

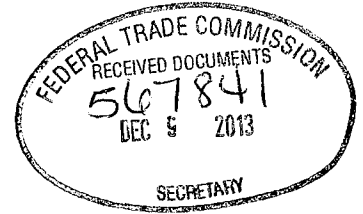
UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES

ORIGINAL

_____)
In the Matter of)
)
ARDAGH GROUP S.A.)
a public limited liability company, and)
)
SAINT-GOBAIN CONTAINERS, INC,)
a corporation, and)
)
COMPAGNIE DE SAINT-GOBAIN,)
a corporation.)
_____)

PUBLIC

DOCKET NO. 9356



MOTION BY BACARDI USA, INC. FOR *IN CAMERA* TREATMENT OF CERTAIN DOCUMENTS AND INFORMATION

Pursuant to Rule 3.45 of the Federal Trade Commission's Rules of Practice, 16 C.F.R. § 3.45(b), non-party Bacardi USA, Inc. ("BUSA") respectfully submits this motion for *in camera* treatment of its competitively-sensitive, confidential business documents and information. The documents and testimony (collectively, "information") were provided in response to a third-party subpoena in this matter, and the parties have notified BUSA that they may be introduced into evidence at the administrative trial in the above-captioned matter. *See* Letter from the Federal Trade Commission ("FTC") dated November 19, 2013 and Letter from Mark Lanpher dated November 26, 2013 (attached as Exhibit A).

All of the information for which BUSA is seeking *in camera* treatment is confidential. BUSA would be seriously harmed in its ability to compete if this information were to become part of the public record. For the reasons discussed in this motion, BUSA requests that this Court afford its confidential information *in camera* treatment for a period of 4 years. This motion is supported by the declaration of Mr. Roberto del Rosal Fanjul, attached as Exhibit B,

which provides additional details on the information for which BUSA is seeking *in camera* treatment.

I. The Information for which Protection is Sought

BUSA seeks *in camera* treatment for the following information, copies of which are attached as Exhibit C.

| Exhibit No. | Date | Document Title | Beginning Bates | End Bates |
|--------------------|-------------|--|------------------------|------------------|
| PX4829 | N/A | Bacardi Spreadsheet: Bacardi Brand FY-13 sales in physical cases | BIC-FTC-0000002 | BIC-FTC-0000002 |
| PX4830 | N/A | Bacardi Spreadsheet: Bacardi Brand Glass and PET FY-13 sales in physical cases | BIC-FTC-0000003 | BIC-FTC-0000003 |
| PX6073 | 11/7/13 | RESERVED for Designated Deposition Transcript of Mr. Shane Graber (Bacardi) | N/A | N/A |

II. BUSA’s Information is Secret and Material Such That Disclosure Would Result in Serious Injury

Information is entitled to *in camera* treatment when its “public disclosure will likely result in a clearly defined, serious injury to the . . . corporation requesting” such treatment. 16 C.F.R. § 3.45(b). The proponent of *in camera* treatment demonstrates serious injury by showing that the documents are (i) secret and (ii) material to the business. *In re General Foods Corp.*, 95 F.T.C. 352, Dkt. No. 9085, 1980 WL 338997, at *3 (Mar. 10, 1980); *In re Bristol-Myers Co.*, 90 F.T.C. 455, Dkt. Nos. 8917, 8918, & 8919, 1977 WL 189054, at *2 (Nov. 11, 1977). Courts weigh six factors when determining secrecy and materiality: (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.*, 1977 WL 189054, at *2 (citing Restatement of Torts § 757, Comment b at 6 (1939)). These factors may be “inferred from the nature of the documents themselves.” *H.P. Hood & Sons, Inc.*, 58 F.T.C. 1184, Dkt. No. 7709, 1961 WL 65882, at *4 (Mar. 14, 1961).

The BUSA information at issue is both secret and material to BUSA’s business. The information contains competitively significant data, such as the 2013 sales of specific BUSA products and internal sales and packaging strategies. Such information is not widely known to BUSA’s competitors or the general public. When the information was provided to the FTC, BUSA took steps to maintain its confidentiality by designating the documents “confidential,” as defined by the Protective Order in this matter. The information is also material to BUSA’s business because it is directly related to BUSA’s sales and manufacturing strategies. Because of the confidential nature of the information and its materiality to BUSA’s business, *in camera* treatment is appropriate.

Disclosure of the information to BUSA’s competitors would likely result in the loss of a business advantage. See *In re Dura Lube Corp.*, Dkt. No. 9292, 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.’”) (citing *In re General Foods Corp.*, 1980 WL 338997, at *3). The information reflects specific sales data and strategic marketing and sales processes for specific products. Making such information public could result in a loss of any business advantage BUSA has with respect to these specific products.

BUSA’s status as a third-party is also 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*, 1961

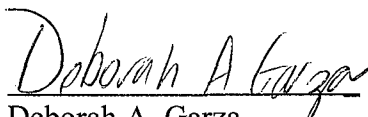
WL 65882, at *2. This is especially true in the case of a third-party, which deserves “special solicitude” in its request for *in camera* treatment for its confidential business information. *See In re Kaiser Aluminum & Chem. Corp.*, 103 F.T.C. 500, 500 (1984) (“As a policy matter, extensions of confidential or *in camera* treatment in appropriate cases involving third party bystanders encourages cooperation with future adjudicative discovery requests.”). BUSA’s third-party status therefore weighs in favor of granting *in camera* status to its documents.

Should the Court decline to grant BUSA’s motion, the contact of the person to be noticed that such information will become part of the public record is Mr. Charlie Dobal at 2701 LeJeune Road, Coral Gables, Florida, 33134.

III. Conclusion

For the reasons set forth above and in the declaration of Mr. Roberto del Rosal Fanjul, BUSA respectfully requests that this Court grant *in camera* treatment for a period of 4 years for the documents identified herein.

Respectfully Submitted,



Deborah A. Garza
Chinue Turner Richardson

COVINGTON & BURLING LLP
1201 Pennsylvania Ave. NW
Washington, DC 20004-2401
Telephone: 202.662.5146
Facsimile: 202.778.5146
dgarza@cov.com
crichardson@cov.com

Counsel for BUSA

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION**

| | | |
|---|---|-----------------|
| In the Matter of |) | |
| |) | PUBLIC |
| ARDAGH GROUP S.A. |) | |
| a public limited liability company, and |) | |
| |) | DOCKET NO. 9356 |
| SAINT-GOBAIN CONTAINERS, INC, |) | |
| a corporation, and |) | |
| |) | |
| COMPAGNIE DE SAINT-GOBAIN, |) | |
| a corporation. |) | |

**[DRAFT PROPOSED ORDER] GRANTING MOTION FOR *IN CAMERA*
TREATMENT OF CERTAIN TRIAL EXHIBITS**

On December 9, 2013, BUSA moved this Court for *in camera* treatment of certain exhibits. Having reviewed BUSA's motion and considered the reasons for this motion, the motion is GRANTED.

ORDERED

Dated:

Honorable D. Michael Chappell
Administrative Law Judge

STATEMENT OF PARTIES REGARDING MEET AND CONFER

On December 6, 2013, BUSA's Counsel conferred with the parties regarding the information for which BUSA is seeking *in camera* treatment. Counsel for the Respondents indicated that they were taking no position on the motion. As of the time of this filing, Complaint Counsel had not indicated whether they would be taking a position on the motion.

Respectfully Submitted,



Deborah A. Garza
Chinue Turner Richardson

COVINGTON & BURLING LLP
1201 Pennsylvania Ave. NW
Washington, DC 20004-2401
Telephone: 202.662.5146
Facsimile: 202.778.5146
dgarza@cov.com
crichardson@cov.com

Counsel for BUSA

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION**

| | | |
|---|---|-----------------|
| In the Matter of |) | |
| |) | PUBLIC |
| ARDAGH GROUP S.A. |) | |
| a public limited liability company, and |) | |
| |) | DOCKET NO. 9356 |
| SAINT-GOBAIN CONTAINERS, INC, |) | |
| a corporation, and |) | |
| |) | |
| COMPAGNIE DE SAINT-GOBAIN, |) | |
| a corporation. |) | |

CERTIFICATE OF SERVICE

We hereby certify that this is a true and correct copy of BUSA's *MOTION FOR IN CAMERA TREATMENT*, and that on this 9th day of December, 2013, we caused the foregoing to be served by hand delivery, overnight mail and/or e-mail on the following:

The Honorable D. Michael Chappell
Chief Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Avenue, NW
H-113
Washington, DC 20580

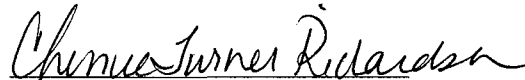
Donald S. Clark
The Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW
H-135
Washington, DC 20580

Michael Franchak, Esq.,
Federal Trade Commission
601 New Jersey Ave NW
Mail Drop NJ-6120
Washington DC 20001
Counsel for the FTC

Dale Collins, Esq., and Richard Schwed
Shearman & Sterling LLP

599 Lexington Avenue
New York, NY 10022
Counsel for Defendant Ardagh

Christine A. Varney, Esq.
Cravath, Swaine & Moore LLP.
825 Eight Avenue
Worldwide Plaza, New York, NY 10019
*Counsel for Defendant Compagnie de Saint-Gobain and Saint-Gobain-Containers,
Inc.,*



Deborah A. Garza
Chinue Turner Richardson

COVINGTON & BURLING LLP
1201 Pennsylvania Ave. NW
Washington, DC 20004-2401
Telephone: 202.662.5146
Facsimile: 202.778.5146
dgarza@cov.com
crichardson@cov.com

Counsel for BUSA

Dated: December 9, 2013

Exhibit A



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

BUREAU OF COMPETITION
MERGERS II DIVISION

November 19, 2013

Michael Franchak
Bureau of Competition
Federal Trade Commission
601 New Jersey Ave, N.W.
Washington, DC 20001
(202) 326-3406
mfranchak@FTC.gov

Via Federal Express

Deborah A. Garza, Esq.
Covington & Burling LLP
1201 Pennsylvania Avenue, NW
Washington, DC 20004

RE: *In the Matter of Ardagh Group S.A., and Saint-Gobain Containers, Inc., and Compagnie de Saint Gobain*, Docket No. 9356

Dear Ms. Garza:

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 and testimony referenced in the enclosed Attachments A and B into evidence in the administrative trial in the above-captioned matter. Please note that the list of deposition designations in Attachment B does not include any of Complaint Counsel's counter-designations, if any, which are not due until November 25, 2013.

The administrative trial is scheduled to begin on December 19, 2013. All exhibits admitted into evidence become part of the public record unless Administrative Law Judge D. Michael Chappell grants *in camera* status.

For documents or testimony 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). Because counter-

designations are not yet due, this includes all passages of deposition testimony that warrant *in camera* treatment, whether or not Complaint Counsel has designated those passages. 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.

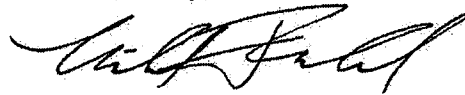
Motions for *in camera* treatment for evidence to be introduced at trial must meet the strict standards set forth in 16 C.F.R. § 3.45 and explained in *In re Dura Lube Corp.*, 1999 FTC LEXIS 255 (Dec. 23, 1999); *In re Hoechst Marion Roussel, Inc.*, 2000 FTC LEXIS 157 (Nov. 22, 2000); and *In re Basic 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 North Texas Specialty Physicians*, 2004 FTC LEXIS 66 (April 23, 2004).

Please be aware that under the current scheduling order, the deadline for filing motions seeking *in camera* status is November 26, 2013.

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 December 3, 2013, if possible, as a scanned .pdf attached to an e-mail.

If you have any questions, please feel free to contact me at (202) 326-3406.

Sincerely,



Michael Franchak
Counsel Supporting the Complaint

Attachments

ATTACHMENT A

| Exhibit Number | Date | BegBates | EndBates | Document Description |
|----------------|-----------|-----------------|-----------------|--|
| PX4829 | N/A | BIC-FTC-0000002 | BIC-FTC-0000002 | Bacardi Spreadsheet: Bacardi Brand FY-13 sales in physical cases |
| PX4830 | N/A | BIC-FTC-0000003 | BIC-FTC-0000003 | Bacardi Spreadsheet: Bacardi Brand Glass and PET FY-13 sales in physical cases |
| PX6073 | 11/7/2013 | N/A | N/A | RESERVED for Designated Deposition Transcript of Shane Graber (Bacardi) |

ATTACHMENT B

Name: Graber, Shane

Company: Bacardi USA

Date & Type: 11/7/2013 Deposition (PX6073)

4:11 - 16
5:10 - 6:3
6:18 - 8:9
8:25 - 11:14
12:3 - 9
12:14 - 23
13:5 - 14:8
15:2 - 11
16:2 - 17:11
17:12 - 18:11
19:4 - 24
20:6 - 17
21:8 - 14
21:17 - 22:12
22:21 - 24:3
24:9-25:22
26:10 - 22
27:12 - 28:2
28:10 - 22
29:20 - 30:11
30:19 - 31:8
33:9 - 22
34:2 - 35:9
37:16 - 38:5
38:14 - 24
40:8 - 41:4
41:9 - 22
43:12 - 45:8
45:12 - 25
46:19 - 47:2
48:17 - 50:23
51:9 - 14
52:1 - 53:15
63:12 - 64:1
64:8 - 23
66:2 - 67:2
67:12 - 21
69:14 - 71:24
77:17 - 78:3
90:16 - 91:24

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

In the Matter of

Ardagh Group S.A.,
a public limited liability company, and

Compagnie de Saint-Gobain, a corporation,
and

Saint-Gobain Containers, Inc.,
a corporation.

DOCKET NO. 9356

DECLARATION

I, _____, pursuant to 28 U.S.C. § 1746, make the following statement:

1. I am an employee of Bacardi Limited. I have personal knowledge of the facts set forth in this declaration, and if called as a witness I could and would testify competently under oath to such facts.
2. I have reviewed the documents referenced in Attachment A to this Declaration, which have been identified by Complaint Counsel with PX numbers for use as exhibits in the above-captioned matter.
3. I hereby certify that each document referenced in Attachment A herein: (a) was made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters; (b) was kept in the course of regularly

conducted activity; and (c) was made by the regularly conducted activity as a regular practice.

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

Executed on: _____

Name:

Title:

SHEARMAN & STERLING^{LLP}

801 PENNSYLVANIA AVENUE, NW | WASHINGTON, DC | 20004-2634

WWW.SHEARMAN.COM | T +1.202.508.8000 | F +1.202.508.8100

mark.lanpher@shearman.com
202.508.8120

November 26, 2013

CONFIDENTIAL
Via Email and U.S. Mail

Deborah A. Garza
Covington & Burling LLP
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Re: In the Matter of Ardagh Group S.A. et al., Docket No. 9356 (F.T.C.)

Dear Ms. Garza:

Pursuant to Paragraph 10 of the Protective Order in the above-referenced matter (enclosed), the Scheduling Order in the above-referenced matter, and 16 C.F.R. § 3.45 (enclosed), this letter is providing notice to Bacardi USA that Respondents Ardagh Group S.A., Compagnie de Saint-Gobain, and Saint-Gobain Containers plan to introduce confidential material produced by Bacardi USA into evidence at the Commission's hearing in the above-referenced matter, scheduled to commence on December 19, 2013.

Under the scheduling order in this case, yesterday the parties were required to identify any counter-designations of deposition testimony that they may seek to introduce during the hearing. Respondents have identified the following transcript excerpts of the oral deposition of Shane M. Graber, taken on November 7, 2013:

- Pages: 15:16-25, 38:25-39:3, 41:5-8, 45:9-11, 51:15-17, 51:19-25, 53:22-57:25, 58:2-6, 58:13-60:4, 60:15-61:1, 61:11-62:14, 65:5-66:1, 67:3-11, 67:22-69:13, 71:25-72:13, 75:4-8, 76:3-14, 76:16-77:6, 78:4-7, 78:12-14, 83:24-85:13, 85:15-16

A copy of Mr. Graber's deposition testimony is enclosed for reference.

Pursuant to the Scheduling Order, a party may file a motion for *in camera* treatment of its confidential material with the Administrative Law Judge by December 9, 2013. The strict

ABU DHABI | BEIJING | BRUSSELS | FRANKFURT | HONG KONG | LONDON | MILAN | NEW YORK | PALO ALTO
PARIS | ROME | SAN FRANCISCO | SÃO PAULO | SHANGHAI | SINGAPORE | TOKYO | TORONTO | WASHINGTON, DC

SHEARMAN & STERLING LLP IS A LIMITED LIABILITY PARTNERSHIP ORGANIZED IN THE UNITED STATES UNDER THE LAWS OF THE STATE OF DELAWARE, WHICH LAWS LIMIT THE PERSONAL LIABILITY OF PARTNERS.

November 26, 2013

standard for motions for *in camera* treatment of confidential material is set forth in 16 C.F.R. § 3.45, and is explained in *In re Dura Lube Corp.*, 1999 FTC LEXIS 255 (Dec. 23, 1999); *In re Hoechst Marion Roussel, Inc.*, 2000 FTC LEXIS 157 (Nov. 22, 2000) and 2000 FTC LEXIS 138 (Sept. 19, 2000); *In re Basic Research, Inc.*, 2006 FTC LEXIS 14 (Jan 25, 2006). Motions must be supported by a declaration or affidavit by a person qualified to explain the confidential nature of the documents. *In re North Texas Specialty Physicians*, 2004 FTC LEXIS 66 (April 23, 2004). Each party or non-party that files a motion for *in camera* treatment shall provide one copy of the documents for which *in camera* treatment is sought to the Administrative Law Judge.

If you have any questions, please feel free to contact me at 202.508.8120.

Best regards,

/s/ Mark Lanpher

Mark Lanpher

Enclosures

Exhibit B

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

| | | |
|---|---|-----------------|
| In the Matter of |) | |
| |) | PUBLIC |
| ARDAGH GROUP S.A. |) | |
| a public limited liability company, and |) | |
| SAINT-GOBAIN CONTAINERS, INC, |) | DOCKET NO. 9356 |
| a corporation, and |) | |
| COMPAGNIE DE SAINT-GOBAIN, |) | |
| a corporation. |) | |

DECLARATION OF ROBERTO DEL ROSAL FANJUL

I, Roberto del Rosal Fanjul, declare under penalty of perjury that the following is true and correct:

1. I currently serve as Senior Vice President, Chief Financial Officer of Bacardi USA, Inc. (“BUSA”). In this position, my responsibilities include overseeing all financial pricing, sales and marketing strategies and decisions.

2. I submit this declaration in support of BUSA’s Motion for *in camera* treatment of certain documents and testimony (collectively, “information”) that BUSA has been notified are potential exhibits at the administrative trial in this matter. BUSA produced this information pursuant to subpoena during discovery proceedings in the above-captioned matter.

3. I am familiar with the BUSA information that is the subject of BUSA’s motion and the level of confidentiality and materiality associated with the subject matter therein.

4. I have reviewed the exhibits appearing on Counsel’s list for the purpose of determining which proposed exhibits contain confidential and material information.

5. Attachment A, attached hereto, identifies information for which BUSA seeks *in camera* treatment.

6. Documents Reflecting Sales Information. Exhibits Nos. PX4829 and PX4830 contain detailed, sensitive and confidential sales information for several BUSA products. BUSA would suffer competitive injury if this information were to be made public and hence disclosed to competitors. This information has been maintained internally by BUSA in a confidential manner, only being shared with those individuals with a need to know. The information is not available to BUSA's competitors or to the general public. When legally compelled to produce the information under subpoena, the documents were treated as "confidential," in accordance with the Protective Order in this action.

7. This information is material and important to BUSA's business because it reflects specific sales volume for various products. This highly-sensitive, confidential information is vital to BUSA's competitive position in the marketplace. The public disclosure of this competitively sensitive information to competitors would be highly detrimental to BUSA, potentially resulting in significant and irreparable loss of business advantage to BUSA.


8. Deposition Testimony. The deposition transcript of Mr. Shane Graber reflects specific information about product pricing, sales, packaging and manufacturing. This sensitive information is highly confidential. BUSA has not publicly disclosed the information. BUSA's pricing, sales, and manufacturing strategies are vital to BUSA's competitive position, and BUSA has spent many years developing these strategies. BUSA's efforts in this regard have allowed it to gain a competitive advantage in the marketplace and better serve its customers. If disclosed to the public and to BUSA's competitors, it could cause serious, irreparable

competitive injury to BUSA. Competitors would gain an unfair advantage were they to know with certainty BUSA's internal pricing, packaging and manufacturing strategies.

9. In sum, the information for which BUSA seeks *in camera* review are sensitive and material to BUSA's business and competitiveness. Disclosure of the information contained in these documents would result in the loss of business advantage and significant irreparable harm to BUSA.

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

Executed in Coral Gables, FL on this 9th day of December, 2013.



Roberto del Rosal Fanjul

Attachment A

| Exhibit No. | Date | Document Title | Beginning Bates | End Bates |
|--------------------|-------------|---|------------------------|------------------|
| PX4829 | N/A | Bacardi Spreadsheet: Bacardi Brand FY-13 sales in physical cases (Column C) | BIC-FTC-0000002 | BIC-FTC-0000002 |
| PX4830 | N/A | Bacardi Spreadsheet: Bacardi Brand Glass and PET FY-13 sales in physical cases (Column F (Glass) and Column E (PET)) | BIC-FTC-0000003 | BIC-FTC-0000003 |
| PX6073 | 11/7/13 | <p>The following pages and lines of the Deposition Transcript of Mr. Shane Graber (Bacardi):</p> <p>8:10-23 15:19-17:11 17:17-18:3 18:12-21 22:23-23:11 23:21-24:3 24:15-25:22 27:18-23 28:6-29:19 31:9-32:1 36:16-37:3 39:19-24 41:5-19 42:7-13 44:1-45:11 47:19-48:6 48:25-51:8 52:5-53:15 57:4-12 62:19-63:1 64:11-20 65:19-66:1 66:7-68:16 69:19-72:6 74:6-21 76:5-24 81:10-17 83:24-84:15 84:20-23 87:10-88:5</p> | N/A | N/A |

Exhibit C

**Deposition Transcript of Mr. Shane Graber
Redacted in its Entirety**

| Brand | Size |
|----------------------|----------|
| Bacardi Rum Superior | 1.75L |
| | 1L |
| | 750ml |
| | 375ml |
| | 200ml |
| | 100ml |
| Bacardi Rum Gold | 1.75L |
| | 1L |
| | 750ml |
| | 375ml |
| | 200ml |
| | 100ml |
| Bacardi Select | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Rum 151 | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Limon | 1.75L |
| | 1L |
| | 750ml |
| | 375ml |
| | 200ml |
| Bacardi O | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Razz | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Big Apple | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Grand Melon | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Peach Red | 1.75_LTR |
| | 1_LTR |
| | 750_ML |

| Brand | Size |
|-------------------------------|----------|
| | 375_ML |
| | 200_ML |
| Bacardi Coco | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Dragon Berry | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Torched Cherry | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Rock Coconut | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Arctic Grape | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Black Razz | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Wolf Berry | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Pineapple Fusion | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Bacardi Cocktails Mojito | 1.75_LTR |
| | 750_ML |
| Bacardi Cocktails Raspberry | 1.75_LTR |
| | 750_ML |
| Bacardi Cocktails Pina Colada | 1.75_LTR |
| | 750_ML |
| Bacardi Cocktails Straw Daiq | 1.75_LTR |

| Brand | Size |
|------------------------------|----------|
| | 750_ML |
| Bacardi Cocktails Daiq Hand | 1.75_LTR |
| | 750_ML |
| BCC Light Mojito | 1.75_LTR |
| | 750_ML |
| BCC Light Pina Colada | 1.75_LTR |
| | 750_ML |
| BCC Light Straw Daiq | 1.75_LTR |
| | 750_ML |
| Bacardi 8 | 1_LTR |
| | 750_ML |
| Castillo Rum Spice | 1_LTR |
| | 750_ML |
| Castillo Rum Gold | 1_LTR |
| | 750_ML |
| Castillo Rum Silver | 1_LTR |
| | 750_ML |
| Bacardi Oak Heart Spiced Rum | 1.75_LTR |
| | 1_LTR |
| | 750_ML |
| | 375_ML |
| | 200_ML |
| Total Physical Cases | |

| Brand | Size |
|----------------------------------|----------|
| Bacardi Rum Superior | 1.75L |
| | 750ml |
| | 50_ML |
| Bacardi Rum Gold | 1.75L |
| | 750ml |
| | 50_ML |
| Bacardi Flavored Rum | 50_ML |
| Castillo Rum Spice | 1.75_LTR |
| | 750_ML |
| Castillo Rum Gold | 1.75_LTR |
| | 750_ML |
| Castillo Rum Silver | 1.75_LTR |
| | 750_ML |
| Bacardi Oak Heart Spiced Rum | 50ml |
| Bacardi Party Drinks | 1.75_LTR |
| | 750_ML |
| Total Physical Cases (Non-Glass) | |

| | | |
|------------|---|------|
| 4184000053 | D18 6X75 GEX 40% IBC SP 10 | 4184 |
| 4184000059 | D18 6X75 USG 40% IBC SL 10 | 4184 |
| 4198000005 | AB21 4X75 USG 40% IBC SL 2005 | 4198 |
| 4198000008 | ABERF21 4X75 GEX 40% CK IBC SP 2005 | 4198 |
| 4198000009 | AB21 4X75 USR 40% IBC SP 2005 | 4198 |
| 4198000014 | AB21 2X75 USG 40% SP CPC | 4198 |
| 4201000388 | ERIVODK 12X100 USG 40% DIV SP 10 | 4201 |
| 4201000389 | ERIVODK 12X75 USG 40% DIV SP 10 | 4201 |
| 4201000390 | ERIVODK 24X37.5 USG 40% DIV SP 10 | 4201 |
| 4201000391 | ERIVODK 24X20 USG 40% DIV SP 10 | 4201 |
| 4201000396 | ERIVODK 12X75 USR 40% DIV SP 10 | 4201 |
| 4201000412 | ERIVODK 6X175 USG 40% DIV SP 10 | 4201 |
| 4201000425 | ERIVODK 12X70 GEX 37.5% SP | 4201 |
| 4202000073 | ERIRED 12X100 USG 20% DIV SP 10 | 4202 |
| 4202000074 | ERIRED 12X75 USG 20% DIV SP 10 | 4202 |
| 4202000075 | ERIRED 24X37.5 USG 20% DIV SP 10 | 4202 |
| 4202000080 | ERIRED 12X75 USR 20% DIV SP 10 | 4202 |
| 4203000044 | ERIBLAC 12X75 USG 20% DIV SP 10 | 4203 |
| 4203000045 | ERIBLAC 24X37.5 USG 20% DIV SP 10 | 4203 |
| 4203000046 | ERIBLAC 24X20 USG 20% DIV SP 10 | 4203 |
| 4203000050 | ERIBLAC 12X75 USR 20% DIV SP 10 | 4203 |
| 4230000085 | GREYORI 2*12X20 USG 40% DIV SP CPC 2005 | 4230 |
| 4230000194 | GREYORI 6X75 USR 40% SP CPC P_SSS | 4230 |
| 4230000198 | GREYORI 2X100 GED 40% CK SP PRO_BGLASS | 4230 |
| 4230000215 | GREYORI 12X75 DO 40% SP STI | 4230 |
| 4230000222 | GREYORI 10*12X5 USG 40% SL 05 NEW | 4230 |
| 4230000223 | GREYORI 6X175 USG 40% SL 05 | 4230 |
| 4230000224 | GREYORI 12X75 USG 40% SL 05 | 4230 |
| 4230000225 | GREYORI 12X37.5 USG 40% SL 05 | 4230 |
| 4230000226 | GREYORI 6X100 USG 40% SL 05 | 4230 |
| 4230000231 | GREYORI 1X450 EUR 40% IBC SP 2005 | 4230 |
| 4230000238 | GREYORI 6X100 USR 40% SL 05 | 4230 |
| 4230000239 | GREYORI 12X75 USR 40% SL 05 | 4230 |
| 4230000242 | GREYORI 6X175 USG 40% SL OPC 05 | 4230 |
| 4230000243 | GREYORI 12X20 USG 40% SL 05 | 4230 |
| 4230000246 | GREYORI 6X175 USR 40% SL 05 | 4230 |
| 4230000247 | GREYORI 12X75 USG 40% SP OPC CPC 05 | 4230 |
| 4230000248 | GREYORI 6X75 USG 40% SP CPC 05 P_SSS | 4230 |
| 4230000249 | GREYORI 12X75 USG 40% CPC GIFT 05 P_GGG | 4230 |
| 4230000266 | GREYORI 12X20 USR 40% DIV SP 2005 CPC | 4230 |
| 4230000267 | GREYORI 12X37.5 USR 40% SP 2005 CPC | 4230 |
| 4230000270 | GREYORI 4X75 USG 40% SP P_SS | 4230 |
| 4230000303 | GREYORI 6X75 USG 40% SP CPC P_GGCS | 4230 |
| 4230000388 | GREYORI 6X75 USG 40% SP P_GGOGP | 4230 |

| | |
|----------------------|-----------|
| DEWARS FOUNDERS RESE | 750ml |
| DEWARS FOUNDERS RESE | 750ml |
| ABERFELDY 21 YEAR OL | 750ml |
| ABERFELDY 21 YEAR OL | 750ml |
| ABERFELDY 21 YEAR OL | 750ml |
| ABERFELDY 21 YEAR OL | 750ml |
| Eristoff Vodka | 1_LTR |
| Eristoff Vodka | 750ml |
| Eristoff Vodka | 375ml |
| Eristoff Vodka | 200_ML |
| Eristoff Vodka | 750ml |
| Eristoff Vodka | 1.75L |
| Eristoff Vodka | 375ml |
| Eristoff Vodka RED | 1_LTR |
| Eristoff Vodka RED | 750ml |
| Eristoff Vodka RED | 375ml |
| Eristoff Vodka RED | 750ml |
| Eristoff Vodka Black | 750ml |
| Eristoff Vodka Black | 375ml |
| Eristoff Vodka Black | 200_ML |
| Eristoff Vodka Black | 750ml |
| GREY GOOSE ORIGINAL | 200_ML |
| GREY GOOSE ORIGINAL | 750ml |
| GREY GOOSE ORIGINAL | 1_LTR |
| GREY GOOSE ORIGINAL | 750ml |
| GREY GOOSE ORIGINAL | 50_ML |
| GREY GOOSE ORIGINAL | 1.75L |
| GREY GOOSE ORIGINAL | 750ml |
| GREY GOOSE ORIGINAL | 375ml |
| GREY GOOSE ORIGINAL | 1_LTR |
| GREY GOOSE ORIGINAL | 4.5_Liter |
| GREY GOOSE ORIGINAL | 1_LTR |
| GREY GOOSE ORIGINAL | 750ml |
| GREY GOOSE ORIGINAL | 1.75L |
| GREY GOOSE ORIGINAL | 200_ML |
| GREY GOOSE ORIGINAL | 1.75L |
| GREY GOOSE ORIGINAL | 750ml |
| GREY GOOSE ORIGINAL | 750ml |
| GREY GOOSE ORIGINAL | 750ml |
| GREY GOOSE ORIGINAL | 200_ML |
| GREY GOOSE ORIGINAL | 375ml |
| GREY GOOSE ORIGINAL | 750ml |
| GREY GOOSE ORIGINAL | 750ml |
| GREY GOOSE ORIGINAL | 750ml |

| | | |
|------------|--|------|
| 5136000013 | SPROSE 12X75 USG 9.5% IBC SP GIFT | 5136 |
| 5182000010 | MOSTRSB 6X75 USG 5% WRS SP | 5182 |
| 9001000119 | MULTI D12 D18 DSIG 40% 6*3X20 GED CK SP | 9001 |
| 9001000137 | MULTI GREYORI/GREYORA/GREYCIT/GREYPOI 4* | 9001 |
| 9001000139 | MULTI ASTI 7.5% + SPROSE 9.5% 2*3*2X75 U | 9001 |
| 9001000146 | MULTI [SIZE] 35% USG RO CPC | 9001 |
| 9001000206 | MULTI BALIMON/BATCHRY/BADRBER 40X5 35% | 9001 |
| 9001000210 | MULTI BASUP/BALIMON/BADRBER 3X75 40% 35% | 9001 |
| 9001000238 | MULTI GREY GOOSE 6*3 20CL 40% USD RO SL | 9001 |
| 9001000249 | MULTI BACARDI FAMILY PACK COC 40% USG | 9001 |
| 9001093094 | MULTI 2X27.5 5.4% IT CC EP PRO_OREXPO | 9001 |
| 9001093133 | MULTI BAWOBER2X175 +3X100 +2X75+20X5 | 9001 |
| 9001093141 | MULTI BAWOBER+ BASUP1X100, 2X100 | 9001 |
| 9001093143 | MULTI GLD+SUP +OAK+ LMN 6X20 USG RO SP | 9001 |
| 9001093144 | MULTI BRND 12X5 SUP+GLD+LIM+OAK+WLF+BRAZ | 9001 |
| 9001093166 | MULTI GG ORI + GG LRNGE 3+3 X 175 | 9001 |
| 9001093167 | MULTI BASUP + BA LIMON 3+3 X 175 | 9001 |
| 9001093168 | MULTI BASUP + BA OAKHEART 3+3 X 175 | 9001 |
| 9001093179 | MULTI BA LIM/DBRY/PRED/WLBRY 4*3X75 35% | 9001 |
| 9001093180 | MULTI GREY ORI/CHN 2*3X100 40% USG CK S | 9001 |
| 9001093186 | MULTI SPH 47%+SUP+DWL+CZR+GGORI 40% 5x75 | 9001 |
| 9001093195 | MLTI BA(WOBER,TCHRY,LIM,RZZ,BRRY,O)20X5 | 9001 |
| 9001093216 | GG MULTI 3X100, 3X100 40, 40% USG CK SP | 9001 |
| 9001093218 | BAPINFU 6X37.5+6X20+20X5 35% USG RO SC | 9001 |
| 9001500014 | BAPINFU 2X175+3X100+2X75+20X5 35% RO SP | 9001 |
| 9001500015 | MULTI BABLRAZ 2X175 +3X100 +2X75+20X5 | 9001 |
| 9001500016 | MULTI BABLRAZ+ BASUP 1X100, 2X100 | 9001 |
| 9001500017 | MULTI BAWOBER 6X37.50+6X20 +20X5 | 9001 |
| 9001500018 | MULTI BABLRAZ 6X37.5 +6X20 +20X5 | 9001 |
| 9001500023 | BAPINFU 35%+GGORI 40% 1X100, 2X100 USG | 9001 |
| 9001500033 | MULTI BASUP,GLD,SEL 4+ 1+1X175 USG 40% | 9001 |

| | | |
|------|----------------------|------------------------|
| 5136 | MARTINI SPARKLING RO | 750ml |
| 5182 | MOSCATO TAPPO RASO S | 750ml |
| 9001 | VAP | 200_ML |
| 9001 | VAP | |
| 9001 | VAP | 750ml |
| 9001 | VAP | |
| 9001 | VAP | |
| 9001 | VAP | 750ml |
| 9001 | VAP | |
| 9001 | VAP | |
| 9001 | VAP | |
| 9001 | VAP | |
| 9001 | VAP | 1_LTR_1.75L_750ml_50ml |
| 9001 | VAP | 1_LTR |
| 9001 | VAP | 200_ML |
| 9001 | VAP | |
| 9001 | VAP | 1.75L |
| 9001 | VAP | 1.75L |
| 9001 | VAP | 1.75L |
| 9001 | VAP | 750ml |
| 9001 | VAP | 1_LTR |
| 9001 | VAP | 750ml |
| 9001 | VAP | |
| 9001 | VAP | 1_LTR |
| 9001 | VAP | 375ml_200ml_50ml |
| 9001 | VAP | 1_LTR_1.75L_750ml_50ml |
| 9001 | VAP | 1_LTR_1.75L_750ml_50ml |
| 9001 | VAP | 1_LTR |
| 9001 | VAP | 375ml_200ml_50ml |
| 9001 | VAP | 375ml_200ml_50ml |
| 9001 | VAP | 1_LTR |
| 9001 | VAP | 1.75L |

| Material | Description |
|------------|--|
| 3169000008 | DRAMBUI 120X5 USG 40% PET |
| 3169000101 | DRAMBUI 120X5 USG 40% PET |
| 3169000124 | DRA15YO 120X5 USG 43% SP PET |
| 3187000030 | DISARON 120X5 USG 28% PET |
| 3187000067 | DISARON 120X5 USD 28% SP PET |
| 4117000958 | DWL 10*12X5 USG 40% DIV SL 10 PET |
| 4117000982 | DWL 16*12X5 USG 40% CAR SL 10 PET |
| 4117000985 | DWL 16*12X5 GEX 40% CAR SP 10 PET |
| 4201000387 | ERIVODK 6X175 USG 40% DIV SP 10 PET |
| 4201000392 | ERIVODK 48X5 USG 40% DIV SP 10 PET |
| 4201000393 | ERIVODK 6X175 USR 40% DIV SP 10 PET |
| 4202000077 | ERIREL 48X5 USG 20% DIV SP 10 PET |
| 4202000083 | ERIREL 96X5 USG 20% DIV SP 10 PET |
| 4203000047 | ERIBLAC 48X5 USG 20% DIV SP 10 PET |
| 4715001194 | BRZIPI 6*4X33 CA 5% SC PET |
| 4715001197 | BRZORS 6*4X33 CA 5% SC PET |
| 4715001199 | BRZPICO 6*4X33 CA 5% SC PET |
| 4715001202 | BRZSTDA 6*4X33 CA 5% SC PET |
| 4715600025 | BRZBOMP 6*4X33 CA 5% CAR PET |
| 4862000006 | DHHONEY 120X5 USG 40% IBC SL DIST PET |
| 9001000101 | MULTI BA 24*6X5 35% GED RO SP PET PRO_FL |
| 9001000203 | MULTI 6*2X75 40, 40% USG RO SP CPC PET |

| Brand | Size |
|--------------------------|----------|
| DRAMBUIE | 50_ML |
| DRAMBUIE | 50_ML |
| DRAMBUIE | 50_ML |
| DISARONNO AMARETTO | 50_ML |
| DISARONNO AMARETTO | 50_ML |
| DEWARS WHITE LABEL | 50_ML |
| DEWARS WHITE LABEL | 50_ML |
| DEWARS WHITE LABEL | 50_ML |
| Eristoff Vodka | 1.75_LTR |
| Eristoff Vodka | 50_ML |
| Eristoff Vodka | 1.75_LTR |
| Eristoff Vodka RED | 50_ML |
| Eristoff Vodka RED | 50_ML |
| Eristoff Vodka Black | 50_ML |
| Breezers | 330_ML |
| Breezers | 330_ML |
| Breezers | 330_ML |
| Breezers | 330_ML |
| Breezers | 330_ML |
| DEWAR'S HIGHLANDER HONEY | 50_ML |
| VAP | 50_ML |
| VAP | 750_ML |