

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

ORIGINAL

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 THIRD
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 prior motions 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. The Court similarly granted Tronox's first supplemental motion for *in camera* treatment after Tronox withdrew its request for *in camera* treatment regarding one document to which Complaint Counsel objected. *See* Order dated May 18, 2018. The Court also granted Tronox's second supplemental motion for *in camera* treatment without

objection by Complaint Counsel. *See* Order dated May 30, 2018. Accordingly, Tronox incorporates by reference its initial motion and supporting declaration, as well as its first and second supplemental motions.

The documents for which Tronox seeks *in camera* treatment contain proprietary and confidential information related to supply. These documents were submitted into evidence on May 30, 2018.

The relevant documents are listed in the table below. The table states the reasons why *in camera* treatment is appropriate for each exhibit and the time period for which such treatment is requested.

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

PX	Confidentiality Category	Duration of <i>In Camera</i> Treatment Requested
PX1342	Information Regarding Price-Setting Processes; Capacity, Production, and Inventory Information	10 Years
RX2005	Information Regarding Price-Setting Processes; Capacity, Production, and Inventory Information	10 Years
RX2006	Information Regarding Price-Setting Processes; Capacity, Production, and Inventory Information	10 Years

June 12, 2018

/s/ Michael F. Williams, P.C.

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UNITED STATES OF AMERICA
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National Industrialization
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Company Limited (Cristal)
a corporation, And

Cristal USA Inc.
a corporation.

**[PROPOSED] ORDER ON RESPONDENT TRONOX LIMITED'S THIRD
SUPPLEMENTAL MOTION FOR *IN CAMERA* TREATMENT OF TRIAL EXHIBITS**

Upon consideration of Respondent Tronox Limited's Third Supplemental Motion for *In Camera* Treatment of Trial Exhibits, *in camera* treatment is hereby granted for a period of ten years regarding PX1342, RX2005 and RX2006.

ORDERED:

D. Michael Chappell
Chief Administrative Law Judge

Date: _____

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2018, I filed the foregoing document electronically using the FTC's E-Filing System, which will send notification of such filing to:

Donald S. Clark
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The Honorable D. Michael Chappell
Administrative Law Judge
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Washington, DC 20580

I also certify that I caused the foregoing document to be served via email to:

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Counsel supporting Complaint

Counsel for Respondents National Industrialization Company (TASNEE), The National Titanium Dioxide Company Limited (Cristal), and Cristal USA, Inc.

/s/ Michael F. Williams
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Counsel for Respondents Tronox Limited

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.

June 12, 2018

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

Notice of Electronic Service

I hereby certify that on June 12, 2018, I filed an electronic copy of the foregoing Respondent Tronox Limited's Third Supplemental Motion for In Camera Treatment of Trial Exhibits, with:

D. Michael Chappell
Chief Administrative Law Judge
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Washington, DC, 20580

Donald Clark
600 Pennsylvania Ave., NW
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I hereby certify that on June 12, 2018, I served via E-Service an electronic copy of the foregoing Respondent Tronox Limited's Third Supplemental Motion for In Camera Treatment of Trial Exhibits, upon:

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I hereby certify that on June 12, 2018, I served via other means, as provided in 4.4(b) of the foregoing Respondent Tronox Limited's Third Supplemental Motion for In Camera Treatment of Trial Exhibits, upon:

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Andrew Pruitt
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