

PUBLIC

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



In the Matter of
Tronox Limited
a corporation,

Docket No. 9377

National Industrialization
Company (TASNEE)
a corporation,

The National Titanium Dioxide
Company Limited (Cristal)
a corporation, And

Cristal USA Inc.
a corporation.

RESPONDENT TRONOX LIMITED'S
SUPPLEMENTAL MOTION FOR *IN CAMERA* TREATMENT OF TRIAL EXHIBITS

Tronox Limited (“Tronox”), by and through its undersigned counsel, respectfully moves pursuant to 16 C.F.R. § 3.45(b) and the scheduling order in this matter (as revised February 23, 2018) for *in camera* treatment of certain proposed trial exhibits that were not included in Tronox’s initial motion for *in camera* treatment.

The legal standard and confidentiality categories described in Tronox’s initial motion apply equally here. The Court granted that motion in its entirety without objection by Complaint Counsel. *See* Order dated May 15, 2018. Accordingly, Tronox incorporates by reference its initial motion and supporting declaration.

The documents at issue fall into two groups: (1) Exhibits that were modified or newly designated by Respondents or Complaint Counsel since Tronox filed its initial motion; and (2) exhibits that were inadvertently excluded from Tronox’s initial motion. The relevant documents

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are listed in Exhibit A. The exhibit states the reasons why *in camera* treatment is appropriate for each exhibit, the time period for which such treatment is requested, and the reason why each document was not included in Tronox's initial motion.

Tronox respectfully moves that its first supplemental motion for *in camera* treatment be granted.

May 15, 2018

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ATTORNEYS FOR TRONOX LIMITED

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EXHIBIT A

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested	Reason for Inclusion in Supplemental Motion
PX1002	Business and Strategic Plans; Aggregated Price and Volume Information	10 Years	Inadvertently Omitted
PX1003	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1004	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1006	Business and Strategic Plans; Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years	Inadvertently Omitted
PX1008	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years	Inadvertently Omitted
PX1009	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years	Inadvertently Omitted
PX1010	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years	Inadvertently Omitted
PX1011	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1012	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1014	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1030	Business and Strategic Plans; Price-Setting	10 Years	Inadvertently Omitted
PX1032	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1045	Sensitive Personal Information	Indefinite	Inadvertently Omitted
PX1050	Specific Price and Volume Information	10 Years	Inadvertently Omitted
PX1109	Business and Strategic Plans; Capacity, Production, and Inventory Information; Aggregated Price and Volume Information	10 Years	Inadvertently Omitted
PX1136	Specific Price and Volume Information	10 Years	Inadvertently Omitted
PX1229	Sensitive Personal Information	Indefinite	Inadvertently Omitted
PX1233	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1261	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1276	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1281	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1282	Business and Strategic Plans; Capacity, Production, and Inventory Information	10 Years	Inadvertently Omitted
PX1327	Business and Strategic Plans; Specific Price and Volume Information	10 Years	Inadvertently Omitted
PX1361	Trade Secrets	Indefinite	Inadvertently Omitted
PX1373	Capacity, Production, and Inventory Information	10 Years	Inadvertently Omitted
PX1400	Aggregated Price and Volume Information	5 Years	Inadvertently Omitted
PX1410	Aggregated Price and Volume Information	10 Years	Inadvertently Omitted
PX1442	Specific Price and Volume Information	10 Years	Inadvertently Omitted
PX1476	Sensitive Personal Information	Indefinite	Inadvertently Omitted
PX1487	Specific Price and Volume Information	10 Years	Inadvertently Omitted
PX1496	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1501	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1504	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1551	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1554	Aggregated Price and Volume Information	5 Years	Inadvertently Omitted
PX1559	Specific Price and Volume Information; Aggregated Price and Volume Information	10 Years	Inadvertently Omitted
PX1586	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1599	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1600	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX1607	Specific Price and Volume Information	10 Years	Inadvertently Omitted
PX1615	Price-Setting	10 Years	Inadvertently Omitted
PX1619	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years	Inadvertently Omitted
PX1620	Business and Strategic Plans; Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years	Inadvertently Omitted
PX1745	Business and Strategic Plans	10 Years	Inadvertently Omitted
PX4181	Specific Price and Volume Information	10 Years	New or Modified Exhibit
PX7013	Business and Strategic Plans	10 Years	New or Modified Exhibit
PX7017	Business and Strategic Plans	10 Years	New or Modified Exhibit
PX7018	Business and Strategic Plans	10 Years	New or Modified Exhibit
PX7019	Business and Strategic Plans	10 Years	New or Modified Exhibit
PX7023	Business and Strategic Plans	10 Years	New or Modified Exhibit

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested	Reason for Inclusion in Supplemental Motion
PX7024	Business and Strategic Plans	10 Years	New or Modified Exhibit
PX7026	Business and Strategic Plans	10 Years	New or Modified Exhibit
PX7032	Business and Strategic Plans	10 Years	New or Modified Exhibit
PX7037	Business and Strategic Plans	10 Years	New or Modified Exhibit
PX7038	Business and Strategic Plans	10 Years	New or Modified Exhibit
PX7042	Business and Strategic Plans	10 Years	New or Modified Exhibit
PX7043	Business and Strategic Plans	10 Years	New or Modified Exhibit
PX7048	Business and Strategic Plans	10 Years	New or Modified Exhibit
PX7050	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX0170	Business and Strategic Plans; Capacity, Production, and Inventory Information; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX0171	Business and Strategic Plans; Capacity, Production, and Inventory Information; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX0284	Business and Strategic Plans; Price-Setting	10 Years	Inadvertently Omitted
RX0390	Specific Price and Volume Information	10 Years	Inadvertently Omitted
RX0445	Specific Price and Volume Information	10 Years	Inadvertently Omitted
RX0469	Specific Price and Volume Information	10 Years	Inadvertently Omitted
RX0551	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX0582	Specific Price and Volume Information	10 Years	Inadvertently Omitted
RX0593	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX0886	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX0900	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX0986	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX0990	Business and Strategic Plans; Specific Price and Volume Information	10 Years	Inadvertently Omitted
RX1010	Specific Price and Volume Information	10 Years	Inadvertently Omitted
RX1043	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX1044	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX1049	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX1050	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX1051	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX1052	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX1053	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX1054	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX1055	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX1060	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX1061	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX1063/PX5000	Business and Strategic Plans; Capacity, Production, and Inventory Information; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1064/PX5001	Business and Strategic Plans; Capacity, Production, and Inventory Information; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1089	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX1102	Business and Strategic Plans	10 Years	Inadvertently Omitted
RX1258	Business and Strategic Plans; Capacity, Production, and Inventory Information; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1341/PX5000	Business and Strategic Plans; Capacity, Production, and Inventory Information; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1342/PX5002	Business and Strategic Plans; Capacity, Production, and Inventory Information; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1359	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX1360	Business and Strategic Plans; Trade Secrets	Indefinite	New or Modified Exhibit
RX1380	Business and Strategic Plans; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1404	Business and Strategic Plans; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1417	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX1418	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX1429	Specific Price and Volume Information	10 Years	New or Modified Exhibit
RX1442	Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1461	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX1463	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX1466	Business and Strategic Plans	10 Years	New or Modified Exhibit

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested	Reason for Inclusion in Supplemental Motion
RX1467	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX1468	Business and Strategic Plans; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1469	Business and Strategic Plans; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1470	Business and Strategic Plans; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1471	Business and Strategic Plans; Capacity, Production, and Inventory Information	10 Years	New or Modified Exhibit
RX1472	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX1474	Business and Strategic Plans; Capacity, Production, and Inventory Information	10 Years	New or Modified Exhibit
RX1475	Business and Strategic Plans; Capacity, Production, and Inventory Information	10 Years	New or Modified Exhibit
RX1476	Business and Strategic Plans; Capacity, Production, and Inventory Information	10 Years	New or Modified Exhibit
RX1477	Business and Strategic Plans; Capacity, Production, and Inventory Information	10 Years	New or Modified Exhibit
RX1478	Capacity, Production, and Inventory Information	10 Years	New or Modified Exhibit
RX1479	Business and Strategic Plans; Capacity, Production, and Inventory Information	10 Years	New or Modified Exhibit
RX1480	Business and Strategic Plans; Capacity, Production, and Inventory Information	10 Years	New or Modified Exhibit
RX1482	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX1483	Capacity, Production, and Inventory Information	10 Years	New or Modified Exhibit
RX1484	Business and Strategic Plans; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1485	Business and Strategic Plans; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1486	Capacity, Production, and Inventory Information; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1487	Capacity, Production, and Inventory Information	10 Years	New or Modified Exhibit
RX1488	Capacity, Production, and Inventory Information; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1491	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX1492	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX1493	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX1494	Trade Secrets	Indefinite	New or Modified Exhibit
RX1495	Trade Secrets	Indefinite	New or Modified Exhibit
RX1496	Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1497	Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1498	Specific Price and Volume Information	10 Years	New or Modified Exhibit
RX1499	Specific Price and Volume Information	10 Years	New or Modified Exhibit
RX1500	Specific Price and Volume Information	10 Years	New or Modified Exhibit
RX1501	Capacity, Production, and Inventory Information	10 Years	New or Modified Exhibit
RX1503	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX1509	Business and Strategic Plans	10 Years	New or Modified Exhibit
RX1597	Business and Strategic Plans; Capacity, Production, and Inventory Information; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1604/PX5003	Business and Strategic Plans; Capacity, Production, and Inventory Information; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit
RX1605	Business and Strategic Plans; Capacity, Production, and Inventory Information; Aggregated Price and Volume Information	10 Years	New or Modified Exhibit

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2018, I filed the foregoing document electronically using the FTC's E-Filing System, which will send notification of such filing to:

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The Honorable D. Michael Chappell
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I also certify that I caused the foregoing document to be served via email to:

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/s/ Michael F. Williams
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CERTIFICATE FOR ELECTRONIC FILING

I certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the paper original and that I possess a paper original of the signed document that is available for review by the parties and the adjudicator.

May 15, 2018

By: /s/ Michael F. Williams
Michael F. Williams

Notice of Electronic Service

I hereby certify that on May 15, 2018, I filed an electronic copy of the foregoing Tronox Limited's Supplemental Motion for In Camera Treatment of Trial Exhibits, with:

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I hereby certify that on May 15, 2018, I served via E-Service an electronic copy of the foregoing Tronox Limited's Supplemental Motion for In Camera Treatment of Trial Exhibits, upon:

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I hereby certify that on May 15, 2018, I served via other means, as provided in 4.4(b) of the foregoing Tronox Limited's Supplemental Motion for In Camera Treatment of Trial Exhibits, upon:

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