



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

Division of Privacy and Identity Protection

June 19, 2008

**BY EMAIL AND U.S. MAIL**

Anthony E. DiResta, Esq.  
Reed Smith LLP  
1301 K Street, N.W.  
Suite 1100 - East Tower  
Washington, DC 20005-3373

Dear Mr. DiResta:

This letter follows up on your June 18, 2008 email and discussions with Commission staff regarding the FTC's Civil Investigative Demand ("CID") issued on May 20, 2008 to your client, CVS Caremark Corp. (the "Company"). With respect to Document Specification 8, you have asked to modify the specification to allow the Company to produce documents containing unredacted personal information because redaction would be overly burdensome, and for an extension of time to respond. Although we reserve all rights of the Commission with respect to the CID as originally propounded, both for document and written interrogatory specifications, we have agreed to limit the Company's initial responses as described below. This agreement is contingent on full and complete production in accordance with the terms and dates outlined below.

**Document Specification**

For purposes of the Company's initial response to Document Specification 8 of the CID, the Specification is modified as follows:

(1) Document Specification 8:

8. Without redacting personal information, all documents relating to the Liberty, Texas dumping incident (referenced and defined in the FTC letter of September 27, 2007, n. 1 and corresponding text) that:

(a) [unchanged]

(b) [unchanged]

(c) [unchanged]

(d) [unchanged].

(2) Production Schedule for Document Specification 8, as modified:

The Company's initial response to Document Specification 8 will be produced according to the following schedule:

- a. all responsive materials other than approximately 50 percent of credit card receipts shall be produced by June 20, 2008; and
- b. the remaining credit card receipts shall be produced by June 25, 2008.

If you have any questions, please do not hesitate to contact Alain Sheer (202.326.3321), Loretta H. Garrison (202.326.3043), or Kristin K. Cohen (202.326.2276).

Sincerely,



Joel C. Winston  
Associate Director  
Division of Privacy and Identity Protection

cc: Jessica Rich  
Alain Sheer  
Loretta H. Garrison  
Kristin K. Cohen