

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



In the Matter of,

Benco Dental Supply Co.,
a corporation,

Henry Schein, Inc.,
a corporation, and

Patterson Companies, Inc.,
a corporation.

Respondents.

Docket No. 9379

**NON-PARTY MID-ATLANTIC DENTAL PARTNERS' MOTION FOR *IN CAMERA*
TREATMENT**

I. INTRODUCTION

Pursuant to Rule 3.45 of the Federal Trade Commission's Rules of Practice, 16 C.F.R. § 3.45, Non-Party Mid-Atlantic Dental Partners ("Mid-Atlantic") respectfully moves this Court to grant indefinite *in camera* treatment of nine (9) documents, described more fully herein, which constitute competitively-sensitive, confidential business documents ("the Confidential Documents") and the deposition transcript of C. Mitchell Goldman, Chief Executive Officer of Mid-Atlantic ("the Deposition Transcript"), which similarly discussed competitively-sensitive and confidential business information.

Mid-Atlantic is not a party to this case and has sought to cooperate to the best of its ability with various requirements in this case. Mid-Atlantic first became aware of this case when Respondent Henry Schein, Inc. ("Schein") added Mid-Atlantic to its witness list. The Federal Trade Commission ("FTC") later issued a Subpeona Duces Tecum and Subpoena Ad Testificandum to Mid-Atlantic. Mid-Atlantic responded to the Subpoena Duces Tecum with a

production of documents, all marked “Confidential,” on July 20, 2018. Mr. Goldman sat for a deposition on August 15, 2018. The FTC notified Mid-Atlantic on September 17, 2018, that it intended to offer several Confidential Documents into evidence in this case. (See Sept. 17, 2018 Ltr. from FTC, attached as Exhibit A.) Respondent Schein notified Mid-Atlantic on September 17, 2018, that it intended to offer one of the same Confidential Documents identified by the FTC and the Deposition Transcript into evidence in this case. (See Sept. 17, 2018 Ltr. from Respondent Schein, attached as Exhibit B.)¹

Mid-Atlantic is seeking permanent *in camera* treatment for the Confidential Documents and the Deposition Transcript. These Confidential Documents are highly sensitive business documents, and adding the Confidential Documents to the public record will cause significant competitive harm to Mid-Atlantic. Similarly, the Deposition Transcript contains detailed testimony by Mr. Goldman on the history, structure, operations, and business strategy of Mid-Atlantic, and adding the Deposition Transcript to the public record will similarly cause significant harm to Mid-Atlantic in its ability to compete. In support of this Motion, Mid-Atlantic relies on the Declaration of C. Mitchell Goldman (“the Goldman Declaration”), attached as Exhibit C, which provides additional details on the documents for which Mid-Atlantic is seeking *in camera* treatment.

II. THE DOCUMENTS FOR WHICH PROTECTION IS SOUGHT

Mid-Atlantic seeks *in camera* treatment for the following Confidential Documents and Deposition Transcript, copies of which are attached as Exhibit D:

¹ As described more fully in the attached Statement Regarding Meet and Confer, the FTC and counsel for Respondents have all indicated that they would not oppose a Motion for *In Camera* Treatment filed by Mid-Atlantic.

Exhibit No. ²	Document Description	Date	Beginning Bates No.	Ending Bates No.
CX 4131	REDACTED	5/21/18	MADP-0000325	MADP-0000336
CX 4132	REDACTED	5/21/18	MADP 0000503	MADP-0000528
CX 4135	REDACTED	1/30/18	MADP-0000119	MADP-0000120
CX 4136	REDACTED	1/24/18	MADP-0000123	MADP-0000124
CX 4138	REDACTED	5/19/17	MADP-0000160	MADP-0000194
CX 4140/ RX 2769 ³	REDACTED	2/16/17	MADP-0000253	MADP-0000263
CX 4141	REDACTED	7/17/18	MADP-0000849	MADP-0000849
CX 4142	REDACTED	2/16/17	MADP-0000875	MADP-0000884

² Most of the Confidential Documents that are the subject of this Motion were identified by the FTC. This chart therefore uses the FTC's exhibit number, except as noted below.

³ This Confidential Document was identified by both the FTC and Respondent Schein, and the Exhibit Numbers for both the FTC and Respondent Schein are listed here.

CX 4143	REDACTED		MADP-0000885	MADP-0000885
N/A	Deposition Transcript of C. Mitchell Goldman ⁴	8/15/18	N/A	N/A

III. LEGAL STANDARD

“There can be no question that the confidential records of businesses involved in Commission proceedings should be protected insofar as possible.” *In re H.P. Hood & Sons, Inc.*, 1961 WL 65882, at *2 (F.T.C. March 14, 1961). This Court may grant *in camera* treatment of the Confidential Documents and Deposition Transcript upon finding that public disclosure of the documents “will likely result in a clearly defined, serious injury to the person, partnership, or corporation requesting in camera treatment or after finding that the material constitutes sensitive personal information.” 16 C.F.R. § 3.45(b). Mid-Atlantic bears the burden of showing the information is sufficiently secret and material to the business that disclosure would result in serious competitive injury. *In the Matter of 1-800 Contacts, Inc.*, 2017 WL 1345290, at *1 (F.T.C. april 4, 2017). In addition, since Mid-Atlantic is seeking indefinite *in camera* treatment, it must demonstrate that the correct circumstances exist here, namely that the need for confidentiality will not decrease over time. 16 C.F.R. § 3.45(b)(3). “[T]he courts have generally attempted to protect confidential business information from unnecessary airing.” *In re H.P. Hood & Sons, Inc.*, 1961 WL 65882, at *4.

Third party status is also relevant to determining whether *in camera* treatment is warranted. In extending the time for *in camera* treat of certain documents, one court noted that requests of “third party bystanders” deserve “special solicitude.” *In the Matter of Kaiser Alum. & Chem.*

⁴ The Deposition Transcript was identified by Respondent Schein.

Corp., 1984 WL 565325, at *1 (F.T.C. May 25, 1984) This should be especially true when “[a] public understanding of [a] proceeding does not depend on access to . . . data submitted by . . . third party firms.” *Id.*

IV. ARGUMENT

The Court should grant this Motion for three reasons. First, each of the Confidential Documents and Deposition Transcript contain secret information which is material to Mid-Atlantic, and release of which will result in a serious competitive injury to Mid-Atlantic. Second, Mid-Atlantic’s status as a third party should militate in favor of its motion. Third, indefinite *in camera* treatment is warranted since the need for confidentiality is not likely to decrease over time.

First, the Court should grant this Motion because each of the Confidential Documents and Deposition Testimony contain secret information that is material to Mid-Atlantic and serious competitive injury will result if the information is released. As described below, and as described in the Goldman Declaration, the Confidential Documents and Deposition Transcript meet this standard and therefore warrant *in camera* treatment.

- CX 4131 and CX 4132 are **REDACTED**, respectively. These documents are secret and material because they are part of the corporate structure of Mid-Atlantic, are kept confidential, are developed in consultation with counsel, and release of the documents would result in serious competitive injury by exposing details about Mid-Atlantic’s corporate structure and exposing details about Mid-Atlantic’s relationships with dental practices and dentists, which are central to Mid-Atlantic’s business. (See Goldman Decl. at ¶ 6.)
- CX 4135 and CX 4136 are emails between employees of Mid-Atlantic and Respondent Schein, discussing different aspects of the business relationship between Mid-Atlantic and

Respondent Schein. These documents are secret and material because they are private email communications involving some senior executives from Mid-Atlantic who manage supplier relationships, and release of the documents would result in serious competitive injury by exposing details about Mid-Atlantic's relationship with Respondent Schein in the form of private email communications. (*See* Goldman Decl. at ¶ 7.)

- CX 4138 is an email from REDACTED attaching an investor presentation titled REDACTED REDACTED prepared by Mid-Atlantic. This document is secret and material, was originally marked as "confidential" and "proprietary work product," resources were expended in its creation, Mid-Atlantic has agreed to maintain the confidentiality of this material for its investors, and release of the document would result in serious competitive injury by exposing detailed information about design, planning, and analysis related to Mid-Atlantic and intended for investors. (*See* Goldman Decl. at ¶ 8.)
- CX 4140/RX 2769 is an email chain between REDACTED forwarding an email from REDACTED to REDACTED and attaching a letter and Primary Vendor Agreement. This document is secret and material because it contains information about the business relationship between Mid-Atlantic and Respondent Schein, and release of this information would result in serious competitive injury by exposing the governing documents between Mid-Atlantic and Respondent Schein as well as detailed information on their relationship. (*See* Goldman Decl. at ¶ 9.)
- CX 4141 is a List of Affiliations dated July 17, 2018, prepared by C. Mitchell Goldman in response to the Subpoena Duces Tecum issued by the FTC. This document is secret and material because it contains details on Mid-Atlantic's affiliations, and release of this

information would result in serious competitive injury by exposing the same. (*See* Goldman Decl. at ¶ 10.)

- CX 4142 is a letter from REDACTED and a signed Primary Vendor Agreement between Mid-Atlantic and Respondent Schein. This document is secret and material as it is the document governing the relationship between Mid-Atlantic and Respondent Schein, and release of this information would result in serious competitive injury by exposing the governing documents between Mid-Atlantic and Respondent Schein and exposing detailed information about their relationship. (*See* Goldman Decl. at ¶ 11.)
- CX 4143 is a chart prepared by C. Mitchell Goldman for use in his deposition. This document is secret and material as it explains the corporate structure of Mid-Atlantic, Mid-Atlantic worked with counsel and expended resources to develop its corporate structure, Mr. Goldman personally worked to create this chart for use in the deposition, and release of this chart would result in serious competitive injury by exposing a concise example of Mid-Atlantic's corporate structure. (*See* Goldman Decl. at ¶ 12.)
- Finally, the Deposition Transcript is secret and material because Mr. Goldman discussed confidential business information about Mid-Atlantic, including but not limited to the history, structure, operations, and business strategy of Mid-Atlantic, and release of the transcript would result in serious competitive injury by exposing detailed discussion about Mid-Atlantic's business by its CEO. (*See* Goldman Decl. at ¶ 13.)

All of the Confidential Documents and the Deposition Transcript are secret and material, and their release would cause serious competitive injury to Mid-Atlantic. The Court should therefore grant this Motion.

Second, the Court should grant this Motion because of Mid-Atlantic's status as a third party. The very policy reasons articulated by one Court in extending *in camera* treatment for third party documents are present here. *In the Matter of Kaiser Alum. & Chem. Corp.*, 1984 WL 565325, at *1 (F.T.C.) ("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."). Mid-Atlantic cooperated with the requests in this case. Moreover, any public understanding of this proceeding will not be enhanced by access to the Confidential Documents or Deposition Testimony. *Id.* Outside of the identification of Mid-Atlantic as a witness and the supplier relationship Mid-Atlantic has with Respondent Schein, Mid-Atlantic has nothing to do with this case. Thus, access to its Confidential Documents and Deposition Testimony is wholly unlikely to enhance an understanding of the case. Because Mid-Atlantic has both made the requisite showing, and has the special status of a third party, the Court should grant this Motion.

Third, indefinite *in camera* treatment is warranted here because the need for confidentiality is not likely to decrease over time. While the Confidential Documents vary, they all share the commonality of pertaining to highly sensitive information about a private company that has expended resources on its design, structure, business strategy, and relationships. The information broadly encompasses such topics as the corporate structure and design of Mid-Atlantic, private communications with Respondent Schein, and materials created for investors or for assistance in explanations necessary to respond to subpoenas. The information is and will remain sensitive and secret, and the passage of time will not cause that to change. Similarly, the Deposition Transcript contains detailed testimony by Mr. Goldman on Mid-Atlantic's corporate structure and design, and other aspects of the business which should stay confidential. Since the need for confidentiality is not likely to decrease over time, this information should be granted indefinite *in camera*

treatment. *See In the Matter of 1-800 Contacts, Inc.*, 2017 WL 1345290, at *6 (granting indefinite *in camera* treatment to Google for internal documents and deposition testimony).

V. CONCLUSION

For the reasons set forth above and in the accompanying Goldman Declaration, Mid-Atlantic respectfully requests that this Court grant permanent *in camera* treatment for the Confidential Documents and the Deposition Transcript in their entirety.

Dated: September 26, 2018

Respectfully submitted,

DLA PIPER LLP (US)

/s/ Lesli C. Esposito _____

Lesli C. Esposito

John K. Lisman

DLA Piper LLP (US)

One Liberty Place

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Philadelphia, PA 19103

Telephone: (215) 656-3300

Facsimile: (215) 656-3301

lesli.esposito@dlapiper.com

john.lisman@dlapiper.com

STATEMENT REGARDING MEET AND CONFER

The undersigned certifies that counsel for non-party Mid-Atlantic Dental Partners (“Mid-Atlantic”) separately emailed counsel for the Federal Trade Commission (“FTC”) and Respondent Henry Schein, Inc. (“Schein”), on or about September 21, 2018, asking whether the FTC or Schein would oppose a motion by Mid-Atlantic seeking *in camera* treatment of the confidential documents identified by the FTC and Schein. Both counsel for the FTC and Schein indicated they would not oppose such a motion. Counsel for Schein further indicated that he emailed counsel for Respondents Benco Dental Supply Co., Inc., and Patterson Companies, Inc., who also stated they would not oppose such a motion.

Dated: September 26, 2018

/s/ John Lisman

Lesli Esposito
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Facsimile: (215) 656-3301
lesli.espostio@dlapiper.com
john.lisman@dlapiper.com

CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2018, I caused to be served the following documents and related exhibits on the parties listed below by the manner indicated:

The Office of the Secretary (non-public version via FTC E-Filing System)

Donald S. Clark
Secretary
Federal Trade Commission
600 Pennsylvania Avenue, N.W., Room H-113
Washington, DC 20580

The Office of the Administrative Law Judge (non-public version via electronic mail)

D. Michael Chappell
Chief Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Avenue, N.W., Room H-110
Washington, DC 20580
oalj@ftc.gov

Jessica S. Drake, Counsel Supporting the Complaint**Federal Trade Commission (non-public version via electronic mail)**

600 Pennsylvania Ave. NW
Washington, DC 20580
jdrake@ftc.gov

Counsel for Respondent Benco Dental Supply Co. (non-public version via electronic mail)

Kenneth Racowski
Buchanan Ingersoll & Rooney PC
50 S. 16th Street, Suite 3200
Philadelphia, PA 19102-2555
kenneth.racowski@bipc.com

Counsel for Respondent Henry Schein, Inc. (non-public version via electronic mail)

John P. McDonald
Lock Lorde LLP
2200 Ross Avenue, Suite 2800
Dallas, TX 75201
jpmcdonald@locklorde.com

Counsel for Respondent Patterson Companies, Inc. (non-public version via electronic mail)

William Lavery
Baker Botts LLP
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Washington, DC 20004
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/s/ John Lisman

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EXHIBIT A



Western Regional Office

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

WASHINGTON, D.C. 20580

September 17, 2018

VIA EMAIL TRANSMISSION

Mid-Atlantic Dental Partners
c/o Lesli C. Esposito, Esq.
DLA Piper
One Liberty Place
1650 Market Street, Suite 4900
Philadelphia, Pennsylvania 19103-7300
lesli.esposito@dlapiper.com

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

Dear Ms. Esposito:

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

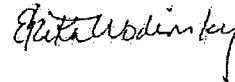
proceeding. If you choose to move for *in camera* treatment, you must provide a copy of the document(s) for which you seek such treatment to the Administrative Law Judge. Also, you or your representative will need to file a Notice of Appearance in the administrative proceeding. For more information regarding 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 415-848-5190.

Sincerely,



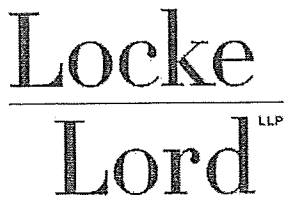
Erika Wodinsky
Counsel Supporting the Complaint

Attachment

Attachment A

Exhibit No.	Full Name	Date	BegBates	EndBates
CX4131	REDACTED	5/21/2018	MADP-0000325	MADP-0000336
CX4132		5/21/2018	MADP-0000503	MADP-0000528
CX4135		1/30/2018	MADP-0000119	MADP-0000120
CX4136		1/24/2018	MADP-0000123	MADP-0000124
CX4138		5/19/2017	MADP-0000160	MADP-0000194
CX4140		2/16/2017	MADP-0000253	MADP-0000263
CX4141		7/17/2018	MADP-0000849	MADP-0000849
CX4142		2/16/2017	MADP-0000875	MADP-0000884
CX4143		TBD	MADP-0000885	MADP-0000885

EXHIBIT B



Attorneys & Counselors

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September 17, 2018

VIA E-MAIL & FED-EX

Mid-Atlantic Dental Service Holdings LLC
c/o Lesli Esposito
DLA Piper
One Liberty Place
1650 Market Street
Philadelphia, Pennsylvania 19103

Re: *In the Matter of Benco Dental Supply Co, Henry Schein, Inc. and Patterson Companies, Inc.* (FTC Docket No. 9379)

Dear Ms. Esposito,

By this letter, we are providing formal notice, pursuant to Rule 3.45(b) of the Federal Trade Commission's Rules of Practice, 16 C.F.R. § 3.45(b), that Benco Dental Supply Company, Henry Schein, Inc., and Patterson Companies, Inc. intend to offer the documents and/or testimony referenced in the enclosed Attachment A into evidence in the administrative trial in the above-captioned matter. The administrative trial is scheduled to begin on October 16, 2018. All exhibits admitted into evidence become part of the public record unless *in camera* status is granted by Administrative Law Judge D. Michael Chappell.

For documents or testimony which 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, 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 (Feb. 23, 2015); *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 documents. *In re 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re North Texas Specialty Physicians*, 2004 FTC LEXIS 66 (April 23, 2004). Each party or non-party that files a motion for

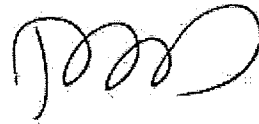
September 17, 2018
Page 2

in camera treatment shall provide one copy of the documents for which in camera treatment is sought to the Administrative Law Judge. For your convenience, a copy of the documents and testimony will be provided to you via secure file share.

Please be aware that under the current Scheduling Order of March 14, 2018, the deadline for filing motions seeking *in camera* status is September 26, 2018. A copy of the Scheduling Order can be found at:
<https://www.ftc.gov/system/files/documents/cases/d09379order590015.pdf>.

If you have any questions, please feel free to contact me at (214) 740-8758.

Sincerely,

A handwritten signature in black ink, appearing to read 'JPMcDonald', written in a cursive style.

John P. McDonald

September 17, 2018
Page 3

**Mid-Atlantic Dental
Attachment A**

RX Number	Description	Date	Beg Bates	End Bates
RX2769	REDACTED	2/16/2017	MADP-0000253	MADP-0000263
RX2953	Mitchell Goldman Deposition Transcript	8/15/2018	NA	NA

EXHIBIT C

Declaration of C. Mitchell Goldman

**Marked In Camera
Redaction in its Entirety Requested**

EXHIBIT D

**Trial Exhibits CX4131, CX4132,
CX4135, CX4136, CX4138, CX4140 /
RX2729, CX4141, CX4142, CX4143
and 08-15-18 Deposition of C. Mitchell
Goldman**

**Marked In Camera
Redaction in their Entirety Requested**

Notice of Electronic Service

I hereby certify that on September 27, 2018, I filed an electronic copy of the foregoing Non-Party Mid-Atlantic Dental Partners' 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 27, 2018, I served via E-Service an electronic copy of the foregoing Non-Party Mid-Atlantic Dental Partners' Motion for In Camera Treatment, upon:

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Federal Trade Commission
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Complaint

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Respondent

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