

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



In the Matter of  
Otto Bock HealthCare North America, Inc.,  
a corporation

Respondent.

Docket No. 9378

PUBLIC DOCUMENT

ORIGINAL

**RESPONDENT’S SECOND MOTION FOR *IN CAMERA* TREATMENT  
OF CERTAIN TRIAL EXHIBITS**

Pursuant to Rule 3.45(b) of the Federal Trade Commission Rules of Practice, 16 C.F.R. § 3.45(b), the January 18, 2018 Scheduling Order (“Scheduling Order”),<sup>1</sup> the December 20, 2017 Protective Order Governing Confidential Material (“Protective Order”), and in response to Administrative Law Judge Chappell’s July 2, 2018 Order on Respondent’s First Motion for *In Camera* Treatment (the “July 2nd Order”), Respondent Otto Bock HealthCare North America, Inc. (“Ottobock”) has substantially narrowed the exhibits for which it seeks *in camera* treatment. Ottobock has conducted a complete and thorough review of every exhibit identified in Ottobock’s original motion for *in camera* treatment, and has followed the guidance of the July 2nd Order in doing so. In Ottobock’s original motion, it requested *in camera* treatment for 683 exhibits. Through its comprehensive review and removal of duplicates, Ottobock reduced the total number of exhibits requested for *in camera* treatment to 451, which is only 66% of its original request.<sup>2</sup> Additionally, pursuant to the July 2nd Order, Ottobock has designated the

<sup>1</sup> As amended by Order dated April 26, 2018.

<sup>2</sup> The July 2nd Order reviewed Ottobock’s and Freedom’s Motions together. The July 2nd Order noted that the two Motions, combined, sought *in camera* treatment for 1,699 documents. After a comprehensive review and narrowing, Ottobock’s and Freedom’s Second Motions for *In Camera* Treatment only seek *in camera* treatment for a combined 973 documents—reducing the total request by 726 documents, and which is 57% of the original requests.

specific page and line numbers of deposition transcripts, lowered its request for the length of time of *in camera* treatment, and removed its current request for *in camera* treatment of the expert reports.

Ottobock, by and through its counsel, seeks *in camera* treatment for the remaining exhibits included in its original motion. These documents contain highly sensitive and proprietary information. Public disclosure of such information would result in Ottobock's competitors obtaining Ottobock's most sensitive and confidential business information, which, in the highly competitive market of prosthetic devices, would cause significant harm to Ottobock's competitive position. Accordingly, Ottobock respectfully requests an order requiring the designated materials to be used at the hearing only *in camera* and maintained under seal for a definite amount of time.

The documents, and portions thereof, for which Ottobock seeks *in camera* treatment, upon thorough review of Complaint Counsel's and Ottobock's own Exhibit Lists,<sup>3</sup> satisfy the requirements for *in camera* treatment as set forth in Rule 3.45 and the relevant decisions of the Federal Trade Commission. The information contained in the documents designated by Ottobock is "sufficiently secret and sufficiently material to [Ottobock's] business that disclosure would result in serious competitive injury." *In re General Foods Corp.*, 95 F.T.C. 352 (1980). Furthermore, this secret and material information warrants *in camera* treatment even when balanced against the "importance of the information in explaining the rationale of [the Commission's] decisions." *See id.*

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<sup>3</sup> Due to the Hold Separate and Asset Maintenance Agreement (the "Hold Separate Agreement"), attached hereto as Exhibit "D," Ottobock and FIH Group Holdings, LLC ("Freedom") have been held separate and apart. Accordingly, Freedom has been held separate and apart from Ottobock and has not reviewed any documents belonging to any Ottobock custodian.

The exhibits, and portions thereof, at issue in this motion are listed in the table attached as Exhibit “A” and copies of the exhibits are attached (in CD format) as Exhibit “B.” For ease of reference, Ottobock has grouped the exhibits identified in the Exhibit “A” table into the following eight categories:

1. Business Plans & Strategies;
2. Contract Negotiations and Customer Contracts;
3. Intellectual Property, Proprietary Information and Trade Secrets;
4. Customer-Specific Documents;
5. Pricing and Cost Information;
6. Market Analysis Documents;
7. Sales and Financial Information; and
8. Multiple Category Documents.

The public exposure of the identified exhibits would result in a clearly defined, serious injury to Ottobock. Ottobock’s motion for *in camera* treatment is fully supported by the sworn Declaration of Scott Schneider attached hereto as Exhibit “C”,<sup>4</sup> which analyzes each individual exhibit listed in Exhibit “A”.

## **I. INTRODUCTION**

On May 18, 2018, Complaint Counsel provided to Ottobock’s Counsel its Final Proposed Exhibit List pursuant to Administrative Law Judge D. Michael Chappell’s April 26, 2018 Fourth Revised Scheduling Order. Complaint Counsel’s Final Proposed Exhibit List included

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<sup>4</sup> Pursuant to the July 2nd Order, to make “a stronger case” for the confidentiality of these exhibits, Ottobock submits the declaration of Scott Schneider, an employee with the requisite knowledge of the company.

approximately 1,885 exhibits. Ottobock's Final Proposed Exhibit List was provided to Complaint Counsel on May 29, 2018, and included approximately 1,050 exhibits.

Ottobock has thoroughly reviewed each proposed exhibit that was identified by both Complaint Counsel and Ottobock to determine whether the confidential material included in the exhibits warrants *in camera* treatment. Ottobock is aware of the important consideration the Commission places on disclosure of information to explain the rationale of its decisions. Ottobock, however, is also aware that the Commission recognizes the need for parties (and nonparties) to protect confidential business information, the disclosure of which would result in serious competitive injury. *See OSF Healthcare Sys., A Corp., & Rockford Health Sys., A Corp.*, 2012 WL 1355598, at \*3 (F.T.C. Mar. 29, 2012). Accordingly, Ottobock has narrowly tailored its request for *in camera* treatment for only that information that is sufficiently secret and material to justify Judge Chappell's order granting *in camera* treatment for the identified exhibits. Ottobock has identified 451 exhibits that warrant *in camera* treatment.

## **II. ARGUMENT**

The Commission's Rules and precedent allow for *in camera* treatment of Ottobock's identified exhibits. Due to the highly sensitive and confidential nature of the identified exhibits, and the clearly defined, serious injury Ottobock will suffer if its contents became public, the identified exhibits should be granted *in camera* treatment.

### **A. Legal Standard**

Commission Rule 3.45(b) provides that the "Administrative Law Judge shall order that such material [set forth in a motion to obtain *in camera* treatment] be placed *in camera* only after finding that its public disclosure will likely result in a clearly defined, serious injury to the person, partnership, or corporation requesting *in camera* treatment." 16 C.F.R. § 3.45(b). A ruling on *in camera* treatment, "like other questions relating to the proper, fair, and expeditious

conduct of adjudicative hearings[,] is a matter within the sound discretion of the administrative law judge.” *In re Bristol-Myers Co.*, 90 F.T.C. 455, 457 (1977).

To demonstrate that *in camera* treatment is warranted, the movant must establish that the information is “sufficiently secret and sufficiently material to the [proponent’s] business that disclosure would result in serious competitive injury,” and then balance that factor against the “importance of the information in explaining the rationale of the [Commission’s] decisions.” *General Foods Corp.*, 95 F.T.C. at 352 (citing *Bristol-Myers Co.*, 90 F.T.C. at 455). In *Bristol Myers*, the Commission set forth six factors to weigh in considering whether information is sufficiently secret and material:

- (1) the extent to which the information is known outside of his business;
- (2) the extent to which it is known by employees and others involved in his business;
- (3) the extent of measures taken by him to guard the secrecy of the information;
- (4) the value of the information to him and to his competitors;
- (5) the amount of effort or money expended by him in developing the information;
- (6) the ease or difficulty with which the information could be properly acquired or duplicated by others.

*Bristol-Myers Co.*, 90 F.T.C. 455 (1977) (citing Restatement of Torts § 757, Comment b at 6 (1939)).

The Commission has previously “recognized that it may be appropriate to provide *in camera* treatment for business records to be introduced as evidence . . . , such as business strategies, marketing plans, pricing policies, or sales documents.” *In re OSF Healthcare Sys.*, 2012 WL 1355598, at \*3 (holding that such business records are typically afforded two to five years of *in camera* treatment). The Commission has previously held that the “likely loss of business advantages is a good example of a ‘clearly defined, serious injury.’” *In re Hoechst Marion Roussel, Inc.*, 2000 FTC LEXIS 138, \*6 (F.T.C. Sept. 19, 2000).

**B. Ottobock's Proposed Exhibits Subject to this Motion Meet the Standard for In Camera Treatment Because Their Public Disclosure Would Result in Serious, Clearly Defined Injury to Ottobock.**

For each of the categories of documents set forth by Ottobock, the information sought to be afforded *in camera* treatment is sufficiently secret and material, and the secrecy and materiality outweigh the importance of the information in explaining the rationale of the Commission's decision. *See General Foods Corp.*, 95 F.T.C. at 352. The Commission has previously recognized that the type of information contained within each of Ottobock's identified categories of documents deserve *in camera* treatment.

All six *Bristol Myers* factors support Ottobock's motion for *in camera* treatment. *First*, as a private company, none of the aforementioned information is known outside of Ottobock, aside from documents between Ottobock and contracting parties that is not otherwise publicly available. *Second*, the information contained in these documents is only disclosed to certain Ottobock employees on a need-to-know basis, or other parties that are in a contractual relationship with Ottobock. *Third*, Ottobock requires its employees to sign non-disclosure and confidentiality agreements to maintain the secrecy of this information. *Fourth*, the information at issue is highly secret and material, such that disclosure would result in serious injury to Ottobock and would be advantageous to Ottobock's competitors at Ottobock's expense. *Fifth*, Ottobock expends a great amount of time and resources into developing its business strategies, which are key to its competitive advantage. *Sixth*, it would be nearly impossible for a non-party to properly acquire or duplicate the information contained in the documents at issue because these documents were kept confidential by Ottobock.

Disclosure of the information that Ottobock seeks to protect would create a "likely loss of business advantage," resulting in a "clearly defined, serious injury." *See Hoechst Marion*

*Roussel, Inc.*, 2000 FTC LEXIS 138, at \*6. It is therefore both appropriate and proper for the Commission to grant *in camera* treatment to the exhibits identified by Ottobock.

As described in the attached Schneider Declaration, the documents at issue fall into seven distinct categories, with an eighth category containing documents that fall into multiple categories. The following chart lists each category of materials, the applicable paragraph discussing the category in the Schneider Declaration, and the time period for which Ottobock requests *in camera* treatment.

<u>Category of Confidential Information</u>	<u>Declaration</u>	<u>Time Period</u>
Business Plans and Strategies	¶ 8	5 Years
Contract Negotiations and Customer Contracts <ul style="list-style-type: none"> <li>• { <b>Redacted – Subject to Pending Motion for In Camera Treatment</b> }</li> </ul>	¶ 9 <ul style="list-style-type: none"> <li>• ¶ 9(a)</li> </ul>	5 Years <ul style="list-style-type: none"> <li>• 10 Years</li> </ul>
Intellectual Property, Proprietary Information and Trade Secrets	¶ 10	Indefinite
Customer-Specific Information	¶ 11	5 Years
Pricing and Cost Information	¶ 12	3 Years
Market Analysis Information	¶ 13	5 Years
Sales and Financial Information	¶ 14	5 Years

If a document falls within multiple categories, Ottobock requests that the category carrying the longest time period of *in camera* treatment apply.

1. *Business Plans and Strategies*

Ottobock seeks *in camera* treatment for documents containing business plans and strategies, including certain non-public documents related to the synergies and efficiencies expected from the acquisition of Freedom. This type of information has previously been held by

the Commission to deserve *in camera* treatment. *In re Union Oil Company of California*, 2004 WL 2458848, at \*3 (F.T.C. Oct. 7, 2004) (granting motion for *in camera* treatment of “business planning” information); *In re Champion Spark Plug Co.*, 1982 FTC LEXIS 85 (F.T.C. Apr. 5, 1982) (granting *in camera* treatment for documents containing “overall business plans and strategies” for five years). The disclosure of these documents would harm Ottobock by revealing Ottobock’s current and future business plans to competitors. This would allow competitors to take advantage of any weaknesses identified by Ottobock and to enact their own defensive plans to combat Ottobock’s plans. For example, Ottobock has produced many Board of Directors’ Presentations, which contain a wide variety of business plans for many of its different product lines. These plans would give any competitor insight into not only “what” Ottobock plans on doing in the future, but also “how” Ottobock makes its decisions for future business plans. It is this “what” and “how” of Ottobock’s business plans and strategies that has helped Ottobock become a successful prosthetic and orthotic device manufacturer. Accordingly, Ottobock requests that this information remain *in camera* for a period of five years. *See In the Matter of Tronox Ltd. A Corp*, 9377, 2018 WL 2336017, at \*1 (F.T.C. May 15, 2018) (granting *in camera* treatment for a period of ten years for documents containing respondent’s “business plans”).

2. *Contract Negotiations and Customer Contracts*

Additionally, Ottobock has identified certain documents containing contracts and negotiations with customers that are deserving of *in camera* treatment. Similar documents have previously been granted *in camera* treatment by the Commission. *OSF Healthcare Sys.*, 2012 WL 1355598, at \*3 (granting motion for *in camera* treatment for “contracts with [customers] and negotiations with [customers]”). Ottobock enjoys many different customer relationships, which include varying types of contracts with those customers. Disclosure of such information would

harm Ottobock's customer relationships and undermine Ottobock's ability to negotiate in the future. Further, competitors will be able to seize on this information and further disrupt Ottobock's relationships with its customers. Accordingly, Ottobock requests that this information remain *in camera* for a period of five years. *In re Evanston Nw. Healthcare Corp., & Enh Med. Grp., Inc.*, 2005 WL 1541539, at \*2 (F.T.C. June 1, 2005) (granting *in camera* treatment, for a period of ten years, for "information related to contract negotiations and rates").

a) { **Redacted – Subject to Pending Motion for In Camera Treatment** }

{ **Redacted – Subject to Pending Motion for In Camera Treatment** }, Ottobock requests that this information remain *in camera* for ten years.

3. *Intellectual Property, Proprietary Information and Trade Secrets*

Ottobock requests *in camera* treatment for documents containing intellectual property, proprietary information and trade secrets, such as highly confidential technical information created at great expense to produce Ottobock's prosthetic devices. Information that is "highly proprietary and sensitive" is sufficient grounds for extending *in camera* protection. *In re E.I. Dupont De Nemours & Co.*, 97 F.T.C. 116 (1981); *see also Union Oil Company of California*, 2004 WL 3142853, at \*1 (F.T.C. Nov. 22, 2004) (granting indefinite *in camera* treatment for "trade secrets, such as secret formulas, processes, and other secret technical information"). Accordingly, Ottobock requests that this information remain *in camera* indefinitely. *See In the Matter of Tronox Ltd. A Corp., et al, Respondents.*, 9377, 2018 WL 2336017, at \*1 (F.T.C. May 15, 2018) (granting indefinite *in camera* treatment for documents containing "trade secrets").

4. *Customer-Specific Information*

The Final Proposed Exhibit Lists contain documents setting forth customer-specific information, which has also been held by the Commission to be deserving of *in camera* treatment. *Polypore Int'l, Inc.*, 2009 WL 1499350, at \*4 (F.T.C. May 13, 2009) (granting *in*

*camera* treatment to “customer-specific documents”). Ottobock has developed relationships with many different customers over the years. { **Redacted – Subject to Pending Motion for In Camera Treatment** }. Accordingly, Ottobock requests that this highly sensitive information remain *in camera* for five years. *See In the Matter of Tronox Ltd. A Corp., et al, Respondents.*, 9377, 2018 WL 2336017, at \*1 (F.T.C. May 15, 2018) (granting *in camera* treatment for a period of ten years for “customer-specific price and volume information”).

5. Pricing and Cost Information

Documents containing pricing strategy and cost information have been granted *in camera* treatment because disclosure is likely to give unfair competitive advantages to competitors. *In re Mcwane, Inc., & Star Pipe Products, Ltd., A Ltd. P’ship*, 2012 WL 3862131, at \*3 (F.T.C. Aug. 17, 2012) (granting *in camera* treatment to documents containing “pricing and cost information”); *In re Polypore Int’l, Inc.*, 2009 WL 1499350, at \*4 (F.T.C. May 13, 2009) (granting *in camera* treatment to “costing data”); *In re E.I. Dupont De Nemours & Co.*, 97 F.T.C. 116 (1981) (granting *in camera* treatment to “certain lists of prices” because they would “assist its competitors if released”).

Ottobock seeks *in camera* treatment for documents containing generic price and cost information of its products, as opposed to the customer-specific information in Category Four (4). The disclosure of Ottobock’s prices and/or costs of its products would damage its relationship with its customers, undermine its negotiating power with customers, and assist competitors by providing them with vital information that Ottobock has thus far remained confidential. { **Redacted – Subject to Pending Motion for In Camera Treatment** }.

Accordingly, Ottobock requests that this information remain *in camera* for three years. *See In the Matter of Tronox Ltd. A Corp., et al, Respondents.*, 9377, 2018 WL 2336017, at \*1 (F.T.C.

May 15, 2018) (granting *in camera* treatment for a period of five years for “aggregated price and volume information”).

6. Market Analysis Documents

Ottobock seeks *in camera* treatment for documents containing market analysis, which have previously been granted *in camera* treatment by the Commission. *Polypore Int’l, Inc.*, 2009 WL 1499350, at \*4 (F.T.C. May 13, 2009) (granting *in camera* treatment to “market analysis” information); *Evanston Nw. Healthcare Corp., & Enh Med. Grp., Inc.*, 2005 WL 1541539, at \*2 (F.T.C. June 1, 2005) (granting *in camera* treatment to information including “market analysis”). Ottobock’s market analyses are commercially valuable to Ottobock’s competitors and customers, and are inherently material to its business. Ottobock’s market analyses are valuable to its competitive position in the market and provide an insight into Ottobock’s future plans to better compete in the market. For instance, Ottobock’s market analyses might describe an area of the market identified by Ottobock as a weakness or one that holds an opportunity to explore, of which a competitor can take advantage. The sensitivity of these documents is similar to that of Ottobock’s business plans, as they both provide insight into future plans and disclosure would allow a competitor to stymie Ottobock’s future growth. Accordingly, Ottobock requests that this information remain *in camera* for five years. *See In the Matter of Tronox Ltd. A Corp., et al, Respondents.*, 9377, 2018 WL 2336017, at \*1 (F.T.C. May 15, 2018) (granting *in camera* treatment for a period of ten years for documents containing respondent’s “business plans”).

7. Sales and Financial Information

Ottobock seeks *in camera* treatment for sales and financial information, which have also been granted *in camera* treatment by the Commission. *In re ECM Biofilms, Inc., A Corp., Also d/b/a Enviroplastics Int’l*, 2014 WL 3974607, at \*1 (F.T.C. Aug. 4, 2014) (granting *in camera*

treatment to “financial information”); *Champion Spark Plug Co.*, 1982 FTC LEXIS 85 (F.T.C. Apr. 5, 1982) (granting *in camera* treatment for documents containing “sales data” for five years). Ottobock’s sales data and financial information are commercially valuable to Ottobock’s competitors and customers, and are inherently material to its business. Disclosure of this information would undermine Ottobock’s negotiating power with customers and would allow competitors to obtain valuable insight into Ottobock’s business. For instance, some of Ottobock’s financial information contains narrow scopes of information on certain customers and/or certain sales representatives. Allowing competitors to view Ottobock’s weakest customers or best sales representatives could provide a competitor with an unfair advantage. Accordingly, Ottobock requests that this information remain *in camera* for ten years. *See In the Matter of Impax Labs., Inc.*, 2017 WL 4948988, at \*1 (F.T.C. Oct. 23, 2017) (granting *in camera* treatment for documents containing “financial and sales projections” for ten years).

8. *Multiple Categories*

In addition to the aforementioned documents, some proposed exhibits contain two or more types of information warranting *in camera* treatment. As stated above, for these documents, Ottobock seeks *in camera* treatment for the longer applicable period of time.

C. ***In Camera Treatment is Warranted for Certain Exhibits that are More Than Three Years Old.***

Pursuant to the July 2nd Order, Ottobock has substantially reduced the number of exhibits more than three years old, for which it seeks *in camera* treatment. Ottobock’s original motion contained 82 exhibits more than three years old; however, Ottobock has removed 65 exhibits—eliminating approximately 79% of those exhibits for which Ottobock originally sought *in camera* protection. The remaining exhibits contain information that remains competitively sensitive, including customer-specific pricing information that could be used against Ottobock in

future negotiations, as well as projections that proceed past 2018, which would provide competitors with an insight into Ottobock strategies moving forward. Such documents include pricing that was given to different customers, which could, to this day, still disrupt Ottobock's customer relationships if they found out they paid higher prices than other customers. *See* Ex. C, Schneider Decl.

**D. { Redacted – Subject to Pending Motion for In Camera Treatment }**

**{ Redacted – Subject to Pending Motion for In Camera Treatment }**

**E. In Camera Treatment is Also Warranted for Possible Trial Testimony by Ottobock's Witnesses.**

Both Respondent and Complaint Counsel have designated several Ottobock employees as potential trial witnesses. If called upon, it is likely that Ottobock's employees will be questioned about the topics covered by this motion. Testimony on any of these topics could result in the disclosure of the same information contained in the documents described above. Accordingly, Ottobock requests that any trial testimony, either upon direct examination or cross examination by either party on any of these topics, be subject to *in camera* treatment for a period of three (3) to five (5) years from the date of this motion.

**F. Pursuant to the July 2nd Order, Ottobock Will Prepare an In Camera Version of its Expert Reports Based on the Outcome of the Pending Motions for In Camera Treatment.**

In the July 2nd Order, Judge Chappell held that only "once the orders on pending *in camera* treatment motions are issued, the parties shall prepare two versions of their expert reports." Accordingly, Ottobock does not include the expert reports in its Motion, but reserves the right to prepare *in camera* versions of the expert reports once the orders on pending *in camera* motions are issued.

**III. CONCLUSION**

For the foregoing reasons, and those contained in the Declaration of Scott Schneider, Ottobock respectfully requests that this Court grant *in camera* protection to all documents identified in Exhibit “A” and any trial testimony pertaining to the information contained in the documents in Exhibit “A”.

Dated: July 23, 2018

Respectfully submitted,

/s/ Andrew J. Rudowitz

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**UNITED STATES OF AMERICA  
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**PUBLIC**

**PROPOSED ORDER**

Upon consideration of Ottobock’s Second Motion for *In Camera* Treatment of Certain Trial Exhibits (the “Motion”), any opposition thereto, any hearing thereon, and the entire record in this proceeding,

IT IS HEREBY ORDERED, that Ottobock’s Motion is GRANTED.

IT IS FURTHER ORDERED, that pursuant to Rule 3.45(b) of the Federal Trade Commission Rules of Practice, 16 C.F.R. § 3.45(b), the documents identified in the index attached as Exhibit A to the Motion, and any related trial testimony, shall be subject to the requested *in camera* treatment and will be kept confidential and not placed on the public record of this proceeding.

Date: \_\_\_\_\_

\_\_\_\_\_  
D. Michael Chappell  
Administrative Law Judge

**EXHIBIT A**

**PUBLIC**

<b>Exhibit Number</b>	<b>Trial Exhibit Date</b>	<b>Document Range</b>	<b>Trial Exhibit Description</b>	<b>In Camera Treatment</b>	<b>Party With Confidential Information</b>	<b>Complete vs. Partial In Camera Treatment</b>	<b>In Camera Designations for Deposition Transcripts</b>	<b>Duration of In Camera Treatment</b>
PX00753	12/1/2017	{REDACTED}	{REDACTED}	Sales and Financial Information	Ottobock	Complete		5 Years
PX00818	3/23/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Freedom	Complete		5 Years
PX00819	7/10/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Freedom	Complete		Indefinite
PX00826	12/6/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX00827	8/16/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite
PX00830		{REDACTED}	{REDACTED}	Customer-Specific Documents	Freedom	Complete		5 Years
PX00831		{REDACTED}	{REDACTED}	Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
PX00841	1/1/2018	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX00842		{REDACTED}	{REDACTED}	Sales and Financial Information	Ottobock	Complete		5 Years
PX00843		{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information;	Ottobock	Complete		5 Years
PX00844	8/16/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Ottobock	Complete		Indefinite
PX00856	10/26/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX00867	12/11/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX00869	1/29/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
PX00870	4/21/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX00871	7/10/2017	{REDACTED}	{REDACTED}	Market Analysis Documents	Ottobock	Complete		5 Years
PX00872	5/3/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX00884	12/5/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information;	Freedom & Ottobock	Complete		Indefinite
PX00885	12/6/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information;	Ottobock	Complete		Indefinite
PX00886	12/5/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX00887	12/5/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX00888	12/6/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX00889	11/2/2017	{REDACTED}	{REDACTED}	Pricing and Cost Information	Ottobock	Complete		5 Years
PX00890	9/5/2017	{REDACTED}	{REDACTED}	Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01054	10/11/2017	{REDACTED}	{REDACTED}	Market Analysis Documents	Ottobock	Partial (pp. 1-		5 Years
PX01055	8/30/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
PX01056	8/18/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01058	4/8/2015	{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01059	9/28/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
PX01060	9/22/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom & Ottobock	Complete		Indefinite
PX01062	10/16/2017	{REDACTED}	{REDACTED}	Customer-Specific Documents; Market Analysis Documents; Pricing and Cost Information	Ottobock	Partial (pp. 4-6)		5 Years
PX01065	12/10/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years

<b>Exhibit Number</b>	<b>Trial Exhibit Date</b>	<b>Document Range</b>	<b>Trial Exhibit Description</b>	<b>In Camera Treatment</b>	<b>Party With Confidential Information</b>	<b>Complete vs. Partial In Camera Treatment</b>	<b>In Camera Designations for Deposition Transcripts</b>	<b>Duration of In Camera Treatment</b>
PX01066	8/21/2017	{REDACTED}	{REDACTED}	Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01070	9/20/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom & Ottobock	Complete	2, 4	Indefinite
PX01083	10/27/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Freedom & Ottobock	Complete		5 Years
PX01084	10/5/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Freedom & Ottobock	Complete		5 Years
PX01085	10/4/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Partial (pp. 4,		5 Years
PX01086	9/22/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Freedom & Ottobock	Complete		Indefinite
PX01088	8/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01091	8/25/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01097	7/25/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01098	4/11/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01099	8/21/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
PX01256	2/9/2017	{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information;	Ottobock	Complete		5 Years
PX01259	6/29/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information;	Ottobock	Complete		5 Years
PX01260	9/12/2016	{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01261	5/10/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Market Analysis Documents; Sales and Financial Information;	Ottobock	Complete		5 Years
PX01262	10/27/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Market Analysis Documents; Sales and Financial Information;	Ottobock	Complete		5 Years
PX01263	10/19/2017	{REDACTED}	{REDACTED}	Customer-Specific Documents; Market Analysis Documents; Sales and Financial Information;	Ottobock	Complete		5 Years
PX01264	10/4/2017	{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information;	Ottobock	Complete		5 Years
PX01265	10/3/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Partial (pp. 1-2)		5 Years
PX01266	10/27/2017	{REDACTED}	{REDACTED}	Market Analysis Documents; Sales and Financial Information;	Freedom & Ottobock	Complete		5 Years
PX01277	11/16/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
PX01278	10/12/2016	{REDACTED}	{REDACTED}	Customer-Specific Documents; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01279	2/23/2017	{REDACTED}	{REDACTED}	Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
PX01282		{REDACTED}	{REDACTED}	Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01284	9/19/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
PX01296	8/25/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01297	8/31/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Ottobock	Partial (pp. 13-125)		Indefinite
PX01299	8/16/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
PX01300	8/15/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
PX01301		{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Freedom & Ottobock	Complete		Indefinite
PX01303	11/10/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Freedom & Ottobock	Complete		Indefinite
PX01304	11/14/2017	{REDACTED}	{REDACTED}	Market Analysis Documents	Freedom & Ottobock	Complete		5 Years
PX01305	9/28/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Freedom & Ottobock	Complete		Indefinite
PX01307	12/14/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Complete		5 Years
PX01308	1/15/2018	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		Indefinite
PX01323		{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01324	1/27/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01330		{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Partial (pp. 6-8)		5 Years
PX01334	3/29/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01336	11/3/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
PX01339	10/5/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Partial (pp. 2-4)		5 Years
PX01347	2/17/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Contract Negotiations and	Ottobock	Complete		5 Years
PX01350	6/30/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
PX01351	3/25/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01352	6/30/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01353	3/1/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Freedom & Ottobock	Complete		Indefinite
PX01354	10/22/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Ottobock	Complete		Indefinite
PX01355	10/28/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
PX01358	8/31/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Ottobock	Complete		Indefinite
PX01360	11/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
PX01362	8/28/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Complete		5 Years
PX01363	8/25/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Partial (p. 1)		5 Years
PX01364	11/14/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Freedom & Ottobock	Complete		5 Years
PX01365	3/30/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Partial (p. 4)		5 Years

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PX01366	10/23/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01370	5/16/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Freedom & Ottobock	Complete		Indefinite
PX01372	9/20/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
PX01373		{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Ottobock	Complete		Indefinite
PX01374		{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01376	9/11/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
PX01378	3/18/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01379	11/9/2017	{REDACTED}	{REDACTED}	Contract Negotiations and Customer Contracts; Customer-	Ottobock	Complete		5 Years
PX01384	8/23/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
PX01387	12/6/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX01403		{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01405	12/11/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Sales and Financial Information	Freedom & Ottobock	Complete		Indefinite
PX01410	7/10/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Freedom	Complete		Indefinite

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PX01437	11/14/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
PX01438	10/1/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Complete		5 Years
PX01448	12/6/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01456	8/18/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Complete		5 Years
PX01457	12/12/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01462	8/25/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
PX01463	10/16/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01464	8/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX01465	8/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX01467	11/10/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Partial (p. 2)		5 Years
PX01469	1/6/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01470	8/27/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01472	10/30/2017	{REDACTED}	{REDACTED}	Customer-Specific Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01474	10/6/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
PX01478	8/16/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01479	8/17/2017	{REDACTED}	{REDACTED}	Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01496	6/1/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01498	8/3/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
PX01504	11/15/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01507	10/2/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01510	8/1/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01511	8/27/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX01512	11/15/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Complete		5 Years
PX01514	12/1/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01515	9/20/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX01520	12/3/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Complete		5 Years
PX01521	1/24/2018	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01522	2/13/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01531	11/20/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Ottobock	Complete		Indefinite
PX01532	7/21/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Ottobock	Complete		Indefinite
PX01533	8/16/2017	{REDACTED}	{REDACTED}	Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years

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PX01534	11/30/2016	{REDACTED}	{REDACTED}	Customer-Specific Documents; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01538	1/24/2018	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01539	1/10/2028	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01540	2/6/2018	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
PX01541	2/24/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01542	12/4/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
PX01543	9/30/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
PX01544	1/10/2018	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01545	1/11/2018	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01546	1/26/2018	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
PX01547	9/7/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
PX01551	8/27/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01552	8/22/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Complete		5 Years
PX01553	4/28/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years

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PX01554	11/2/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01555	8/31/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX01556	10/10/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Freedom & Ottobock	Complete		5 Years
PX01559	8/25/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX01560	9/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Freedom & Ottobock	Complete		5 Years
PX01561	11/10/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01563	8/21/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information;	Ottobock	Complete		Indefinite
PX01564	8/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
PX01565	8/28/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
PX01572	3/26/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents	Ottobock	Complete		5 Years
PX01573	3/4/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01575	12/1/2016	{REDACTED}	{REDACTED}	Contract Negotiations and Customer Contracts; Sales and	Ottobock	Complete		5 Years
PX01576	3/3/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01577	11/10/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01578	6/5/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Ottobock	Complete		5 Years

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PX01584	2/8/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Complete		5 Years
PX01585	12/21/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Ottobock	Complete		Indefinite
PX01590	7/10/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Complete		5 Years
PX01592	5/19/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
PX01595	4/17/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01596	11/30/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
PX01597		{REDACTED}	{REDACTED}	Sales and Financial Information	Ottobock	Complete		5 Years
PX01598		{REDACTED}	{REDACTED}	Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01600		{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01602	9/7/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX01603	11/3/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Complete		5 Years
PX01607	9/24/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Ottobock	Complete		Indefinite
PX01608		{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX01609	5/11/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01614	9/22/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Ottobock	Complete		Indefinite
PX01615	8/18/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite

<b>Exhibit Number</b>	<b>Trial Exhibit Date</b>	<b>Document Range</b>	<b>Trial Exhibit Description</b>	<b>In Camera Treatment</b>	<b>Party With Confidential Information</b>	<b>Complete vs. Partial In Camera Treatment</b>	<b>In Camera Designations for Deposition Transcripts</b>	<b>Duration of In Camera Treatment</b>
PX01616	8/25/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX01617	11/16/2015	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX01618	3/10/2016	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Ottobock	Complete		Indefinite
PX01619	9/6/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01621	12/12/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Market Analysis Documents;	Ottobock	Complete		5 Years
PX01622	10/5/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Freedom & Ottobock	Complete		5 Years
PX01623	7/25/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Contract Negotiations and Customer Contracts; Sales and	Freedom & Ottobock	Complete		5 Years
PX01624	6/17/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01626	2/16/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01627	9/28/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01628	8/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01629	9/28/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01630	9/27/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Freedom & Ottobock	Complete		5 Years
PX01631	9/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01632	10/2/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01633	10/11/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX01634	8/16/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01635	8/17/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
PX01636	6/17/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01637	12/1/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
PX01638	10/24/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
PX01639	1/1/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Freedom & Ottobock	Complete		5 Years
PX01640	11/9/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Complete		5 Years
PX01703		{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Ottobock	Complete		Indefinite
PX01704	1/10/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
PX01709	11/6/2017	{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01718	11/16/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
PX01720	7/4/2017	{REDACTED}	{REDACTED}	Customer-Specific Documents; Sales and Financial Information	Ottobock	Complete		5 Years

<b>Exhibit Number</b>	<b>Trial Exhibit Date</b>	<b>Document Range</b>	<b>Trial Exhibit Description</b>	<b>In Camera Treatment</b>	<b>Party With Confidential Information</b>	<b>Complete vs. Partial In Camera Treatment</b>	<b>In Camera Designations for Deposition Transcripts</b>	<b>Duration of In Camera Treatment</b>
PX01730	6/14/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01735	9/29/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
PX01743		{REDACTED}	{REDACTED}	Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Freedom & Ottobock	Complete		Indefinite
PX01751	11/7/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01752	1/18/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Ottobock	Complete		Indefinite
PX01754	7/7/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Ottobock	Complete		Indefinite
PX01755	11/16/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01756		{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01760	9/7/2017	{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information	Freedom & Ottobock	Complete		5 Years
PX01761	10/9/2017	{REDACTED}	{REDACTED}	Pricing and Cost Information	Ottobock	Complete		5 Years
PX01762	1/29/2018	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Ottobock	Complete		Indefinite
PX01763	1/24/2018	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		Indefinite
PX01854	8/28/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01857	3/28/2016	{REDACTED}	{REDACTED}	Contract Negotiations and Customer Contracts; Customer-Specific Documents; Pricing and	Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01858	5/19/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01859	6/2/2016	{REDACTED}	{REDACTED}	Customer-Specific Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01860	3/7/2017	{REDACTED}	{REDACTED}	Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01862	3/1/2016	{REDACTED}	{REDACTED}	Contract Negotiations and Customer Contracts; Customer-Specific Documents; Sales and	Ottobock	Complete		5 Years
PX01871	4/24/2015	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		Indefinite
PX01878	6/20/2016	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Ottobock	Complete		Indefinite
PX01879		{REDACTED}	{REDACTED}	Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01887	9/24/2015	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		Indefinite
PX01890	12/23/2016	{REDACTED}	{REDACTED}	Customer-Specific Documents; Market Analysis Documents	Ottobock	Complete		5 Years
PX01891	11/30/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
PX01892	10/21/2016	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Ottobock	Complete		Indefinite
PX01896	2/9/2018	{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01897	2/8/2018	{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01900	8/18/2017	{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01902	1/17/2016	{REDACTED}	{REDACTED}	Pricing and Cost Information	Ottobock	Complete		5 Years
PX01903	8/1/2017	{REDACTED}	{REDACTED}	Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01904		{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01910		{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01914	10/15/2016	{REDACTED}	{REDACTED}	Customer-Specific Documents; Market Analysis Documents	Ottobock	Complete		5 Years
PX01916	11/10/2017	{REDACTED}	{REDACTED}	Customer-Specific Documents; Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
PX01917	8/22/2017	{REDACTED}	{REDACTED}	Pricing and Cost Information	Ottobock	Complete		5 Years
PX01919	11/7/2017	{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01920	8/28/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Freedom & Ottobock	Complete		Indefinite
PX01922	1/6/2016	{REDACTED}	{REDACTED}	Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01923	6/30/2017	{REDACTED}	{REDACTED}	Sales and Financial Information	Freedom	Complete		5 Years
PX01924	6/30/2017	{REDACTED}	{REDACTED}	Pricing and Cost Information	Freedom	Complete		3 Years
PX01925	9/19/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01926		{REDACTED}	{REDACTED}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01927		{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01928		{REDACTED}	{REDACTED}	Contract Negotiations and Customer Contracts; Market	Ottobock	Complete		5 Years
PX01929		{REDACTED}	{REDACTED}	Customer-Specific Documents; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01930		{REDACTED}	{REDACTED}	Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
PX01931	7/1/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom & Ottobock	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01932		{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01933	12/6/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX02014	8/31/2017 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Contract Negotiations and	Ottobock	Complete		5 Years
PX02113	10/17/2016 0:00	{REDACTED}	{REDACTED}	Contract Negotiations and Customer Contracts;	Freedom & Ottobock	Complete		5 Years
PX02115	8/31/2017 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information;	Ottobock	Complete		5 Years
PX02120	5/27/2017 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information;	Freedom & Ottobock	Complete		5 Years
PX03002	2/1/2017 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information;	Freedom & Ottobock	Complete		5 Years
PX03111	5/1/2015 0:00	{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information; ;	Freedom & Ottobock	Complete		5 Years
PX03113	11/29/2017 0:00	{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX03114	6/1/2017 0:00	{REDACTED}	{REDACTED}	Pricing and Cost Information; ;	Freedom & Ottobock	Complete		3 Years
PX03116	12/13/2016 0:00	{REDACTED}	{REDACTED}	Pricing and Cost Information	Freedom & Ottobock	Complete		3 Years
PX03118	8/19/2016 0:00	{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information;	Ottobock	Complete		5 Years
PX03170	1/1/2015 0:00	{REDACTED}	{REDACTED}	Pricing and Cost Information	Freedom & Ottobock	Complete		3 Years
PX03185	12/15/2017 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Complete		5 Years
PX03186	2/25/2018 0:00	{REDACTED}	{REDACTED}	<b>Contract Negotiations and Customer Contracts</b> {REDACTED};	Ottobock	Complete		10 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX03189	2/19/2018 0:00	{REDACTED}	{REDACTED}	Contract Negotiations and Customer Contracts {REDACTED}	Freedom & Ottobock	Complete		10 Years
PX03215		{REDACTED}	{REDACTED}	Business Plans & Strategies;	Ottobock	Complete		5 Years
PX03216	11/14/2017 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies;	Ottobock	Complete		5 Years
PX05010	12/7/2017 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	15: 6 - 16: 21, 21:7-23, 28:23-29:3, 37:2-4, 37: 17 - 20, 41: 15 - 42: 1, 42: 20 - 43: 13, 43:15 - 25 44: 19 - 22 56: 17 - 58:9, 61:9-63: 9, 78:12-24 79: 23 - 80:6 80:25-82:20 82:25-83:16 94:17-95: 8 95:20-22 96: 24 -97:2 97:24-98: 6, 99:7-11 101: 3 - 103: 6 103:18 - 106: 21 114: 13 - 115: 13 118: 10 - 25 119:4-11 121:4-122:19 125:9-128: 7	5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05101	1/30/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	22: 21 - 22 23: 7 - 16 26: 17 - 27: 21 28: 9 - 19 33: 5 - 34: 3 35: 18 - 22, 38: 11 - 20 40: 23 - 41: 18 43: 24 - 44: 23 46: 10 - 47: 12 47: 21 - 48: 20 49: 4 - 50: 25 59: 11 - 21 60: 15 - 61: 5 71: 17 - 72: 4 72: 22 - 76: 10 78: 7 - 79: 3 81: 1 - 9, 95: 15 - 97: 11, 99: 2 - 100: 19 101: 11 - 19, 105: 2 - 106: 1, 106: 14 - 107: 22, 112: 21 - 113: 9 124: 12 - 126: 23, 129: 9 - 130: 8 130: 24 - 132: 15	5 Years
PX05102	1/31/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05104	2/8/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	23: 20 - 24: 16 24: 24: 17 - 27: 2 27: 3 - 8, 28:17-29: 2 29: 24 - 30: 13 30: 14 - 32: 4 33: 8 - 37:10 39: 10 - 43: 23 46: 4 - 50: 23 51: 6 - 53: 17 54: 6 - 55: 11 56: 1 - 20, 57: 2 - 11 57: 19 - 61: 12 61: 13 - 19 63: 3 - 67: 20 69: 6 - 71: 18 79: 22 - 81: 17 82: 24 - 86: 19 90:1- 92:14, 93:13 - 94: 6, 96: 4 - 10 105:1-109:20, 111:24- 112: 17 116: 4 - 121: 19 128: 18 - 131: 23 133: 9 - 134: 20 140: 21 - 144:16 146: 1 - 147: 4 148: 6 - 150: 19 154: 16-161: 4	5 Years
PX05106	3/6/2018 0:00	{REDACTED}	{REDACTED}	<b>Contract Negotiations and Customer Contracts</b> {REDACTED}	Ottobock & Freedom	Complete		10 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05123	3/22/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	9:15-10:5, 10:12-11:1 13:21-14:17, 15:17-16:21, 17:2-7, 17:16-18:20, 19:7-12, 28:10-20, 34:24-35:8, 36:8-37:12, 40:3-22, 41:1-42:8, 42:19-22, 43:8-44:2, 46:2-47:2, 52:13-53:23, 54:12-56:23, 58:22-60:17, 65:10 - 67:4, 68:24 – 69:15, 71:13 – 72:9, 76:8 – 78:18, 79:13-80:5, 84:17-85:18, 87:6-20, 88:23-89:10, 91:21-92:4, 92:23-93:10, 95:20-97:4, 105:4-106:1, 107:11-108:14, 110:23-	5 Years
PX05125	3/23/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	105:19 - 106:22, 165:22 - 166:16, 178:5 - 180:19	5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05127	3/27/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	39: 1 - 25, 54: 1 - 57: 1 58: 1 - 60:25 61: 1 - 68: 25 69: 1 - 76: 25 77: 1 - 78: 25 104: 1 - 107: 25 110: 1 - 25 181: 1 - 185: 25 210: 1 - 25 213: 1 - 25 220: 1 - 25 221: 1 - 25 240: 1 - 247: 25 276: 1 - 294: 25 300: 1 - 304: 25	5 Years
PX05130	3/28/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	171:13 - 172:12, 191:5 – 7, 199:22 - 200:16, 216:14 - 217:6	5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05131	3/28/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	9:1 - 31:5, 31:6– 15, 31:19 -32:22, 33:20 -34:23, 37:5 – 10, 42:2 - 43:24, 45:5 - 48:8, 50:11 - 51:8, 58:19 - 59:5, 70:21 – 23, 72:10- 16, 73:8 – 20, 78:18 - 81:24, 84:23 - 85:22, 87:22 - 88:7, 88:8 - 90:22, 91:17 - 92:6, 92:23 - 93:7, 95:6 - 96:14, 96:15 - 97:20, 98:14 - 99:1, 99:11 - 100:3, 100:4 – 14, 101:15 - 103:14, 105:14 - 110:20, 110:21 - 111:16	5 Years
PX05133	3/29/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	22: 22 - 23: 12, 61: 13 - 62: 6, 64: 2 – 15, 70: 8 – 24, 79: 15 - 82: 1, 96: 14 - 98: 15, 105: 18 - 108: 9, 119: 6 - 123: 13, 126: 25 - 128: 18, 129: 25 - 132: 9	5 Years
PX05139	3/30/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05148	4/3/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	31:1-25, 56:1-25, 60:1-61:25, 64:1-68:25, 79:1-25, 99:1-104:25, 111:1-115:25, 121:1-123:25, 127:1-25, 132:1-142:25, 147:1-149:25, 153:1-154:25, 160:1-162:25, 167:1-168:25, 177:1-179:25, 184:1-25, 187:1-190:25, 193:1-202:25	5 Years
PX05150	4/4/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	153:8 – 23, 154:19 - 155:15, 160:2 - 169:19, 170:19 - 172:24, 177:24 - 179:23, 180:3 – 13, 183:11 - 184:15, 184:16 - 20	5 Years
PX05152	4/4/2018 0:00	{REDACTED}	{REDACTED}	<b>Contract Negotiations and Customer Contracts</b> {REDACTED}	Freedom	Complete		10 Years
PX05154	4/5/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	66: 22 – 25, 67: 1 – 25, 69: 1 - 72: 9, 76: 24 - 79: 24	5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05155	4/5/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	21: 11 - 27: 25, 28: 1 - 37: 25, 41: 5 - 42: 10, 44: 21 - 58: 1, 68: 2 - 69: 6, 77: 12 - 24, 78: 24 - 79: 12	5 Years
PX05156	4/5/2018 0:00	{REDACTED}	{REDACTED}	<b>Contract Negotiations and Customer Contracts</b> {REDACTED}	Freedom	Complete		10 Years
PX05157	4/5/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	19: 25 - 20: 21, 85: 25 - 86: 7, 86: 8 - 18, 91: 11 - 25, 92: 23 - 93: 10, 93: 24 - 94: 11, 100: 16 - 101: 22, 104: 19 - 110: 11, 112: 15 - 121: 14, 121: 15 - 18, 125: 18 - 126: 24, 131: 18 - 132: 2, 138: 9 - 145: 11, 147: 23 - 150: 24, 160: 10 - 161: 6, 165: 2 - 166: 25, 172: 1 - 25, 174: 13 - 176: 15, 176: 25 - 179: 25	5 Years
PX05159	4/6/2018 0:00	{REDACTED}	{REDACTED}	<b>Contract Negotiations and Customer Contracts</b> {REDACTED}	Freedom	Complete		10 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05162	4/6/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	106: 2 - 25 107: 1 - 25 109: 20 - 25 113: 10 - 15 141: 1 - 25 150: 20 - 151: 15 151: 25 - 152: 25 153: 12 - 154: 22 154: 23 - 157: 14	5 Years
PX05163	4/6/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom & Ottobock	Partial	39:12-40:5, 58:1-16, 74:8-75:4, 84:8-86:25, 87:23-89:3, 90:8-110:2, 117:1-121:25, 124:10-133:25, 139:5-140:17, 147:19-151:3, 165:12-166:25, 181:12-182:4, 189:25-194:20, 196:13-197:12	5 Years
RX-0015 OB0001313		{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information	Freedom	Complete		Indefinite
RX-0017 OB0001314		{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0040	3/18/2015	{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0042 OB0035703		{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Market Analysis Documents	Ottobock	Complete		5 Years
RX-0048	4/8/2015	{REDACTED}	{REDACTED}	Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0049	4/8/2015	{REDACTED}	{REDACTED}	Market Analysis Documents	Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0067	7/1/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Ottobock	Complete		Indefinite
RX-0078	8/13/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Ottobock	Complete		Indefinite
RX-0079	8/14/2015	{REDACTED}	{REDACTED}	Customer-Specific Documents; Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0080	8/14/2015	{REDACTED}	{REDACTED}	Customer-Specific Documents; Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0097	10/19/2015	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Ottobock	Complete		Indefinite
RX-0111	12/10/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0120	1/1/2016 0:00	{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information; ;	Freedom & Ottobock	Complete		5 Years
RX-0121	1/1/2016 0:00	{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information; ;	Freedom & Ottobock	Complete		5 Years
RX-0122	11/18/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Ottobock	Complete		Indefinite
RX-0126	1/23/2016	{REDACTED}	{REDACTED}	Market Analysis Documents	Ottobock	Complete		5 Years
RX-0128	1/26/2016	{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0170	3/25/2016	{REDACTED}	{REDACTED}	Market Analysis Documents	Ottobock	Complete		5 Years
RX-0173 OB0488316		{REDACTED}	{REDACTED}	Market Analysis Documents	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0174	3/8/2018	{REDACTED}	{REDACTED}	<b>Contract Negotiations and Customer Contracts</b> {REDACTED}; <b>Sales and Financial Information</b>	Freedom & Ottobock	Complete		10 Years
RX-0176	4/5/2016	{REDACTED}	{REDACTED}	Market Analysis Documents	Ottobock	Complete		5 Years
RX-0183	4/13/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0190	4/21/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0217	5/27/2016	{REDACTED}	{REDACTED}	Customer-Specific Documents; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0230	6/16/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0239	7/8/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
RX-0240 OB0339317		{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
RX-0245	3/26/2018	{REDACTED}	{REDACTED}	<b>Business Plans &amp; Strategies;</b> <b>Pricing and Cost Information;</b> <b>Sales and Financial Information;</b> <b>Contract Negotiations and Customer</b>	Freedom & Ottobock	Complete		10 Years
RX-0246	7/18/2016	{REDACTED}	{REDACTED}	Contract Negotiations and Customer Contracts; Customer-	Ottobock	Complete		5 Years
RX-0248	4/2/2018	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
RX-0252	7/27/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
RX-0253	7/29/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents	Freedom	Complete		5 Years
RX-0255	4/2/2018	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
RX-0257	8/3/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years

<b>Exhibit Number</b>	<b>Trial Exhibit Date</b>	<b>Document Range</b>	<b>Trial Exhibit Description</b>	<b>In Camera Treatment</b>	<b>Party With Confidential Information</b>	<b>Complete vs. Partial In Camera Treatment</b>	<b>In Camera Designations for Deposition Transcripts</b>	<b>Duration of In Camera Treatment</b>
RX-0269	8/25/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
RX-0270	8/26/2016 0:00	{REDACTED}	{REDACTED}	Pricing and Cost Information;	Ottobock	Complete		5 Years
RX-0291	9/29/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0300	10/7/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
RX-0304	10/17/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom	Partial, 1-5		5 Years
RX-0317	11/2/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Freedom	Complete		Indefinite
RX-0321	11/16/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Ottobock	Complete		Indefinite
RX-0322	11/16/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Ottobock	Complete		Indefinite
RX-0323	11/16/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Ottobock	Complete		Indefinite
RX-0324	11/20/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0325	11/21/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Ottobock	Complete		Indefinite
RX-0327	11/30/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies	Freedom	Complete		5 Years
RX-0328	11/30/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0330	3/27/2018	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0333	12/5/2016	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0338	12/21/2016	{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0360 OB0001315		{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0374	2/23/2017	{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0379	3/15/2017	{REDACTED}	{REDACTED}	Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0381	3/16/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Freedom	Complete		Indefinite
RX-0387	3/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information;	Freedom & Ottobock	Complete		Indefinite
RX-0388	3/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information;	Freedom & Ottobock	Complete		Indefinite
RX-0389	3/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0393	3/31/2017 0:00	{REDACTED}	{REDACTED}	Pricing and Cost Information;	Ottobock	Complete		5 Years
RX-0423	5/12/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0424	5/12/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Customer-Specific Documents; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0434	6/1/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Freedom	Complete		Indefinite
RX-0443 OB0485191		{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom	Complete		Indefinite
RX-0453	7/7/2017 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Contract Negotiations and	Freedom & Ottobock	Complete		5 Years
RX-0456	7/11/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0468	7/21/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0471	7/25/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Freedom	Partial (p.2)		5 Years
RX-0473	7/25/2017	{REDACTED}	{REDACTED}	Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0477	7/28/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
RX-0479	8/1/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Ottobock	Complete		Indefinite
RX-0499	8/14/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information;	Freedom	Complete		Indefinite
RX-0502	8/16/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
RX-0514	8/22/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0516	8/22/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
RX-0519	8/23/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0520	8/24/2017	{REDACTED}	{REDACTED}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0521 OB0058672		{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Freedom	Complete		Indefinite
RX-0523	8/25/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Ottobock	Complete		5 Years
RX-0524	8/25/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
RX-0525	8/25/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
RX-0530	8/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information;	Ottobock	Complete		Indefinite
RX-0538	9/11/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0539	9/12/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
RX-0548	9/22/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
RX-0551	9/25/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom & Ottobock	Complete		Indefinite
RX-0561	9/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
RX-0562	9/29/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0568	10/1/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0569	10/1/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents;	Ottobock	Complete		Indefinite
RX-0570	10/1/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies	Freedom & Ottobock	Complete		5 Years
RX-0575	6/29/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information	Freedom & Ottobock	Complete		Indefinite
RX-0578 OB0001312		{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Ottobock	Complete		Indefinite
RX-0584	12/10/2015	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
RX-0585	10/5/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0586	10/5/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0587	10/5/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0588	10/5/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0589	10/5/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0590	10/5/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0591	10/5/2017	{REDACTED}	{REDACTED}	Sales and Financial Information	Ottobock	Complete		5 Years
RX-0596 OB0000553		{REDACTED}	{REDACTED}	Customer-Specific Documents; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0604	10/17/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0608	9/19/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom & Ottobock	Complete		Indefinite
RX-0616	10/27/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Contract Negotiations and	Ottobock	Complete		5 Years
RX-0635 ATK-	11/6/2017 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies	Freedom & Ottobock	Complete		5 Years
RX-0636	11/7/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Ottobock	Complete		Indefinite
RX-0642	11/10/2017	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0643	11/7/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information;	Freedom & Ottobock	Complete		Indefinite
RX-0654	11/14/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
RX-0655	11/14/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
RX-0656	11/14/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Ottobock	Complete		5 Years
RX-0658	11/14/2017 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information;	Freedom & Ottobock	Complete		5 Years
RX-0665	11/17/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
RX-0668	11/21/2017	{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0682	8/2/2016	{REDACTED}	{REDACTED}	Contract Negotiations and Customer Contracts; Customer-Specific Documents; Pricing and	Ottobock	Complete		5 Years
RX-0683	8/1/2016	{REDACTED}	{REDACTED}	Contract Negotiations and Customer Contracts; Customer-Specific Documents; Pricing and	Ottobock	Complete		5 Years
RX-0684 OB0010399		{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information	Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0685 OB0010400		{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
RX-0686 OB0010401		{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
RX-0687	8/1/2016	{REDACTED}	{REDACTED}	Contract Negotiations and Customer Contracts; Customer-Specific Documents; Pricing and Sales and Financial Information	Ottobock	Complete		5 Years
RX-0688 OB0010320		{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0691 OB0010462		{REDACTED}	{REDACTED}	Customer-Specific Documents	Ottobock	Complete		5 Years
RX-0692 OB0010321		{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0693 OB0010325		{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0695 OB0010322		{REDACTED}	{REDACTED}	Customer-Specific Documents	Ottobock	Complete		5 Years
RX-0696 OB0010324		{REDACTED}	{REDACTED}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0698 OB0010323		{REDACTED}	{REDACTED}	Business Plans & Strategies	Ottobock	Complete		5 Years
RX-0700 OB0010328		{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		5 Years
RX-0718	8/25/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information;	Freedom & Ottobock	Complete		Indefinite
RX-0719	8/10/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom & Ottobock	Complete		Indefinite
RX-0720	9/13/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
RX-0724 ATK- SDT00575	12/8/2017 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Contract Negotiations and Customer Contracts; Market	Freedom & Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0753	1/10/2018	{REDACTED}	{REDACTED}	Pricing and Cost Information	Freedom & Ottobock	Complete		3 Years
RX-0756	1/12/2018	{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information	Ottobock	Complete		5 Years
RX-0762	1/17/2018	{REDACTED}	{REDACTED}	Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
RX-0765	1/22/2018	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0770	1/24/2018	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0771	1/25/2018	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Ottobock	Complete		Indefinite
RX-0788	2/7/2018	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets	Ottobock	Complete		Indefinite
RX-0790 ATK-SDT-000002	2/8/2018 0:00	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information;	Freedom & Ottobock	Complete		5 Years
RX-0796	2/14/2018	{REDACTED}	{REDACTED}	Market Analysis Documents	Freedom	Complete		5 Years
RX-0797 OB0517109		{REDACTED}	{REDACTED}	Market Analysis Documents	Freedom	Partial, pp. 8, 10, 12		5 Years
RX-0846	3/8/2018	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0871		{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information;	Freedom & Ottobock	Complete		Indefinite
RX-0872	5/10/2017	{REDACTED}	{REDACTED}	Business Plans & Strategies; Market Analysis Documents	Freedom & Ottobock	Complete		5 Years
RX-0873 OB0001016		{REDACTED}	{REDACTED}	Sales and Financial Information	Ottobock	Complete		5 Years
RX-0891 NorthBayP &O_000000		{REDACTED}	{REDACTED}	Sales and Financial Information	Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	In Camera Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0892		{REDACTED}	{REDACTED}	Contract Negotiations and Customer Contracts	Ottobock	Complete		5 Years
RX-0893		{REDACTED}	{REDACTED}	Customer-Specific Documents; Pricing and Cost Information; ;	Freedom & Ottobock	Complete		5 Years
RX-0911		{REDACTED}	{REDACTED}	Pricing and Cost Information	Ottobock	Complete		3 Years
RX-0912		{REDACTED}	{REDACTED}	Pricing and Cost Information	Ottobock	Complete		3 Years
RX-0913		{REDACTED}	{REDACTED}	Pricing and Cost Information	Freedom & Ottobock	Complete		3 Years
RX-0914		{REDACTED}	{REDACTED}	Pricing and Cost Information	Freedom & Ottobock	Complete		3 Years
RX-0915		{REDACTED}	{REDACTED}	Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
RX-0916		{REDACTED}	{REDACTED}	Pricing and Cost Information	Ottobock	Complete		3 Years
RX-0917		{REDACTED}	{REDACTED}	Pricing and Cost Information	Freedom & Ottobock	Complete		3 Years
RX-0971	8/13/2015	{REDACTED}	{REDACTED}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Ottobock	Complete		Indefinite
RX-0972	1/6/2018	{REDACTED}	{REDACTED}	Market Analysis Documents	Ottobock	Complete		5 Years
RX-0973	2/1/2018	{REDACTED}	{REDACTED}	Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Ottobock	Complete		5 Years
RX-0974	1/1/2018	{REDACTED}	{REDACTED}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets;	Freedom & Ottobock	Complete		Indefinite
RX-0975	3/8/2018	{REDACTED}	{REDACTED}	Contract Negotiations and Customer Contracts	Freedom & Ottobock	Complete		5 Years
RX-1044		{REDACTED}	{REDACTED}	<b>Contract Negotiations and Customer Contracts</b> {REDACTED}	Freedom & Ottobock	Complete		10 Years

# **EXHIBIT B**

## **PUBLIC**

**DOCUMENTS FULLY  
REDACTED AND  
WITHHELD SUBJECT  
TO PENDING MOTION  
FOR *IN CAMERA*  
TREATMENT**

**EXHIBIT C**

**PUBLIC**

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

In the Matter of  
Otto Bock HealthCare North America, Inc.,  
a corporation

Respondent.

Docket No. 9378

PUBLIC DOCUMENT

**DECLARATION OF SCOTT SCHNEIDER IN SUPPORT OF RESPONDENT'S  
MOTION FOR *IN CAMERA* TREATMENT OF CERTAIN TRIAL EXHIBITS**

I, Scott Schneider, make the following declaration under 28 U.S.C. § 1746.

1. I am the Vice President of Medical Affairs, Government Affairs, and Future Development for Otto Bock HealthCare North America, Inc. ("Ottobock" or "Respondent").
2. I submit this declaration in support of Ottobock's Second Motion for *In Camera* Treatment (the "Motion").
3. I am personally familiar with the content of the documents identified in the Motion, the competitive significance to Ottobock and the level of confidentiality associated with the subject matter therein. Based on my review of many of the documents identified in Exhibit "A", my conversations with those individuals who reviewed each document at my direction, my knowledge of Ottobock's business, and my familiarity with the confidentiality protection afforded this type of information by Ottobock, I submit that the disclosure of certain content reflected in these documents to the public and to competitors of Ottobock would cause serious competitive injury to Ottobock. In the ordinary course of business, Ottobock keeps certain information strictly confidential and limits its distribution within the company to employees who must or should know it in connection with their job duties. For example, the customer-specific

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documents include information related to customer-specific pricing, which is generally only known to a handful of sales, marketing, accounting and customer service personnel at Ottobock. The only people outside of Ottobock who would be aware of this information would be the customers themselves, or possibly distributors. Additionally, each document identified in Exhibit "A" has, upon production in this case, been designated "Confidential Material" pursuant to the Protective Order entered on December 20, 2017.

4. Ottobock is a manufacturer of, among other things, prosthetic and orthotic devices, and sells prosthetic and orthotic devices to customers in the United States and around the world. The documents identified in Exhibit "A" relate to and contain information regarding Ottobock's pricing strategy, sales and financial information, business plans and strategies, contract negotiations and customer contracts, intellectual property and proprietary information, market analyses, costing data, and customer-specific documents, all of which are critical to Ottobock's business, marketing, sales, competitiveness and profitability. Competitors and third parties with access to this information would gain a significant business advantage in the prosthetic and orthotic device marketplace at the expense of Ottobock, its customers, and amputees.

5. I understand that the parties to this litigation have included on their trial exhibit lists over one thousand documents that may include Ottobock's confidential information. I was provided with each document contained in Exhibit "A" of Ottobock's Second Motion for *In Camera* Treatment of Certain Trial Exhibits. Due to the volume, a single person could not reasonably review and categorize each document. I reviewed many of the documents, and, further, a small number of agents acting at my direction has reviewed each document multiple times and has described to me the categories of confidential information contained in these

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documents. For each category, I explain below why Ottobock would be harmed if the confidential information was made public. The comprehensive reviews of the documents were conducted for the purpose of determining which designated exhibits contain confidential information, the public disclosure of which would cause a clearly defined, serious injury to Ottobock.

6. Ottobock places significant value upon maintaining the secrecy and confidentiality of the categories of documents identified in Exhibit "A". The public disclosure of any of this critically sensitive information would be highly detrimental to Ottobock. Each document is individually reviewed in turn below, and for convenience's sake, organized by the following categories:

- a. Business Plans & Strategies
- b. Contract Negotiations and Customer Contracts
- c. Intellectual Property, Proprietary Information and Trade Secrets
- d. Customer-Specific Documents
- e. Pricing and Cost Information
- f. Market Analysis Documents
- g. Sales and Financial Information
- h. Multiple Category Documents

7. The subject documents are also summarized in the table attached as Exhibit "A" to Ottobock's Motion.

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8. **Business Plans & Strategies:** Ottobock has produced documents categorized as “Business Plans and Strategies,” which include plans, budgets, presentations, and other forward-looking business plans, as well as non-public documents related to the synergies and efficiencies expected from the acquisition of Freedom. The disclosure of these documents would harm Ottobock by revealing Ottobock’s current and future business plans to competitors. For example, Ottobock has produced many Board of Directors’ Presentations, which contain a wide variety of business plans for many of its different product lines. These plans would give any competitor insight into not only “what” Ottobock plans on doing in the future, but also “how” Ottobock makes its decisions for future business plans. It is this “what” and “how” of Ottobock’s business plans and strategies that has helped Ottobock become a successful prosthetic and orthotic device manufacturer. Access to this information would allow competitors to steal Ottobock’s ideas for sales pitches, marketing strategies, and future product placement. This would allow competitors to take advantage of any weaknesses identified by Ottobock and to enact their own defensive plans to combat Ottobock’s plans. I believe this information should remain confidential.

9. **Contract Negotiations and Customer Contracts:** Ottobock has produced documents that include contract negotiations and contracts with customers. Some of these [REDACTED]. Ottobock has entered into contracts with many different customers, as well as other parties, such as researchers, banks and advisors. The public disclosure of the information contained in these documents could harm Ottobock’s customer relationships and undermine Ottobock’s ability to negotiate in the future, thereby seriously damaging Ottobock’s competitive position in the market. Like most businesses, Ottobock’s contracts with customers vary based on numerous factors, such as size, length of the

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customer relationship, and location. Ottobock's relationships with certain customers could suffer if they learned that other customers entered into contracts with Ottobock with different terms. Further, competitors will be able to seize on this information and further disrupt Ottobock's relationships with its customers. I believe this information should remain confidential.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] I believe this information should

remain confidential.

10. **Intellectual Property, Proprietary Information and Trade Secrets:** Ottobock has produced documents that include trade secrets, including information regarding the technical specifications for its current and future products. The disclosure of this information would clearly harm Ottobock's ability to compete in the market because competitors would be able to use Ottobock's technology to create similar products and/or devise strategies to market its products against Ottobock based on otherwise unavailable information.

11. **Customer-Specific Documents:** Ottobock has also produced "customer-specific documents." [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] I believe this information should remain confidential.

12. **Pricing and Cost Information:** Ottobock has also produced documents containing generic “pricing and cost information,” as opposed to the customer-specific documents. This information is also sensitive and would seriously harm Ottobock if publicly disclosed. The disclosure of Ottobock’s prices and/or costs of its products would damage its relationship with its customers, undermine its negotiating power with customers, and assist competitors by providing them with vital information that Ottobock has thus far remained confidential. [REDACTED]

[REDACTED]

[REDACTED] I believe this information should remain confidential.

13. **Market Analysis Documents:** Ottobock has produced “market analysis documents,” which are commercially valuable to Ottobock’s competitors and customers, and are inherently material to its business. Because the market analyses serve as a basis for current and future business plans, Ottobock’s market analyses can provide competitors with an insight into

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Ottobock's current plans to market its products against competitors, as well as its future plans to better compete in the market. Ottobock spends a lot of money and resources into developing its market analyses, and to allow competitors to seize on that information would create an unfair advantage for those competitors. For instance, Ottobock's market analyses might describe an area of the market identified by Ottobock as a weakness or one that holds an opportunity to explore, of which a competitor can take advantage. The sensitivity of these documents is similar to that of Ottobock's business plans, as they both provide insight into future plans and disclosure would allow a competitor to stymie Ottobock's future growth. I believe this information should remain confidential.

14. **Sales and Financial Information:** Ottobock has produced documents containing its "sales and financial information." Ottobock's sales data and financial information are commercially valuable to Ottobock's competitors and customers, and are inherently material to its business. Disclosure of this information would undermine Ottobock's negotiating power with customers and would allow competitors to obtain valuable insight into Ottobock's business. The public release of these materials would harm Ottobock because the data can reveal Ottobock's current and future plans to improve its business and compete in the market. Ottobock's competitors could use these documents to plan their own competitive activities and/or unfairly undermine Ottobock's plans for growth. For instance, some of Ottobock's financial information contains narrow scopes of information on certain customers and/or certain sales representatives. Allowing competitors to view Ottobock's weakest customers or best sales representatives could provide a competitor with an unfair advantage. I believe this information should remain confidential.

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15. All of the documents identified in Exhibit "A" that are more than three years old contain information that is highly sensitive, and despite the length of time that has passed, the information remains competitively sensitive. Such documents include forecasts and plans that go beyond 2018, which would provide competitors with Ottobock's current and future business plans. Other such documents include pricing that was given to different customers, which could, to this day, still disrupt Ottobock's customer relationships if they found out they paid higher prices than other customers. Further, other such documents show conversations between sales representatives with customers on topics such as competitor products and pricing. Ottobock seeks to have open relationships with its customers, which can only be created through trust of non-disclosure. The disclosure of these conversations with customers could erode the trust Ottobock has built with its customers, and inhibit any future such conversations. Altogether, each of the documents more than three years old, identified in Exhibit "A," contains information that remains competitively sensitive.

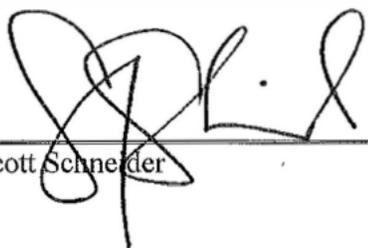
16. Prior to this administrative proceeding, the information contained in the document identified in Exhibit "A" has been exposed only to appropriate Ottobock personnel, any parties included in the subject communications, and any contracting parties to the documents. Ottobock requires its employees to sign non-disclosure and confidentiality agreements to protect and maintain the secrecy of this information. General Ottobock employees do not have access to the documents containing *in camera* material. As a private company, none of the aforementioned information is in the public domain and cannot be obtained through other means.

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

This 16th day of July, 2018.

AUSTIN, TEXAS  
City, State

  
\_\_\_\_\_  
Scott Schneider

**EXHIBIT D**

**PUBLIC**

**DOCUMENT FULLY  
REDACTED AND  
WITHHELD SUBJECT  
TO PENDING MOTION  
FOR *IN CAMERA*  
TREATMENT**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 23, 2018, I caused a true and correct copy of the foregoing Respondent's Second Motion for *In Camera* Treatment of Certain Trial Exhibits to be served via FTC E-Filing System and e-mail upon the following:

D. Michael Chappell  
Chief Administrative Law Judge  
600 Pennsylvania Ave., N.W.  
Rm. H-110  
Washington, DC, 20580

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

Meghan Iorianni  
Jonathan Ripa  
Steven Lavender  
William Cooke  
Yan Gao  
Lynda Lao  
Stephen Mohr  
Michael Moiseyev  
James Weiss  
Daniel Zach

Amy Posner  
Lisa De Marchi Sleight  
Catherine Sanchez  
Sarah Wohl  
Joseph Neely  
Dylan Brown  
Betty McNeil  
Stephen Rodger  
Jordan Andrew

Federal Trade Commission  
600 Pennsylvania Ave., NW  
Washington, DC, 20580

/s/ Andrew J. Rudowitz  
Andrew J. Rudowitz, Esq.