376	8/19/2017		CRP3-000227621	CRP3-000227626	Proprietary Technical Information		10 years
PX2377	10/12/2017		CRP3-000228672	CRP3-000228697	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2378; RX0866	10/13/2017		CRP3-000229060	CRP3-000229081	Cost Information; Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2380	11/6/2017	[REDACTED]	CRP3-000230909	CRP3-000230912	Proprietary Technical Information	[REDACTED]	10 years
PX2381	9/29/2017	[REDACTED]	CRP3-000241505	CRP3-000241508	Proprietary Technical Information	[REDACTED]	10 years
PX2382	10/12/2017	[REDACTED]	CRP3-000241724	CRP3-000241792	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information	[REDACTED]	10 years
PX2383	7/12/2017	[REDACTED]	CRP3-000505856	CRP3-000505899	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy	[REDACTED]	5 years
PX2385	1/6/2018	[REDACTED]	CRP3-000551450	CRP3-000551453	Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX2386	10/25/2017	[REDACTED]	CRP3-000551956	CRP3-000551958	Business Plans and Competitive Strategy	[REDACTED]	5 years
PX2387	12/20/2017	[REDACTED]	CRP3-000564853	CRP3-000564867	Production and Product Allocation Decisions	[REDACTED]	10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2390	12/28/2017		CRP3-000774830	CRP3-000774839	Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX2392	9/22/2017		CRP3-000626026	CRP3-000626036	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2393	9/25/2017		CRP3-000626598	CRP3-000626708	Confidential Financial Information and Forecasts; Cost Information; Proprietary Technical Information		10 years
PX2394	10/28/2017		CRP3-000629859	CRP3-000629871	Production and Product Allocation Decisions; Cost Information		10 years
PX2396	11/16/2017		CRP3-000633425	CRP3-000633428	Production and Product Allocation Decisions; Cost Information		10 years
PX2398	2016		CR2R-011839650	CR2R-011839890	Business Plans and Competitive Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2399	9/29/2017		CRP3-000233943	CRP3-000233947	Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2400	9/29/2017		CRP3-000233935	CRP3-000233938	Proprietary Technical Information		
PX2401	9/30/2017		CRP3-000234087	CRP3-000234124	Proprietary Technical Information		10 years
PX2402	10/3/2017		CRP3-000233965	CRP3-000233966	Proprietary Technical Information		10 years
PX2404	9/29/2017		CRP3-000233948	CRP3-000233952	Proprietary Technical Information		10 years
PX2406	10/6/2017		CRP3-000233391	CRP3-000233393	Cost Information; Proprietary Technical Information		10 years
PX2407	10/6/2017		CRP3-000233365	CRP3-000233375	Proprietary Technical Information		10 years
PX2408	10/17/2017		CRP3-000234948	CRP3-000234949	Production and Product Allocation Decisions		10 years
PX2410	10/26/2017		CRP3-000232579	CRP3-000232580	Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2411	11/1/2017		CRP3-000234619	CRP3-000234673	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2412	11/3/2017		CRP3-000230992	CRP3-000231001	Proprietary Technical Information		10 years
PX2413	11/6/2017		CRP3-000235112	CRP3-000235115	Proprietary Technical Information		10 years
PX2415	8/19/2017		CRP3-000238929	CRP3-000238935	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2416	9/18/2017		CRP3-000241916	CRP3-000241922	Proprietary Technical Information		10 years
PX2418	10/26/2017		CRP3-000234521	CRP3-000234527	Proprietary Technical Information		10 years
PX2420	8/19/2017		CRP3-000245057	CRP3-000245058	Production and Product Allocation Decisions		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2423	8/31/2017		CRP3-000244734	CRP3-000244735	Proprietary Technical Information		10 years
PX2425	9/29/2017		CRP3-000241505	CRP3-000241508	Proprietary Technical Information		10 years
PX2426	11/6/2017		CRP3-000230909	CRP3-000230912	Proprietary Technical Information		10 years
PX2427	11/6/2017		CRP3-000230926	CRP3-000230931	Proprietary Technical Information		10 years
PX2428	11/1/2017		CRP3-000552059	CRP3-000552063	Production and Product Allocation Decisions; Cost Information		10 years
PX2431	10/12/2017		CRP3-000237563	CRP3-000237631	Cost Information; Proprietary Technical Information		10 years
PX2433	11/18/2015		CR2R-001568001	CR2R-001568001	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions		10 years
PX2435	11/3/2015		CR2R-004014415	CR2R-004014415	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2438	5/7/2017		CR2R-006004150	CR2R-006004153	Sensitive Compensation and Benefits Information		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2439	12/19/2017		CRP3-000360084	CRP3-000360086	Sensitive Compensation and Benefits Information		5 years
PX2440	11/16/2017		CRP3-000360157	CRP3-000360168	Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2441	10/11/2017		CRP3-000360196	CRP3-000360210	Business Plans and Competitive Strategy		5 years
PX2446	8/12/2017		CRP3-000360797	CRP3-000360798	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2447	8/22/2017		CRP3-000360839	CRP3-000360840	Business Plans and Competitive Strategy		5 years
PX2452	2/1/2016		CR2R-008462689	CR2R-008462691	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2453; RX0782	1/19/2016		CR2R-000820531	CR2R-000820536	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2454	1/29/2016		CR2R-000814803	CR2R-000814804	Pricing Strategy; Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2455	1/29/2016		CR2R-000787749	CR2R-000787751	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2456	11/18/2015		CR2R-000525575	CR2R-000525576	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy		10 years
PX2457	10/30/2015		CRP3-000274970	CRP3-000274972	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2458	12/1/2017		CRP3-000520509	CRP3-000520513	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2459	11/3/2017		CRP3-000520608	CRP3-000520613	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2460	9/29/2017		CRP3-000520745	CRP3-000520749	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2461	8/5/2016		CRP3-000359243	CRP3-000359245	Product-Level Pricing Information; Production and Product Allocation Decisions		10 years
PX2462	3/31/2016		CR2R-000179382	CR2R-000179384	Pricing Formulas/Models; Customer-Specific Pricing Information; Product-Level Pricing Information		Indefinite (or, in the alternative, at least 10 years)

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2466	12/11/2017		CRP3-000202120	CRP3-000202127	Production and Product Allocation Decisions; Cost Information		10 years
PX2467	11/21/2017		CRP3-000194683	CRP3-000194690	Cost Information		5 years
PX2470	11/9/2017		CRP3-000193691	CRP3-000193703	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2471	11/7/2017		CRP3-000220838	CRP3-000220845	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2472	7/28/2017		CRP3-000532657	CRP3-000532664	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2474	11/6/2017		CRP3-000193836	CRP3-000193844	Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2475	6/2/2017		CRP3-000500599	CRP3-000500602	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2476	12/18/2017		CRP3-000232929	CRP3-000232965	Cost Information; Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2478	10/24/2017		CRP3-000553491	CRP3-000553492	Proprietary Technical Information		10 years
PX2479	10/25/2017		CRP3-000552828	CRP3-000552830	Production and Product Allocation Decisions		10 years
PX2480	12/28/2017		CRP3-000551415	CRP3-000551420	Proprietary Technical Information		10 years
PX2482	11/2/2017		CRP3-000552029	CRP3-000552035	Proprietary Technical Information		10 years
PX2484	10/14/2017		CRP3-000553281	CRP3-000553282	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2485	10/24/2017		CRP3-000553523	CRP3-000553527	Production and Product Allocation Decisions		10 years
PX2486	9/22/2017		CRP3-000240593	CRP3-000240596	Business Plans and Competitive Strategy		5 years
PX2487	10/6/2017		CRP3-000248365	CRP3-000248379	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2488	12/13/2017		CRP3-000797246	CRP3-000797266	Proprietary Technical Information		10 years
PX2489	1/5/2018		CRP3-00186806	CRP3-00186807	Proprietary Technical Information		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2490	12/20/2017		CRP3-000189745	CRP3-000189746	Production and Product Allocation Decisions; Cost Information		10 years
PX2492	1/4/2018		CRP3-000227455	CRP3-000227456	Production and Product Allocation Decisions; Cost Information		10 years
PX2493	9/4/2017		CRP3-000241242	CRP3-000241244	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2495	1/4/2018		CRP3-000531043	CRP3-000531048	Cost Information		5 years
PX2496	12/5/2017		CRP3-000569629	CRP3-000569631	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX5000; RX1063	4/6/2018		PX5000-001	PX5000-171	Product-Level Pricing Information; Business Plans and Competitive Strategy		5 years
PX5001; RX1064	4/6/2018		PX5001-001	PX5001-056	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX6000	12/16/2011		FTC-PROD-0073442	FTC-PROD-0073444	Pricing Strategy; Confidential Financial Information and Forecasts; Litigation Protective Order		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6001	5/22/2012		FTC-PROD-0079534	FTC-PROD-0079543	Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6002	9/20/2011		FTC-PROD-0082452	FTC-PROD-0082455	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6004	1/15/2001		FTC-PROD-0037738	FTC-PROD-0037741	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
PX6005	1/9/2007		FTC-PROD-0037872 FTC-PROD-0037872	FTC-PROD-0037901 FTC-PROD-0037872	Confidential Financial Information and Forecasts; Cost Information; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6006	4/19/2002		FTC-PROD-0038062	FTC-PROD-0038066	Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6007	7/31/2003		FTC-PROD-0038398	FTC-PROD-0038399	Production and Product Allocation Decisions; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6008	8/4/2003		FTC-PROD-0038409	FTC-PROD-0038410	Business Plans and Competitive Strategy; Litigation Protective Order		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6010	8/25/2004		FTC-PROD-0038502	FTC-PROD-0038505	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6011	9/13/2004		FTC-PROD-0038511 FTC-PROD-0038511	FTC-PROD-0038512 FTC-PROD-0038511	Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6012	9/14/2004		FTC-PROD-0038513 FTC-PROD-0038513	FTC-PROD-0038514 FTC-PROD-0038514	Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6013	1/25/2005		FTC-PROD-0038674	FTC-PROD-0038679	Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Customer-Specific Pricing Information; Litigation Protective Order		5 years
PX6014	2/22/2005		FTC-PROD-0038694	FTC-PROD-0038696	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6016	3/8/2005		FTC-PROD-0038847	FTC-PROD-0038854	Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6017	6/16/2006		FTC-PROD-0038981	FTC-PROD-0038984	Litigation Protective Order		In Accordance with Protective Order
PX6018	6/20/2006		FTC-PROD-0038985	FTC-PROD-0038987	Litigation Protective Order		In Accordance with Protective Order

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6019	7/12/2007		FTC-PROD-0039128	FTC-PROD-0039131	Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6020	10/10/2007		FTC-PROD-0039148	FTC-PROD-0039150	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6023	12/14/2007		FTC-PROD-0039168	FTC-PROD-0039169	Pricing Strategy; Litigation Protective Order		5 years
PX6026	6/3/2008		FTC-PROD-0039318	FTC-PROD-0039319	Pricing Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6029	10/24/2008		FTC-PROD-0039412	FTC-PROD-0039415	Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
PX6030	12/4/2008		FTC-PROD-0046920	FTC-PROD-0046921	Litigation Protective Order		In Accordance with Protective Order
PX6033	9/18/2003		FTC-PROD-0040039	FTC-PROD-0040041	Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6035	10/3/2012		FTC-PROD-0076505	FTC-PROD-0076508	Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy; Litigation Protective Order		5 years
PX6036	9/27/2007		FTC-PROD-0077172	FTC-PROD-0077173	Litigation Protective Order		In Accordance with Protective Order
PX6037	10/6/2006		FTC-PROD-0077184	FTC-PROD-0077186	Litigation Protective Order		In Accordance with Protective Order

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6038	11/21/2002		FTC-PROD-0077226	FTC-PROD-0077228	Litigation Protective Order		In Accordance with Protective Order
PX6039	12/8/2011		FTC-PROD-0077324	FTC-PROD-0077336	Pricing Strategy; Proprietary Technical Information; Business Plans and Competitive Strategy; Litigation Protective Order		10 years
PX6040	4/5/2012		FTC-PROD-0079407	FTC-PROD-0079410	Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
PX6042	9/13/2009		FTC-PROD-0082571	FTC-PROD-0082578	Litigation Protective Order		In Accordance with Protective Order
PX6043	9/2/2008		FTC-PROD-0082983	FTC-PROD-0082984	Pricing Strategy; Litigation Protective Order		5 years
PX6044	5/23/2008		FTC-PROD-0082991	FTC-PROD-0082994	Pricing Strategy; Litigation Protective Order		5 years
PX6045	8/15/2011		FTC-PROD-0083286	FTC-PROD-0083290	Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
PX6046	5/15/2013		FTC-PROD-0090724	FTC-PROD-0090726	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX6047	5/22/2012		CR2R7G-000087834	CR2R7G-000087834	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6049	9/1/2015		FTC-PROD-0064536	FTC-PROD-0064572	Customer-Specific Pricing Information; Litigation Protective Order		5 years
PX6050	4/19/2013		FTC-PROD-0036432	FTC-PROD-0036463	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX7000; RX0179	9/12/2017		PX7000-001	PX7000-066	Pricing Formulas/Models; Customer-Specific Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX7004; RX0177	9/19/2017		PX7004-001	PX7004-047	Pricing Formulas/Models; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX7006; RX0182	9/21/2017		PX7006-001	PX7006-100	Pricing Formulas/Models; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX7008; RX0178	9/26/2017		PX7008-001	PX7008-094	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX7009; RX0142	2/8/2018		PX7009-001	PX7009-077	Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX7010; RX0134	2/2/2018		PX7010-001	PX7010-064	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX7017; RX0124	3/9/2018	[REDACTED]	PX7017-001	PX7017-079	Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX7018; RX0122	3/13/2018	[REDACTED]	PX7018-001	PX7018-071	Pricing Strategy; Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX7032; RX0147	3/22/2018	[REDACTED]	PX7032-001	PX7032-055	Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy; Sensitive Compensation and Benefits Information	[REDACTED]	10 years
PX7037; RX0116	3/21/2018	[REDACTED]	PX7037-001	PX7037-054	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX7042; RX0117	3/27/2018	[REDACTED]	PX7042-001	PX7042-072	Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX7043; RX0129	3/27/2018	[REDACTED]	PX7043-001	PX7043-052	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions; Business Plans and Competitive Strategy	[REDACTED]	10 years
PX7048; RX0148	4/3/2018	[REDACTED]	PX7048-001	PX7048-088	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy	[REDACTED]	10 years
RX0108	August 2017	[REDACTED]	n/a	n/a	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information	[REDACTED]	10 years
RX0606	1/4/2017	[REDACTED]	CR2R-002472206	CR2R-002472211	Business Plans and Competitive Strategy	[REDACTED]	5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0607	4/9/2016		CR2R-002881125	CR2R-002881147	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
RX0608	8/29/2015		CR2R-003724440	CR2R-003724513	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
RX0609	7/14/2014		CR2R-005155734	CR2R-005155862	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
RX0611	11/2/2015		n/a	n/a	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0614	12/22/2016		CR2R-006539202	CR2R-006539246	Cost Information; Proprietary Technical Information		10 years
RX0627	12/21/2012		CR2R7G-000052216		Pricing Strategy; Litigation Protective Order		5 years
RX0628	4/19/2013		CR2R7G-000104207		Litigation Protective Order		In Accordance with Protective Order
RX0630	9/7/2012		CR2R-001034838	CR2R-001034843	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0631	1/17/2015		CR2R-003148835	CR2R-003148839	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0632	1/25/2013		CR2R-003171154	CR2R-003171157	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0634	4/5/2013		CR2R-005643644	CR2R-005643646	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0635	9/1/2016		CR2R-008430653	CR2R-008430654	Customer Negotiations and Internal Customer Strategy		10 years
RX0636	1/8/2015		CR2R-009884583	CR2R-009884584	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0645	10/26/2012 16:54		CR2R-001034563	CR2R-001034567	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0646	1/8/2016 3:02		CR2R-003145104	CR2R-003145107	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
RX0647	10/11/2016 15:29		CR2R-011685708	CR2R-011685712	Customer Negotiations and Internal Customer Strategy		10 years
RX0663	8/5/2015		CR2R-000829360	CR2R-000829367	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0667	11/13/2015		CR2R-002927396	CR2R-002927398	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0668	9/9/2015		CR2R-003725033	CR2R-003725075	Cost Information		5 years
RX0670	9/24/2015		CR2R-008081722	CR2R-008081723	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0671	8/28/2015		CR2R-008082874	CR2R-008082876	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0672	8/3/2015		CR2R-008084550	CR2R-008084552	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0674	6/22/2017		CR2R-011268710	CR2R-011268719	Proprietary Technical Information		10 years
RX0675	10/31/2016		CR2R-000122386	CR2R-000122450	Proprietary Technical Information		10 years
RX0676	4/2/2015		CR2R-000185960	CR2R-000185960	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0679	3/14/2016		CR2R-000776865	CR2R-000776867	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0680	3/20/2015		CR2R-001004863	CR2R-001004867	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0681	2/8/2017		CR2R-001018534	CR2R-001018534	Product-Level Pricing Information; Pricing Strategy		5 years
RX0683	8/1/2016		CR2R-002207635	CR2R-002207636	Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions; Proprietary Technical Information		10 years
RX0684	1/12/2017		CR2R-002472308	CR2R-002472333	Production and Product Allocation Decisions		10 years
RX0685	5/7/2013		CR2R-002631483	CR2R-002631483	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0686	10/16/2015		CR2R-002907954	CR2R-002907958	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0688	6/5/2015		CR2R-003147043	CR2R-003147045	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0690	1/17/2014		CR2R-003169516	CR2R-003169519	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0692	6/11/2015		CR2R-003252551	CR2R-003252569	Business Plans and Competitive Strategy		5 years
RX0693	1/13/2016		CR2R-003266575	CR2R-003266594	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
RX0694	2/5/2015		CR2R-003721050	CR2R-003721083	Pricing Strategy; Confidential Financial Information and Forecasts		5 years
RX0695	5/16/2015		CR2R-003791999	CR2R-003792047	Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0697	4/13/2016		CR2R-004567089	CR2R-004567111	Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy		10 years
RX0698	3/25/2016		CR2R-005454412	CR2R-005454416	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy		10 years
RX0699	12/18/2015		CR2R-005454927	CR2R-005454930	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0701	7/11/2015		CR2R-005629013	CR2R-005629017	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0702	5/8/2015		CR2R-005629223	CR2R-005629226	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0703	4/10/2015		CR2R-005629382	CR2R-005629385	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0704	4/3/2015		CR2R-005629425	CR2R-005629428	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0705	2/6/2015		CR2R-005629640	CR2R-005629644	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0706	1/9/2015		CR2R-005629815	CR2R-005629819	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0707	10/17/2014		CR2R-005641932	CR2R-005641935	Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0708	10/31/2013		CR2R-005651053	CR2R-005651135	Pricing Strategy; Business Plans and Competitive Strategy		5 years
RX0709	8/27/2015		CR2R-008082934	CR2R-008082937	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0710	8/18/2015		CR2R-008083861	CR2R-008083863	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0711	8/14/2015		CR2R-008083938	CR2R-008083940	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0712	7/10/2015		CR2R-008085824	CR2R-008085826	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0713	8/19/2016		CR2R-008120521	CR2R-008120541	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0714	8/6/2017		CR2R-010627621	CR2R-010627631	Cost Information		5 years
RX0715	5/24/2017		CR2R-010628331	CR2R-010628357	Confidential Financial Information and Forecasts; Cost Information; Business Plans and Competitive Strategy		5 years
RX0716	8/6/2015		CR2R-011581942	CR2R-011581944	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0717	10/10/2016		CR2R-011650954	CR2R-011650981	Product-Level Pricing Information; Pricing Strategy; Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
RX0718	1/8/2016		CR2R-011674330	CR2R-011674347	Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0725	September 2017		n/a	n/a	Confidential Financial Information and Forecasts		5 years
RX0726	7/9/1905		n/a	n/a	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
RX0728	9/20/2016		CR2R-005252392	CR2R-005252408	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0760	6/28/2012 9:30		CR2R7G-000062352	CR2R7G-000062720	Litigation Protective Order		In Accordance with Protective Order
RX0772	3/12/2012		CR2R-000316937	CR2R-000316950	Customer-Specific Pricing Information; Pricing Strategy		5 years
RX0773	8/15/2014		CR2R-000372030	CR2R-000372033	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0776	5/27/2016		CR2R-000747511	CR2R-000747513	Production and Product Allocation Decisions		10 years
RX0777	11/6/2015		CR2R-000778788	CR2R-000778795	Product-Level Pricing Information; Pricing Strategy; Business Plans and Competitive Strategy		5 years
RX0779	9/1/2016		CR2R-000788715	CR2R-000788716	Customer Negotiations and Internal Customer Strategy		10 years
RX0780	8/13/2015		CR2R-000802519	CR2R-000802520	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0781	2/4/2016		CR2R-000814970	CR2R-000814973	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0786	12/7/2016		CR2R-000985508	CR2R-000985510	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0788	8/31/2015		CR2R-001026810	CR2R-001026812	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0790	10/11/2013		CR2R-001033505	CR2R-001033508	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0791	5/2/2013		CR2R-001042166	CR2R-001042169	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0792	12/1/2014		CR2R-001055977	CR2R-001055979	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0800	11/5/2014		CR2R-001203434	CR2R-001203435	Customer-Specific Pricing Information; Business Plans and Competitive Strategy		5 years
RX0801	2/17/2014		CR2R-001237840	CR2R-001237855	Product-Level Pricing Information; Production and Product Allocation Decisions		5 years
RX0802	5/23/2013		CR2R-001344285	CR2R-001344286	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0804	11/4/2012		CR2R-001355683	CR2R-001355685	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0805	5/18/2012		CR2R-001451191	CR2R-001451194	Customer-Specific Pricing Information; Pricing Strategy		5 years
RX0806	4/20/2015		CR2R-001486282	CR2R-001486285	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0807	10/30/2015		CR2R-001537323	CR2R-001537324	Pricing Strategy; Business Plans and Competitive Strategy		5 years
RX0808	10/16/2014		CR2R-001553529	CR2R-001553531	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0809	5/23/2015		CR2R-001570268	CR2R-001570272	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions		10 years
RX0816	9/15/2015		CR2R-001967997	CR2R-001968000	Customer Negotiations and Internal Customer Strategy		10 years
RX0817	7/6/2016		CR2R-001981003	CR2R-001981008	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0818	8/23/2016		CR2R-001983755	CR2R-001983755	Production and Product Allocation Decisions; Cost Information		10 years
RX0819	8/15/2014		CR2R-002074884	CR2R-002074888	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0820	5/29/2015		CR2R-002095355	CR2R-002095356	Pricing Strategy		5 years
RX0822	8/23/2016		CR2R-002104671	CR2R-002104671	Proprietary Technical Information		10 years
RX0824	12/6/2016		CR2R-002176747	CR2R-002176797	Proprietary Technical Information		10 years
RX0825	8/24/2016		CR2R-002206713	CR2R-002206713	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
RX0827	5/11/2016		CR2R-002210668	CR2R-002210671	Business Plans and Competitive Strategy		5 years
RX0828	6/30/2016		CR2R-002270157	CR2R-002270158	Business Plans and Competitive Strategy		5 years
RX0829	5/27/2016		CR2R-002270806	CR2R-002270807	Proprietary Technical Information		10 years
RX0831	5/1/2015		CR2R-002276731	CR2R-002276736	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0832	9/15/2014		CR2R-002351999	CR2R-002352000	Customer-Specific Pricing Information; Pricing Strategy		5 years
RX0833	1/6/2012		CR2R-002672192	CR2R-002672195	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0834	1/24/2014		CR2R-003185104	CR2R-003185105	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0835	12/14/2015		CR2R-004545272	CR2R-004545289	Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0836	10/9/2013		CR2R-005003401	CR2R-005003403	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0837	7/15/2013		CR2R-005004720	CR2R-005004721	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0838	6/19/2014		CR2R-005020359	CR2R-005020360	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0839	3/9/2017		CR2R-005150472	CR2R-005150490	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
RX0840	6/10/2015		CR2R-005161117	CR2R-005161143	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
RX0841	12/6/2016		CR2R-005163929	CR2R-005163941	Business Plans and Competitive Strategy		5 years
RX0842	12/2/2015		CR2R-005205821	CR2R-005205964	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
RX0845	5/31/2017		CR2R-005398198	CR2R-005398199	Cost Information; Business Plans and Competitive Strategy		5 years
RX0847	7/8/2016		CR2R-005458758	CR2R-005458807	Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0848	7/27/2015		CR2R-005637336	CR2R-005637337	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0849	9/26/2014		CR2R-005729539	CR2R-005729542	Customer Negotiations and Internal Customer Strategy		5 years
RX0851	8/21/2016		CR2R-006560000	CR2R-006560003	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
RX0853	1/16/2014		CR2R-006863807	CR2R-006863812	Proprietary Technical Information		10 years
RX0854	9/10/2015		CR2R-006953906	CR2R-006953908	Production and Product Allocation Decisions		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0856	6/23/2015		CR2R-007872924	CR2R-007872933	Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0857	5/30/2017		CR2R-008391190	CR2R-008391191	Proprietary Technical Information		10 years
RX0858	12/9/2016		CR2R-008476693	CR2R-008476694	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0860	1/22/2017		CR2R-008698260	CR2R-008698260	Business Plans and Competitive Strategy		5 years
RX0861	6/8/2017		CR2R-010501622	CR2R-010501707	Business Plans and Competitive Strategy		5 years
RX0862	4/19/2016 0:00		CR2R-011014502	CR2R-011014542	Confidential Financial Information and Forecasts; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0863	9/21/2016		CR2R-011527653	CR2R-011527669	Production and Product Allocation Decisions; Cost Information		10 years
RX0864	2/11/2015		CR2R-011598686	CR2R-011598724	Pricing Strategy; Cost Information		5 years
RX0865	12/17/2017		CRP3-000219749	CRP3-000219751	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
RX0867	8/26/2017		CRP3-000238796	CRP3-000238797	Business Plans and Competitive Strategy		5 years
RX0869	12/13/2017		CRP3-000516627	CRP3-000516628	Business Plans and Competitive Strategy		5 years
RX0870	9/25/2017		CRP3-000626674	CRP3-000626707	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0896	5/3/2012		CR2R7G-000084763	CR2R7G-000084963	Litigation Protective Order		In Accordance with Protective Order
RX1019	6/12/2015		CR2R7G-000002901	CR2R7G-000003264	Pricing Strategy; Litigation Protective Order		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX1022	4/10/2015		CR2R7G-000008663	CR2R7G-000008728	Pricing Strategy; Litigation Protective Order		5 years
RX1023	4/25/2016		CR2R7G-000008787	CR2R7G-000008839	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		In Accordance with Protective Order
RX1024	7/17/2015		CR2R7G-000009013	CR2R7G-000009020	Litigation Protective Order		In Accordance with Protective Order
RX1025	1/22/2015		CR2R7G-000010398	CR2R7G-000010472	Litigation Protective Order		In Accordance with Protective Order
RX1026	7/26/2011		CR2R7G-000012592	CR2R7G-000012604	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		In Accordance with Protective Order
RX1027	1/5/2012		CR2R7G-000012869	CR2R7G-000012870	Litigation Protective Order		In Accordance with Protective Order
RX1028	1/6/2012		CR2R7G-000012874	CR2R7G-000012878	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
RX1029	1/9/2012		CR2R7G-000012879	CR2R7G-000012880	Litigation Protective Order		In Accordance with Protective Order
RX1030	1/5/2012		CR2R7G-000012891	CR2R7G-000012892	Litigation Protective Order		In Accordance with Protective Order
RX1031	12/12/2011		CR2R7G-000012893	CR2R7G-000012894	Litigation Protective Order		In Accordance with Protective Order
RX1032	4/25/2016		CR2R7G-000012941	CR2R7G-000013008	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX1034	2/3/2015		CR2R7G-000018822	CR2R7G-000019161	Litigation Protective Order		In Accordance with Protective Order
RX1035	12/21/2012		CR2R7G-000049709	CR2R7G-000049841	Pricing Strategy; Litigation Protective Order		In Accordance with Protective Order
RX1036	12/21/2012		CR2R7G-000049842	CR2R7G-000050001	Litigation Protective Order		In Accordance with Protective Order
RX1037	12/21/2012		CR2R7G-000050002	CR2R7G-000050267	Pricing Strategy; Litigation Protective Order		5 years
RX1038	2/05/2013		CR2R7G-000052086	CR2R7G-000052090	Pricing Strategy; Litigation Protective Order		5 years
RX1039	3/27/2012		CR2R7G-000080708	CR2R7G-000081154	Litigation Protective Order		In Accordance with Protective Order
RX1040	4/24/2012		CR2R7G-000083993	CR2R7G-000084246	Litigation Protective Order		In Accordance with Protective Order
RX1115	1/24/2012		CR2R-000695598	CR2R-000695598	Confidential Financial Information and Forecasts		5 years
RX1116	10/19/2012		CR2R-001134941	CR2R-001134944	Business Plans and Competitive Strategy		5 years
RX1117	2/27/2015		CR2R-007651679	CR2R-007651719	Confidential Financial Information and Forecasts; Cost Information; Business Plans and Competitive Strategy		5 years
RX1120	3/03/2018		CRP3-000866618	CRP3-000866618	Production and Product Allocation Decisions		10 years
RX1254	11/02/2015		CR2R-011271887	CR2R-011271975	Business Plans and Competitive Strategy		5 years

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EXHIBIT 5

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UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES

_____)
 In the Matter of)
)
 Tronox Limited,)
 a corporation,)
)
 National Industrialization Company)
 (TASNEE))
 a corporation,)
)
 National Titanium Dioxide Company)
 Limited (Cristal))
 a corporation, and)
)
 Cristal USA Inc.)
 a corporation,)
)
 Respondents.)
 _____)

DOCKET NO. 9377

PROTECTIVE ORDER GOVERNING CONFIDENTIAL MATERIAL

Commission Rule 3.31(d) states: "In order to protect the parties and third parties against improper use and disclosure of confidential information, the Administrative Law Judge shall issue a protective order as set forth in the appendix to this section." 16 C.F.R. § 3.31(d). Pursuant to Commission Rule 3.31(d), the protective order set forth in the appendix to that section is attached verbatim as Attachment A and is hereby issued.

ORDERED:

Dm Chappell

 D. Michael Chappell
 Chief Administrative Law Judge

Date: December 7, 2017

ATTACHMENT A

For the purpose of protecting the interests of the parties and third parties in the above-captioned matter against improper use and disclosure of confidential information submitted or produced in connection with this matter:

IT IS HEREBY ORDERED THAT this Protective Order Governing Confidential Material ("Protective Order") shall govern the handling of all Discovery Material, as hereafter defined.

1. As used in this Order, "confidential material" shall refer to any document or portion thereof that contains privileged, competitively sensitive information, or sensitive personal information. "Sensitive personal information" shall refer to, but shall not be limited to, an individual's Social Security number, taxpayer identification number, financial account number, credit card or debit card number, driver's license number, state-issued identification number, passport number, date of birth (other than year), and any sensitive health information identifiable by individual, such as an individual's medical records. "Document" shall refer to any discoverable writing, recording, transcript of oral testimony, or electronically stored information in the possession of a party or a third party. "Commission" shall refer to the Federal Trade Commission ("FTC"), or any of its employees, agents, attorneys, and all other persons acting on its behalf, excluding persons retained as consultants or experts for purposes of this proceeding.
2. Any document or portion thereof submitted by a respondent or a third party during a Federal Trade Commission investigation or during the course of this proceeding that is entitled to confidentiality under the Federal Trade Commission Act, or any regulation, interpretation, or precedent concerning documents in the possession of the Commission, as well as any information taken from any portion of such document, shall be treated as confidential material for purposes of this Order. The identity of a third party submitting such confidential material shall also be treated as confidential material for the purposes of this Order where the submitter has requested such confidential treatment.
3. The parties and any third parties, in complying with informal discovery requests, disclosure requirements, or discovery demands in this proceeding may designate any responsive document or portion thereof as confidential material, including documents obtained by them from third parties pursuant to discovery or as otherwise obtained.
4. The parties, in conducting discovery from third parties, shall provide to each third party a copy of this Order so as to inform each such third party of his, her, or its rights herein.
5. A designation of confidentiality shall constitute a representation in good faith and after careful determination that the material is not reasonably believed to be already in the public domain and that counsel believes the material so designated constitutes confidential material as defined in Paragraph 1 of this Order.

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6. Material may be designated as confidential by placing on or affixing to the document containing such material (in such manner as will not interfere with the legibility thereof), or if an entire folder or box of documents is confidential by placing or affixing to that folder or box, the designation "CONFIDENTIAL – FTC Docket No. 9377" or any other appropriate notice that identifies this proceeding, together with an indication of the portion or portions of the document considered to be confidential material. Confidential information contained in electronic documents may also be designated as confidential by placing the designation "CONFIDENTIAL – FTC Docket No. 9377" or any other appropriate notice that identifies this proceeding, on the face of the CD or DVD or other medium on which the document is produced. Masked or otherwise redacted copies of documents may be produced where the portions deleted contain privileged matter, provided that the copy produced shall indicate at the appropriate point that portions have been deleted and the reasons therefor.

7. Confidential material shall be disclosed only to: (a) the Administrative Law Judge presiding over this proceeding, personnel assisting the Administrative Law Judge, the Commission and its employees, and personnel retained by the Commission as experts or consultants for this proceeding; (b) judges and other court personnel of any court having jurisdiction over any appellate proceedings involving this matter; (c) outside counsel of record for any respondent, their associated attorneys and other employees of their law firm(s), provided they are not employees of a respondent; (d) anyone retained to assist outside counsel in the preparation or hearing of this proceeding including consultants, provided they are not affiliated in any way with a respondent and have signed an agreement to abide by the terms of the protective order; and (e) any witness or deponent who may have authored or received the information in question.

8. Disclosure of confidential material to any person described in Paragraph 7 of this Order shall be only for the purposes of the preparation and hearing of this proceeding, or any appeal therefrom, and for no other purpose whatsoever, provided, however, that the Commission may, subject to taking appropriate steps to preserve the confidentiality of such material, use or disclose confidential material as provided by its Rules of Practice; sections 6(f) and 21 of the Federal Trade Commission Act; or any other legal obligation imposed upon the Commission.

9. In the event that any confidential material is contained in any pleading, motion, exhibit or other paper filed or to be filed with the Secretary of the Commission, the Secretary shall be so informed by the Party filing such papers, and such papers shall be filed *in camera*. To the extent that such material was originally submitted by a third party, the party including the materials in its papers shall immediately notify the submitter of such inclusion. Confidential material contained in the papers shall continue to have *in camera* treatment until further order of the Administrative Law Judge, provided, however, that such papers may be furnished to persons or entities who may receive confidential material pursuant to Paragraphs 7 or 8. Upon or after filing any paper containing confidential material, the filing party shall file on the public record a duplicate copy of the paper that does not reveal confidential material. Further, if the protection for any such material expires, a party may file on the public record a duplicate copy which also contains the formerly protected material.

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10. If counsel plans to introduce into evidence at the hearing any document or transcript containing confidential material produced by another party or by a third party, they shall provide advance notice to the other party or third party for purposes of allowing that party to seek an order that the document or transcript be granted *in camera* treatment. If that party wishes *in camera* treatment for the document or transcript, the party shall file an appropriate motion with the Administrative Law Judge within 5 days after it receives such notice. Except where such an order is granted, all documents and transcripts shall be part of the public record. Where *in camera* treatment is granted, a duplicate copy of such document or transcript with the confidential material deleted therefrom may be placed on the public record.

11. If any party receives a discovery request in any investigation or in any other proceeding or matter that may require the disclosure of confidential material submitted by another party or third party, the recipient of the discovery request shall promptly notify the submitter of receipt of such request. Unless a shorter time is mandated by an order of a court, such notification shall be in writing and be received by the submitter at least 10 business days before production, and shall include a copy of this Protective Order and a cover letter that will apprise the submitter of its rights hereunder. Nothing herein shall be construed as requiring the recipient of the discovery request or anyone else covered by this Order to challenge or appeal any order requiring production of confidential material, to subject itself to any penalties for non-compliance with any such order, or to seek any relief from the Administrative Law Judge or the Commission. The recipient shall not oppose the submitter's efforts to challenge the disclosure of confidential material. In addition, nothing herein shall limit the applicability of Rule 4.11(e) of the Commission's Rules of Practice, 16 CFR 4.11(e), to discovery requests in another proceeding that are directed to the Commission.

12. At the time that any consultant or other person retained to assist counsel in the preparation of this action concludes participation in the action, such person shall return to counsel all copies of documents or portions thereof designated confidential that are in the possession of such person, together with all notes, memoranda or other papers containing confidential information. At the conclusion of this proceeding, including the exhaustion of judicial review, the parties shall return documents obtained in this action to their submitters, provided, however, that the Commission's obligation to return documents shall be governed by the provisions of Rule 4.12 of the Rules of Practice, 16 CFR 4.12.

13. The provisions of this Protective Order, insofar as they restrict the communication and use of confidential discovery material, shall, without written permission of the submitter or further order of the Commission, continue to be binding after the conclusion of this proceeding.