

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



ORIGINAL

In the Matter of)
)
BENCO DENTAL SUPPLY CO.,)
a corporation,)
)
HENRY SCHEIN, INC.)
a corporation, and)
)
PATTERSON COMPANIES, INC.,)
a corporation)
)
Respondents)
_____)

PUBLIC

DOCKET NO. 9379

NON-PARTY THE ATLANTA DENTAL SUPPLY COMPANY’S MOTION FOR IN
CAMERA TREATMENT

Pursuant to Rule 3.45 of the Federal Trade Commission's Rules of Practice, 16 C.F.R. §3.45(b), non-party The Atlanta Dental Supply Company. (“ADS”) respectfully moves this Court for in camera treatment of competitively-sensitive, confidential business documents and sales data (the “Confidential Documents”). ADS produced these documents, among others, in response to a third-party subpoena in this matter. The Federal Trade Commission (“FTC”) has now notified ADS that it intends to introduce all of ADS's documents, including the Confidential Documents, into evidence at the administrative trial in this matter. See Letter from the Federal Trade Commission dated September 17, 2018 (attached as Exhibit A).

The Confidential Documents, which includes sales pricing for dental supplies, products and equipment, warrant additional protection from public disclosure given the sensitive business information contained therein. Thus, ADS submits this Motion requesting permanent in camera

treatment of the Confidential Documents in their entirety. All of the materials for which ADS is seeking in camera treatment are confidential business documents, such that if they were to become part of the public record, ADS would be significantly harmed in its ability to compete in the sale of dental supply products. For the reasons discussed in this motion, ADS requests that this Court afford its confidential business documents in camera treatment indefinitely. In support of this motion, ADS relies on the Affidavit of Tom Richardson ("Richardson Declaration"), attached as Exhibit B, which provides additional details on the documents for which ADS is seeking in camera retention.

I. The Documents for Which Protection is Sought

ADS seeks in camera treatment for the following Confidential Documents.

Exhibit No.	Full Name	Date	BegBates	EndBates
CX4129	Letter from: John Williams to: Devon Allen subject: ["Atlanta Dental's Production of Documents and Data Pursuant to FTC Subpoena"]	5/24/2018	FTC-ADS-000167	FTC-ADS-000176
CX4442	Data Dictionary.xlsx FTC-Data_2009.xlsx FTC-Data_2010.xlsx FTC-Data_2011.xlsx FTC-Data_2012.xlsx FTC-Data_2013.xlsx FTC-Data_2014.xlsx FTC-Data_2015.xlsx FTC-Data_2016.xlsx FTC-Data_2017.xlsx		CX4442-001	CX4442-001

II. ADS Documents are Secret and Material such that Disclosure Would Result in Serious Injury to ADS

In camera treatment of material is appropriate when its "public disclosure will likely result in a clearly defined, serious injury to the person, partnership, or corporation requesting" such treatment. 16 C.F.R. § 3.45(b). The proponent demonstrates serious competitive injury by showing

that the documents are secret and that they are material to the business. *In re General Foods Corp.*, 95 F.T.C. 352, 355 (1980); *In re Dura Lube Corp.*, 1999 F.T.C. LEXIS 255, *5 (1999). In this context, courts generally attempt to protect confidential business information from unnecessary airing." *H.P. Hood & Sons, Inc.*, 58 F.T.C. 1184, 1188 (1961). In considering both secrecy and materiality, the Court may consider: (1) the extent to which the information is known outside of the business; (2) the extent to which it is known by employees and others involved in the business; (3) the extent of measures taken to guard the secrecy of the information; (4) the value of the information to the business and its competitors; (5) the amount of effort or money expended in developing the information; and (6) the ease or difficulty with which the information could be acquired or duplicated by others. *In re Bristol Myers Co.*, 90 F.T.C. 455, 456-457 (1977)

The Confidential Documents are both secret and material to ADS's business as discussed in detail in the Richardson Declaration. In sum, the materials at issue contain information of competitive significance to ADS, such as pricing of dental products and territorial area of sales. Richardson declaration at ¶¶ 2-6. Significantly, ADS competes directly with sales of dental products and in the same geographic territory as the respondents and other dental supply companies. As a seller in a very competitive industry, ADS seeks to keep its customer lists, locale of its individual customers, and its pricing confidential as do other competitors in the dental supply business. Such information is proprietary to ADS and not generally or publicly known outside of ADS. *Id.* Indeed, when ADS produced the Confidential Documents, it took steps to maintain confidentiality by designating the documents "Confidential" and produced them only for review by trial counsel for the respondents, and limiting other counsel, including in-house counsel for the respondents from review of the subpoenaed Confidential Documents., This was done pursuant to the Protective Order in this case. Because of the highly confidential and proprietary nature of the

information and its materiality to ADS's business, in camera treatment is appropriate. Further, disclosure of the Confidential Documents will result in the loss of a business advantage to ADS. See *In re Dura Lube Corp.*, 1999 FTC LEXIS 255 at *7 (Dec. 23, 1999) ("The likely loss of business advantages is a good example of a 'clearly defined, serious injury.>"). Making such documents public would result in a loss of business advantage that ADS has built in safeguarding its customer lists and pricing. ADS is a relatively smaller dental supply dealer compared to the respondents, whose volume sales allegedly make up 85% of dental supply sales in the United States. Finally, ADS's status as a third party is relevant to the treatment of its documents. The FTC has held that "[t]here can be no question that the confidential records of businesses involved in Commission proceedings should be protected insofar as possible." *H.P. Hood & Sons*, 58 F.T.C. at 1186. This is especially so in the case of a third-party, which deserves "special solicitude" in its request for in camera treatment for its confidential business information. See *In re Kaiser Aluminum & Chem. Corp.*, 103 FTC 500, 500 (1984) ("As a policy matter, extensions of confidential or *in camera* treatment in appropriate cases involving third party bystanders encourages cooperation with future adjudicative discovery requests."). ADS's third-party status therefore weighs in favor of granting *in camera* status to the Confidential Documents.

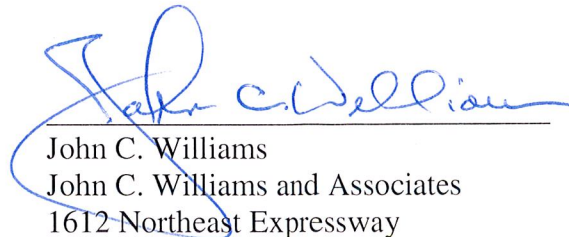
III. The Confidential Documents Contain Trade Secrets, which will Remain Sensitive Over Time and Thus, Permanent In Camera Treatment is Justified

Given the highly sensitive nature of the information contained in the Confidential Documents, especially the sales data, containing pricing, customer, and areas of sales, ADS requests that they be given in camera treatment indefinitely.

IV. Conclusion

For the reasons set forth above and in the accompanying Richardson Declaration, ADS respectfully request that this court grant permanent in camera treatment for the Confidential Documents in their entirety.

Dated: September 25, 2018



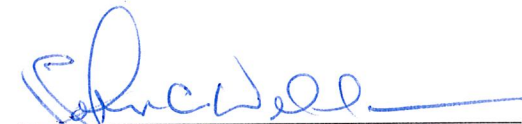
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Counsel for non-party,
The Atlanta Dental Supply Company.

STATEMENT REGARDING MEET AND CONFER

The undersigned certifies that counsel for Non-party ADS, Inc. (“ADS”) notified counsel for the Respondents via email on or about September 24, 2018, and counsel for the Federal Trade Commission on September 25, 2018 that it would be seeking *in camera* treatment of the Confidential Documents. Counsel for the Federal Trade Commission has indicated that they would not object to ADS's motion. As of the filing of the above motion, position of counsel for the Respondents is not known.

Dated: September 25, 2018



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Counsel for non-party,
The Atlanta Dental Supply Company.

EXHIBIT A



Western Regional Office

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

September 17, 2018

VIA EMAIL TRANSMISSION

Atlanta Dental Supply
c/o John C. Williams
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Williams Law Building
1612 Northeast Expressway
Atlanta, GA 30329
jwilliams@williamsandwilliams.com

RE: *In the Matter of Benco Dental Inc., et al., Docket No. 9379*

Dear Mr. Williams:

By this letter we are providing formal notice, pursuant to Rule 3.45(b) of the Commission's Rules of Practice, 16 C.F.R. § 3.45(b), that Complaint Counsel intends to offer the documents referenced in the enclosed Attachment A into evidence in the administrative trial in the above-captioned matter. For your convenience, a copy of the documents will be sent to you in a separate email with an FTP link.

The administrative trial is scheduled to begin on October 16, 2018. All exhibits admitted into evidence become part of the public record unless Administrative Law Judge D. Michael Chappell grants *in camera* (i.e., non-public/confidential) status.

For documents that include sensitive or confidential information that you do not want on the public record, you must file a motion seeking *in camera* status or other confidentiality protections pursuant to 16 C.F.R §§ 3.45 and 4.10(g). Judge Chappell may order that materials, whether admitted or rejected as evidence, be placed *in camera* only after finding that their public disclosure will likely result in a clearly-defined, serious injury to the person, partnership, or corporation requesting *in camera* treatment.

Motions for *in camera* treatment for evidence to be introduced at trial must meet the strict standards set forth in 16 C.F.R. § 3.45 and explained in *In re 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re Jerk, LLC*, 2015 FTC LEXIS 39 (Feb. 23, 2015) and *In re Basic Research, Inc.*, 2006 FTC LEXIS 14 (Jan. 25, 2006). Motions also must be supported by a declaration or affidavit by a person qualified to explain the confidential nature of the material. *In re 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re North Texas Specialty Physicians*, 2004 FTC LEXIS 66 (Apr. 23, 2004). For your convenience, we included, as links in the cover email, an example of a third-party motion (and the accompanying declaration or affidavit) for *in camera* treatment that was filed and granted in an FTC administrative

proceeding. If you choose to move for *in camera* treatment, you must provide a copy of the document(s) for which you seek such treatment to the Administrative Law Judge. Also, you or your representative will need to file a Notice of Appearance in the administrative proceeding. For more information regarding filing documents in adjudicative proceedings, please see <https://www.ftc.gov/faq/ftc-info/file-documents-adjudicative-proceedings>.

Please be aware that under the current Scheduling Order **the deadline for filing motions seeking *in camera* treatment is September 26, 2018**. A copy of the March 14, 2018 Scheduling Order can be found at <https://www.ftc.gov/enforcement/cases-proceedings/151-0190/bencoscheinpatterson-matter>.

Additionally, in lieu of a deposition on the admissibility of the documents listed in Attachment A, we ask that you sign and return the attached declaration regarding the admissibility of these documents. Please return the signed declaration to my attention by September 28, 2018.

If you have any questions, please feel free to contact me at 415-848-5174.

Sincerely,



John P. Wiegand
Counsel Supporting the Complaint

Attachment

Attachment A

Exhibit No.	Full Name	Date	BegBates	EndBates
CX4129	Letter from: John Williams to: Devon Allen subject: ["Atlanta Dental's Production of Documents and Data Pursuant to FTC Subpoena"]	5/24/2018	FTC-ADS-000167	FTC-ADS-000176
CX4442	Data Dictionary.xlsx FTC-Data_2009.xlsx FTC-Data_2010.xlsx FTC-Data_2011.xlsx FTC-Data_2012.xlsx FTC-Data_2013.xlsx FTC-Data_2014.xlsx FTC-Data_2015.xlsx FTC-Data_2016.xlsx FTC-Data_2017.xlsx		CX4442-001	CX4442-001

EXHIBIT B

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

In the Matter of)	
)	
BENCO DENTAL SUPPLY CO.,)	
a corporation,)	PUBLIC
)	
HENTRY SCHEIN, INC.)	DOCKET NO. 9379
a corporation, and)	
)	
PATTERSON COMPANIES, INC.,)	
a corporation)	
)	
Respondents)	
)	

**DECLARATION OF TOM RICHARDSON IN SUPPORT OF NON-PARTY THE
ATLANTA DENTAL SUPPLY COMPANY 'S MOTION FOR IN CAMERA
TREATMENT**

I, Tom Richardson, hereby declare as follows:

1. I am the President of The Atlanta Dental Supply Company. (“ADS”). I make this declaration in support of Non-Party ADS's Motion for In Camera Treatment (the “Motion”). I have personal knowledge of the matters stated herein and, if called upon to do so, could competently testify about them.
2. I have reviewed and am familiar with the documents ADS produced in the above-captioned matter in response to a subpoena from the Federal Trade Commission. Given my position at ADS, I am familiar with the type of information contained in the documents at issue and its competitive significance to ADS. Based on my review of the documents, my knowledge of ADS's business, and my familiarity with the confidentiality protection afforded this type

of information by ADS, I submit that the disclosure of these documents to the public and to competitors of ADS would cause serious competitive injury to ADS.

3. ADS is a seller of dental supply products and equipment. Its customers, pricing, sales volume discounting is proprietary, sensitive and confidential. ADS has provided the confidential documents under a Protective Order with the firm understanding that only particularly positioned attorneys and experts would be allowed access for review of the subpoenaed documents. The respondents in this case are competitors of ADS and much larger competitors in the industry. Those respondents likewise protect its confidential documents including sales data. Keeping information such as the subpoenaed documents herein are critical to ADS's business competitiveness and strategies of a comparatively smaller dental supply company.

4. The FTC has informed ADS that it intends to use all the documents that ADS produced in response to a subpoena at the administrative hearing in this matter. Of these documents, Exhibit No. CX4442 (sales data) and contain confidential business information. As described in the Motion, ADS seeks permanent *in camera* protection of the following documents:

Exhibit No.	Full Name	Date	BegBates	EndBates
CX4129	Letter from:John Williams to: Devon Allen subject: ["Atlanta Dental's Production of Documents and Data Pursuant to FTC Subpoena"	5/24/2018	FTC-ADS-000167	FTC-ADS-000176
CX4442	Data Dictionary.xlsx FTC-Data_2009.xlsx FTC-Data_2010.xlsx FTC-Data_2011.xlsx FTC-Data_2012.xlsx FTC-Data_2013.xlsx FTC-Data_2014.xlsx FTC-Data_2015.xlsx FTC-Data_2016.xlsx FTC-Data_2017.xlsx		CX4442-001	CX4442-001

5. Exhibit no CX4442 is a compilation of sales of ADS for the years 2009-2017. ADS keeps its sales data in strict confidence because it would be harmful to ADS's ability to suitably priced and discounted its products to its customers if its information, including customer lists and pricing becomes known to its competitors or otherwise placed out in the public domain. Thus, disclosure of ADS's information, which up to now has been protected, would harm ADS's ability to compete with other dental product dealers.
6. ADS attempts to keep its pricing competitive in a highly competitive industry. Similarly, its competitors keep sales data confidential and unknown to ADS. Thus, disclosure of its sales data would harm ADS's ability to compete by making its proprietary information public.

I declare under penalty of perjury that the foregoing is true and correct. Executed September 24, 2018 in Duluth, Georgia.



Tom Richardson

EXHIBIT C

Hearing Exhibits Nos. CX4129 and CX4422

**MARKED CONFIDENTIAL
REDACTION IN THEIR ENTIRETY
REQUESTED**

CERTIFICATE OF SERVICE

I hereby certify that I delivered via FedEx and electronic mail a copy of the foregoing documents to:

Donald S. Clark
Office of the Secretary
Federal Trade Commission
600 Pennsylvania Ave., N.W., Room H-172
Washington, D.C. 20580
electronicfilings@ftc.gov

D. Michael Chappell
Chief Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave., N.W. Room H-106
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oalj@ftc.gov

I further certify that I delivered via electronic mail a copy of the foregoing document to:

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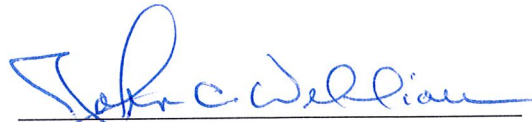
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Dated: September 25, 2018



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

In the Matter of)	
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BENCO DENTAL SUPPLY CO.,)	
a corporation,)	PUBLIC
)	
HENTRY SCHEIN, INC.)	DOCKET NO. 9379
a corporation, and)	
)	
PATTERSON COMPANIES, INC.,)	
a corporation)	
)	
Respondents)	

[PROPOSED] ORDER

Upon consideration of Non-Party Atlanta Dental Supply Company (“ADS’s”) Motion for In Camera Treatment, it is HEREBY ORDERED that the following documents are to be provided permanent in camera treatment from the date of this Order in their entirety,

Exhibit No.	Full Name	Date	BegBates	EndBates
CX4129	Letter from: John Williams to: Devon Allen subject: ["Atlanta Dental's Production of Documents and Data Pursuant to FTC Subpoena"]	5/24/2018	FTC-ADS-000167	FTC-ADS-000176
CX4442	Data Dictionary.xlsx FTC-Data_2009.xlsx FTC-Data_2010.xlsx FTC-Data_2011.xlsx FTC-Data_2012.xlsx FTC-Data_2013.xlsx FTC-Data_2014.xlsx FTC-Data_2015.xlsx FTC-Data_2016.xlsx FTC-Data_2017.xlsx		CX4442-001	CX4442-001

ORDERED:

D. Michael Chappell Chief Administrative Law
Judge

Date: _____

Notice of Electronic Service

I hereby certify that on September 25, 2018, I filed an electronic copy of the foregoing Non-Party The Atlanta Dental Supply Company's Motion for In Camera Treatment , with:

D. Michael Chappell
Chief Administrative Law Judge
600 Pennsylvania Ave., NW
Suite 110
Washington, DC, 20580

Donald Clark
600 Pennsylvania Ave., NW
Suite 172
Washington, DC, 20580

I hereby certify that on September 25, 2018, I served via E-Service an electronic copy of the foregoing Non-Party The Atlanta Dental Supply Company's Motion for In Camera Treatment , upon:

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