

ORIGINAL



UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of )

Polypore International, Inc. )  
a corporation. )

Docket No. 9327

PUBLIC

**NON-PARTY ENERSYS' MOTION FOR *IN CAMERA* TREATMENT  
OF CERTAIN DESIGNATED HEARING EXHIBITS**

Non-Party EnerSys ("EnerSys") respectfully moves for *in camera* treatment of certain hearing exhibits that either Respondent Polypore International, Inc. ("Respondent") or the Federal Trade Commission ("FTC") have designated for possible introduction in the administrative hearing in this matter, scheduled to commence on May 12, 2009.<sup>1</sup> Each of the documents was designated by EnerSys as "CONFIDENTIAL" in accordance with the terms of the Protective Order entered by the Court on October 23, 2008.<sup>2</sup> These documents contain highly confidential and proprietary information that is both secret and material to EnerSys' present and future business, public disclosure of which would harm EnerSys.

As a result, EnerSys respectfully requests that the Administrative Law Judge enter an Order pursuant to Rule 3.45(b) of the Federal Trade Commission Rules of Practice, 16 C.F.R. § 3.45(b), granting *in camera* treatment for no less than ten (10) years, to the documents listed in Exhibit 1 attached to this Motion and the proposed Order.

<sup>1</sup> In view of the Court's Order dated April 8, 2009, granting the parties' Joint Motion to revise the Scheduling Order, EnerSys does not move for *in camera* treatment of deposition testimony designated by Respondent but respectfully reserves the right to do so if an EnerSys witness is unavailable and the party seeking to designate testimony has complied with the Court's Order.

<sup>2</sup> To be precise, EnerSys' first two document productions predated the issuance of the Protective Order but was designated confidential nonetheless. In response to a subpoena served by the Federal Trade Commission in connection with its investigation, EnerSys produced 837 pages of documents to the FTC in May 2008 with a standard request that they be treated as confidential. The FTC subsequently produced those documents to Respondent on the condition that they would be treated as confidential under the Protective Order.

In support of this Motion, EnerSys respectfully refers the Court to the accompanying Declaration of Larry Axt, Exhibit 2 hereto, and Memorandum of Law.

Dated: April 9, 2009

STEVENS & LEE, P.C.

By 

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**Exhibits for Which EnerSys Requests *In Camera* Treatment**

<b>Exhibit Number</b>	<b>Exhibit Title</b>	<b>Date</b>	<b>BEGDOC</b>	<b>ENDDOC</b>
RX00206	Memorandum of Understanding between EnerSys Delaware, Inc. and Microporous Products, L.P.	2/10/2006	EN00001	EN00005
RX00205	Global Supply Agreement between EnerSys Capital Inc. and Daramic, LLC	11/2/2006	EN00052	EN00062
RX00221	Email Axt to Burkert FW: DaramicSummary (2).xls	8/20/2008	EN01663	EN01665
RX00223	Email Ayrton to Burkert re: PE Separator	6/9/2008	EN02371	EN02372
RX01205	Email from George Ayrton to Larry Burkert and Gery Bonduelle	6/9/2008	EN02371	EN02372
RX00214	Email Gagge to Burkert re Dahm request	8/19/08	EN03437	EN03437
RX00220	Economic Assumptions	00/00/2009	EN040043	EN040045
RX00242	Purchasing Outlook	00/00/2009	EN040043	EN040163
RX00233	Daramic/Amerace	---	EN040674	EN040677
RX00202	Email re proposal 2008 for gauntlets	11/9/2007	EN04463	EN04465
RX00228	Email McDonald to Burkert re Pricing	10/1/2007	EN05748	EN05751
RX00234	Road show presentation used for IPO in 2004	7/00/2004	EN18267	EN18300
RX00239	Email alternative source	6/6/2008	EN18714	EN18714
RX01206	E-Mail from George Ayrton to Larry Axt, John Gagge and Larry Burkert	10/21/2008	EN19650	EN19652
RX01208	E-Mail from Larry Burkert to John Gagge, George Ayrton, Jan reber, Jason Wallis and Chuck Bartlett	8/13/2008	EN19700	EN19701
RX00212	Email Bartlett, Ayrton, Gagge re Folder	11/12/2008	EN19703	EN19704
RX00215	Email Gagge to Ayrton use of PVC and PE manufacturing	5/13/2008	EN19884	EN19885
RX00216	Email Gagge to Ayrton re use of PVC	5/13/2008	EN19886	EN19887
RX00222	Wallis to Burkert re Anpei quote	10/29/2007	EN23835	EN23841
RX01012	Email from Kung to EnerSys	3/12/2008	EN24397	EN24409
RX00203	Email, JH International, Inc. to EnerSys regarding increased capacity of Baoding Fengfan Rising battery separator company	3/12/2008	EN24405	EN24405

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RX00197	Email regarding Daramic PE Update	4/9/2007	EN26162	EN26162
RX00235	Email Kubis to Craig and Axt regarding Entek	10/9/2006	EN26191	EN26192
RX01203	US Separator Supply Options Chart		FTC-ENER-000121	FTC-ENER-000163
RX00200	Email regarding EnerSys data re costs to import	8/22/2008	FTC-ENER-000218	FTC-ENER-000218
RX01017	Email from Burkert re Daramic case	11/13/2008	FTC-ENER-002298	FTC-ENER-002298
PX1200	Memorandum of Understanding between EnerSys and Microporous Products LP	2/10/2006	EN00001	EN00005
PX1201	Email to Axt from Roe re: Global Supply Proposal	5/17/2006	EN00006	EN00007
PX1203	Letter to Axt from Roe re: EnerSys Sourcing Decision	7/20/2006	EN00009	EN00011
PX1204	Letter to Axt from Roe re EnerSys Worldwide Purchase & Sale Agreement	8/11/2006	EN00012	EN00015
PX1211	Letter to Shea et al. from Hauswald re: Settlement Discussions/Contract Extension	10/16/2006	EN00022	EN00023
PX1224	EnerSys & Daramic Global Supply Agreement	11/2/2006	EN00052	EN00062
PX1225	EnerSys Mutual Non-Disclosure Agreement	2/10/2006	EN00063	EN00065
PX1226	Microporous Products LP and EnerSys Purchase and Supply Agreement	1/2/2007	EN00066	EN00081
PX1234	Chart: Undated EnerSys Separator Requirements and Supply	---	EN00698	EN00698
PX1241	Email to Gris from Lipkowitz re: EnerSys data re: costs to input	8/22/2008	FTC-ENER-000218	FTC-ENER-000218
PX1243	Daramic/Amerace Company Info.	---	EN040674	EN040677
PX1248	Email to Burkert from Wallis re: Quotation	10/29/2007	EN23835	EN23841
PX1249	Email to Ayrton from Gagge re: Light Duty	5/13/2008	EN19884	EN19885

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PX1250	Email to Ayrton from Gagge re: Light Duty	5/13/2008	EN19886	EN19887
PX1256	EnerSys Daramic Update	---	EN24420	EN24421
PX1259	Business Chart	---	EN03433	EN03435
PX1261	Email to Burkert from Gagge re: Separator Cost	5/12/2008	EN03406	EN03406
PX1263	Letter to Axt from Roe re: cost increases for Daramic polyethylene separator material	11/24/2008	EN03069	EN03070
PX1264	Email to Axt and Burkert from Gilchrist re: proposed amendment to supply agreement	7/17/2007	EN03442	EN03442
PX1265	Meeting Minutes for MPLP/ EnerSys Meeting, Aras, France	5/14/2007	EN00470	EN00470
PX1268	Chart: Daramic Cost	---	EN03200	EN03201
PX1269	Letter to Axt from Roe re: EnerSys Worldwide Purchase & Sales Agreement	4/11/2006	EN032982	EN039285
PX1270	Email to Evans from Borowski re: PVC and MP products	3/7/2008	EN02754	EN02755
PX1276	Email to Gagge and Burkert from Ayrton re: Separator Plant Replies	10/23/2008	EN02237	EN02238
PX1279	Email to Ayrton from Roe re: Request for Deviation	9/12/2008	EN02009	EN02010
PX1289	Letter to Axt from Roe re: EnerSys Worldwide Purchase & Sales Agreement	2/26/2006	EN039279	EN039281
PX1600	Letter to Axt from Roe re EnerSys Sourcing Decision	7/20/2006	EN10960	EN10962
PX2129	Email to Spease from Ayrton re: drawings for PVC leaf separators	9/3/2008	EN01975	EN01980
PX2130	Email to Hortiales, Maquivar from Ayrton re: Cell Force leaf separators	9/24/2008	EN02325	EN02340
PX2132	Sales Chart	---	EN03142	EN03143
PX2134	Email to Romero from Scherzer re: new price for AGM separator	1/26/2007	EN03268	EN03269
PX2135	EnerSys Pricing Richmond, KY	---	EN03446	EN03446
PX2138	Email to Rulis from Lin re: Letter Dated October 6, 2006	10/9/2006	EN12887	EN12911

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7. All of this information is held in strict confidence by EnerSys.
8. If such information were publicly disclosed, EnerSys would suffer serious competitive injury because its competitors could use this non-public information to their advantage and nullify the competitive advantages gained by EnerSys.
9. EnerSys' request that *in camera* treatment for the Subject Documents be maintained for ten years is reasonable in light of the commercial realities of the commercial battery industry.
10. Contracts typically continue in force for a number of years and are often renegotiated and renewed with substantial incorporation of the terms of preceding contracts.
11. The Subject Documents themselves establish the frequency of amendments of such contracts and the duration of such contracts.
12. Product development, and strategies for suppliers, procurement and pricing strategies are often similarly long-term in nature in this industry.
13. Under these circumstances, it is uncertain as to when the documents will no longer reflect current pricing and contract terms, or product development and supplier strategy and planning.
14. Moreover, the market is such that even disclosure of terms of contracts no longer in force creates an unreasonable and unnecessary risk of competitive harm to EnerSys such that *in camera* treatment should extend for a period of at least ten years, a reasonable

estimate of the minimum length of time for the contracts at issue to expire and their terms to become outdated and irrelevant.

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

EXECUTED this 8<sup>th</sup> day of April, 2009.

  
\_\_\_\_\_  
LARRY AXT

**CERTIFICATE OF SERVICE**

I hereby certify that on April 9, 2009, I filed via overnight courier and electronic mail delivery an original and two copies of the foregoing Non-Party EnerSys' Motion for *In Camera* Treatment of Certain Designated Hearing Exhibits and proposed Order with:

Donald S. Clark, Secretary  
Office of the Secretary  
Federal Trade Commission  
600 Pennsylvania Avenue, NW, Rm. H-135  
Washington, DC 20580  
secretary@ftc.gov

I hereby certify that on April 9, 2009, I delivered via overnight courier and electronic mail delivery two copies of the foregoing Non-Party EnerSys' Motion for *In Camera* Treatment of Certain Designated Hearing Exhibits and proposed Order to:

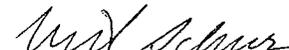
The Honorable D. Michael Chappell  
Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
oalj@ftc.gov

I hereby certify that on April 9, 2009, I served via overnight courier and electronic mail delivery a copy of the foregoing Non-Party EnerSys' Motion for *In Camera* Treatment of Certain Designated Hearing Exhibits and proposed Order on:

Eric D. Welsh, Esquire  
Parker Poe Adams & Bernstein, LLP  
Three Wachovia Center  
401 S. Tryon Street, Suite 3000  
Charlotte, NC 28202  
ericwelsh@parkerpoe.com

Steven A. Dahm, Esquire  
Federal Trade Commission  
Bureau of Competition  
Mergers II Division  
601 New Jersey Avenue, NW  
Washington, D.C. 20001  
sdahm@ftc.gov

Date: April 9, 2009

  
\_\_\_\_\_  
Neil C. Schur



Subject Documents is secret, commercially sensitive, and material to EnerSys' current and prospective business.

As a result, EnerSys respectfully requests that the Administrative Law Judge enter an Order pursuant to Rule 3.45(b) of the Federal Trade Commission Rules of Practice, 16 C.F.R. § 3.45(b), granting *in camera* treatment for no less than ten (10) years, to the Subject Documents listed in Exhibit 1 attached to EnerSys' Motion and the proposed Order submitted herewith.

## **II. Standard for In Camera Treatment**

Materials merit *in camera* treatment when their public disclosure of the documents "will result in a clearly defined, serious injury to the person or corporation whose records are involved." *H.P. Hood & Sons, Inc.*, 58 F.T.C. 1184, 1188 (1961). Such serious injury can be established by showing that the information at issue is "sufficiently secret and sufficiently material to the applicant's business that disclosure would result in serious competitive injury." *In re General Foods Corp.*, 95 F.T.C. 352, 355 (1980); *In the Matter of Bristol Meyers Co.*, 90 F.T.C. 455, 456 (1977).

The following factors should be weighed in considering both secrecy and materiality: (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 amount of effort or money expended by the applicant in developing the information; and (6) the ease or difficulty with which the information could be properly acquired or duplicated by others. *In the Matter of Bristol Meyers Co.*, 90 F.T.C. at 456.

A showing of injury may consist of extrinsic evidence or, in certain instances, may be inferred from the nature of the documents themselves. *In the Matter of E.I. Dupont*

*de Nemours & Co.*, 97 F.T.C. 116 (1981). Administrative law judges have broad discretion in applying these factors to determine whether information warrants in camera treatment. *See In re General Foods Corp.*, 95 F.T.C. 352 (1980). Moreover, the Commission has stated that a request for *in camera* treatment by a non-party company to the FTC proceeding (such as EnerSys) should be given “special solicitude.” *In re Crown Cork & Seal Co.*, 71 F.T.C. 1714 (1967) (“[P]etitioner’s plea warrants special solicitude coming as it does from a third-party bystander in no way involved in the proceedings whose records, if in camera treatment is denied, will be open to the scrutiny of its competitors”); *accord Kaiser Aluminum & Chemical Corp.*, 103 F.T.C. 500 (1984) (requests for in camera treatment by third parties should be given special solicitude because, as a policy matter, such treatment encourages the third party to cooperate with future adjudicative discovery requests).

### **III. The Subject Documents Meet the Standard for In Camera Treatment**

Each of the Subject Documents has been maintained internally by EnerSys in a confidential manner, only being shared with those individuals requiring knowledge of the information contained within the document. The information was not made available to EnerSys’ competitors or other outside persons. As such, when legally compelled to produce the information under subpoena, the Subject Documents were designated “CONFIDENTIAL” in accordance with the terms of the Protective Order.

EnerSys respectfully submits that *in camera* treatment is warranted for the Subject Documents because (1) EnerSys will suffer serious competitive harm if the Subject Documents are disclosed to the public; (2) the information contained in the Subject Documents is secret; and (3) the risk of harm is not outweighed by the importance of the information to the matter decided by the Commission.

As set forth in the Declaration of Larry Axt, attached to EnerSys' Motion as Exhibit 2, the Subject Documents contain commercially proprietary and confidential information regarding EnerSys' pricing, costing, procurement spending, supply of raw materials or inputs (in particular, the polyethylene separators at issue in this case), purchasing outlook, planning and strategy, and product technical detail. All of this information is held in strict confidence by EnerSys. If such information were publicly disclosed, EnerSys would suffer serious competitive injury because its competitors could use this non-public information to their advantage and nullify the competitive advantages gained by EnerSys. In addition, EnerSys is a publicly traded company, and the public disclosure of this confidential non-public information may improperly and unnecessarily influence both stock prices and investor confidence, causing further harm to EnerSys.

Moreover, as a non-party seeking *in camera* treatment for its confidential business information, EnerSys' request should be treated with "special solicitude." *In the Matter of Kaiser Aluminum & Chemical Corporation*, 103 F.T.C. 500 (1984) (order directing *in camera* treatment for sales statistics over five years old). Reasonable periods of *in camera* treatment encourage non-parties to cooperate with future discovery requests in adjudicative proceedings. *Id.* At great expense, EnerSys has cooperated with the discovery demands of both parties to this case, producing tens of thousands of pages of documents and four witnesses for deposition (two of whom were also separately examined under oath in connection with the FTC's investigation of the facts of this matter). The Subject Documents have been made available – at substantial cost to EnerSys – for use by the FTC and Respondent in accordance with the terms of the Protective Order.

at issue in this case), procures its raw materials, and negotiates, structures and retains its contractual and business relationships with suppliers. Disclosure of the Subject Documents would result in a clearly defined serious injury to EnerSys. Accordingly, for the reasons set forth above and in the Declaration of Larry Axt, Exhibit 2 to EnerSys' Motion, EnerSys respectfully requests that this Court grant its motion directing *in camera* treatment for the Subject Documents.

Dated: April 9, 2009

STEVENS & LEE, P.C.

By Neil C. Schur

Neil C. Schur

Eugene V. Lipkowitz

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**UNITED STATES OF AMERICA  
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**In the Matter of**

**Polypore International, Inc.  
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**ORDER**

Upon consideration of the motion of EnerSys for *in camera* treatment of certain designated hearing exhibits, it is hereby ordered that the Motion is GRANTED, and the documents identified on Exhibit 1 of EnerSys' Motion, which is attached hereto, shall be afforded *in camera* treatment pursuant to Rule 3.45(b) of the Federal Trade Commission Rules of Practice, 16 C.F.R. § 3.45(b) for ten (10) years from the date of this Order.

ENTER:

Dated: April \_\_, 2009

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Administrative Law Judge D. Michael Chappell

**Exhibits for Which EnerSys Requests *In Camera* Treatment**

<b>Exhibit Number</b>	<b>Exhibit Title</b>	<b>Date</b>	<b>BEGDOC</b>	<b>ENDDOC</b>
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