

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION



)
In the Matter of)
)
)
BENCO DENTAL SUPPLY CO.,)
a corporation,)
)
HENRY SCHEIN, INC.,)
a corporation, and)
)
)
PATTERSON COMPANIES, INC.,)
a corporation.)
_____)

PUBLIC
DOCKET NO. 9379
ORIGINAL

PATTERSON’S MOTION FOR *IN CAMERA* PROTECTION OF CERTAIN DOCUMENTS CONTAINING SENSITIVE BUSINESS INFORMATION

Respondent Patterson Companies, Inc. (“Patterson”) respectfully seeks *in camera* protection for a limited set of documents that contain its sensitive and proprietary business information (the “Subject Documents”), listed on Exhibit A attached to this Motion. Full copies of the Subject Documents have been concurrently submitted to the Administrative Law Judge by hand delivery.

FTC Rule 3.45(b) provides for in camera treatment of material offered into evidence where “its disclosure will likely result in a clearly defined, serious injury” to the corporation whose records are at issue. A party seeking such protection must establish that the information is “sufficiently secret and sufficiently material to their business that disclosure would result in serious competitive injury.” *In the Matter of Impax Labs., Inc.*, No. 9373, 2017 WL 4810534, at *1 (F.T.C. Oct. 16, 2017) (quoting *In re General Foods Corp.*, 95 F.T.C. 352, 1980 FTC LEXIS 99, at *10 (Mar. 10, 1980)). A showing of injury may be inferred from the nature of the materials at issue. *Matter of E.I. Dupont De Nemours & Co.*, 97 F.T.C. 116 (1981).

The Commission considers six factors in evaluating secrecy and materiality: (1) the extent to which the information is known outside the applicant's business, (2) the extent to which it is known by employees and others involved in the business, (3) measures taken to guard the secrecy of the information, (4) the value of the information to the applicant and its competitors, (5) the amount of effort or money expended by the applicant in developing the information, and (6) the ease or difficulty with which the information could be properly acquired or duplicated by others. *Bristol-Myers Co.*, 90 F.T.C. 455, 458 (1977). "Underlying this analysis is a general concern for the seriousness of injury to a firm's commercial or competitive position." *DuPont*, 1981 WL 389447, at *1. The Commission weighs any likely competitive injury associated with disclosure against the importance of public disclosure in determining the scope of *in camera* review. *General Foods Corp.*, 95 F.T.C. 352, 355 (1980). The FTC has specifically found that "the likely loss of a business advantage is a good example of a clearly defined, serious injury." *Dura Lube Corp.*, 1999 FTC LEXIS 255, at *7 (1999) (punctuation omitted).

Here, as Exhibit A (listing the Subject Documents) and B [REDACTED] demonstrate, the Subject Documents meet the standard set forth in Rule 3.45(b) and *Bristol-Meyers*. Most of the Subject Documents are Patterson's price class change forms, which record requests for and approvals of changes customer pricing statuses to compete with other distributors of dental products.¹ Other Subject Documents include internal financial documents,² documents discussing customer pricing or discounts,³ strategic business and

¹ See Exhibit A, Row 111 (RX7037).

² Exhibit A, Rows 112 through 165.

³ Exhibit A, rows 11 through 112.

marketing plans,⁴ and internal market-assessment and tracking tools known internally as “dashboards” or “scorecards.”⁵

Patterson considers this information to be highly sensitive and proprietary. [REDACTED]

And it is clear from the nature of these documents that their disclosure would seriously injure Patterson in providing its competitors with a roadmap they could use to steal its business. [REDACTED]

[REDACTED] Much of the information involves customer-specific information related to pricing, discounts, and other individualized data. This information could be used by Patterson’s competitors to gain a competitive advantage with respect to specific customers and pricing. For instance, were a competitor to view the price classes and discounts Patterson provides its customers, it could readily undercut Patterson and steal its customers. Similarly, were a competitor to view Patterson’s strategic business plans or market-assessments, it could adapt its own plans to take advantage of Patterson’s internal forecasts and decisions as to where to allocate its limited resources. *Id.*; see *In the Matter of Impax Labs., Inc., A Corp., Respondent.*, No. 9373, 2017 WL 4948988, at *1 (F.T.C. Oct. 23, 2017) (ordering *in camera* treatment for “documents that include financial and sales projections for future years and pipeline products”).

Patterson has worked in good faith to limit the information for which it seeks *in camera* treatment. It identified the Subject Documents by individually reviewing every exhibit in this case that originated from its files. It did so judiciously, limiting proposed *in camera* treatment only to specific documents and not related parent emails or email families, as an example. And the 364 Subject Documents are only a small fraction of the 4,768 exhibits listed in this case, 2,042 of which are Patterson documents, and are less than half the number of exhibits granted such treatment in

⁴ Exhibit A, rows 227 through 365.

⁵ Exhibit A, rows 168 through 223.

Tronix. Order, Dkt. No. 9377 (May 15, 2018). Patterson is furthermore requesting periods of *in camera* treatment consistent with those permitted by this Court in *Tronox*:

Type of Confidential Information	Requested period	<i>Tronox</i> period
Customer Pricing	10 years	10 years
Customer Information	10 years	10 years
Financial Information	10 years	10 years
Market Assessment or Tracking Tools	5 years	5 years
Personal Information	Indefinite	Indefinite
Strategic Business or Marketing Plans ⁶	10 years	10 years

There is no conceivable public interest in the content of these obscure, industry-specific documents. The only parties likely to be interested in viewing these documents are Patterson's competitors.

For these reasons, the Subject Documents fall within FTC Rule 3.45(b)'s standard for *in camera* protection and should be afforded that protection.

Dated: October 2, 2018

/s/ Joseph A. Ostoyich

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⁶ Patterson has included within this category depositions of its current or former employees and expert witnesses and is requesting indefinite *in camera* treatment for these documents, which discuss sensitive Patterson information throughout, particularly including strategic and business plans and decisions.

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***ATTORNEYS FOR
PATTERSON COMPANIES, INC.***

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

_____)	
In the Matter of)	
)	
BENCO DENTAL SUPPLY CO.,)	PUBLIC
a corporation,)	
)	DOCKET NO. 9379
HENRY SCHEIN, INC.,)	
a corporation, and)	
)	
PATTERSON COMPANIES, INC.,)	
a corporation.)	
_____)	

PROPOSED ORDER

On September 26, 2018, Patterson Companies, Inc. filed its Motion for In Camera Protection of Certain documents appearing on the Exhibit Lists of the parties to this action. Upon consideration of this motion, Patterson’s Motion is Granted with respect to the documents identified in Exhibit A to the motion.

ORDERED

_____, 2018

D. Michael Chappell
Administrative Law Judge

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2018, I filed the foregoing public document electronically using the FTC's E-Filing System, which will send notification of such filing to:

The Honorable D. Michael Chappell
 Chief Administrative Law Judge
 Federal Trade Commission
 600 Pennsylvania Avenue, N.W., Room H-110
 Washington, D.C. 20580

Donald S. Clark
 Office of the Secretary
 Federal Trade Commission
 Constitution Center
 400 Seventh Street, S.W.
 Fifth Floor
 Suite CC-5610 (Annex B)
 Washington, D.C. 20024

I also hereby certify that on October 2, 2018, I delivered via electronic mail a copy of the foregoing public document to:

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Counsel for Respondent Henry Schein, Inc.

October 2, 2018

By: /s/ Andrew T. George

Attorney

CERTIFICATE FOR ELECTRONIC FILING

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

October 2, 2018

By: /s/ Andrew T. George

Attorney

Exhibit A

EXHIBIT A

RX/CX	Description	Date	Confidentiality Category	Duration of In Camera Treatment Requested
CX0139			Customer Information	10 years
CX3005			Customer Information	10 years
CX3110			Customer Information	10 years
CX3337			Customer Information	10 years
CX3421			Customer Information	10 years
RX0545			Customer Information	10 years
RX0579			Customer Information	10 years
RX0678			Customer Information	10 years
RX0715			Customer Information	10 years
CX0152			Customer Pricing	10 years
CX0153			Customer Pricing	10 years
CX0154			Customer Pricing	10 years

EXHIBIT A

CX3099		Customer Pricing	10 years
CX3104		Customer Pricing	10 years
CX3135		Customer Pricing	10 years
CX3136		Customer Pricing	10 years
CX3137		Customer Pricing	10 years

EXHIBIT A

CX3138		Customer Pricing	10 years
CX3166		Customer Pricing	10 years
CX3174		Customer Pricing	10 years
CX3179		Customer Pricing	10 years
CX3238		Customer Pricing	10 years
CX3239		Customer Pricing	10 years
CX3258		Customer Pricing	10 years
CX3260		Customer Pricing	10 years
CX3261		Customer Pricing	10 years

EXHIBIT A

CX3262		Customer Pricing	10 years
CX3376		Customer Pricing	10 years
CX3494		Customer Pricing	10 years
CX3495		Customer Pricing	10 years
CX3501		Customer Pricing	10 years
RX0010		Customer Pricing	10 years
RX0035		Customer Pricing	10 years
RX0041		Customer Pricing	10 years
RX0060		Customer Pricing	10 years
RX0061		Customer Pricing	10 years
RX0081		Customer Pricing	10 years
RX0089		Customer Pricing	10 years
RX0091		Customer Pricing	10 years
RX0094		Customer Pricing	10 years
RX0121		Customer Pricing	10 years
RX0134		Customer Pricing	10 years
RX0158		Customer Pricing	10 years
RX0189		Customer Pricing	10 years
RX0204		Customer Pricing	10 years
RX0214		Customer Pricing	10 years
RX0219		Customer Pricing	10 years
RX0220		Customer Pricing	10 years
RX0231		Customer Pricing	10 years
RX0246		Customer Pricing	10 years

EXHIBIT A

RX0251		Customer Pricing	10 years
RX0254		Customer Pricing	10 years
RX0274		Customer Pricing	10 years
RX0275		Customer Pricing	10 years
RX0276		Customer Pricing	10 years
RX0277		Customer Pricing	10 years
RX0279		Customer Pricing	10 years
RX0293		Customer Pricing	10 years
RX0307		Customer Pricing	10 years
RX0318		Customer Pricing	10 years
RX0334		Customer Pricing	10 years
RX0335		Customer Pricing	10 years
RX0345		Customer Pricing	10 years
RX0357		Customer Pricing	10 years
RX0358		Customer Pricing	10 years
RX0362		Customer Pricing	10 years
RX0363		Customer Pricing	10 years
RX0386		Customer Pricing	10 years
RX0394		Customer Pricing	10 years
RX0399		Customer Pricing	10 years
RX0407		Customer Pricing	10 years
RX0408		Customer Pricing	10 years
RX0414		Customer Pricing	10 years
RX0421		Customer Pricing	10 years
RX0434		Customer Pricing	10 years
RX0447		Customer Pricing	10 years
RX0456		Customer Pricing	10 years
RX0492		Customer Pricing	10 years
RX0500		Customer Pricing	10 years

EXHIBIT A

RX0503		Customer Pricing	10 years
RX0506		Customer Pricing	10 years
RX0528		Customer Pricing	10 years
RX0538		Customer Pricing	10 years
RX0539		Customer Pricing	10 years
RX0540		Customer Pricing	10 years
RX0567		Customer Pricing	10 years
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RX0614		Customer Pricing	10 years
RX0615		Customer Pricing	10 years
RX0617		Customer Pricing	10 years
RX0633		Customer Pricing	10 years
RX0635		Customer Pricing	10 years
RX0636		Customer Pricing	10 years
RX0637		Customer Pricing	10 years
RX0658		Customer Pricing	10 years
RX0666		Customer Pricing	10 years
RX0667		Customer Pricing	10 years

EXHIBIT A

RX0669		Customer Pricing	10 years
RX0672		Customer Pricing	10 years
RX0674		Customer Pricing	10 years
RX0677		Customer Pricing	10 years
RX0683		Customer Pricing	10 years
RX0685		Customer Pricing	10 years
RX0719		Customer Pricing	10 years
RX0737		Customer Pricing	10 years
RX0455		Customer Pricing; Financial Information	10 years
CX3058			
		Financial Information	10 years
RX0001		Financial Information	10 years
RX0003		Financial Information	10 years
RX0011		Financial Information	10 years
RX0015		Financial Information	10 years
RX0018		Financial Information	10 years
RX0033		Financial Information	10 years
RX0034		Financial Information	10 years
RX0071		Financial Information	10 years
RX0072		Financial Information	10 years
RX0073		Financial Information	10 years
RX0082		Financial Information	10 years
RX0083		Financial Information	10 years

EXHIBIT A

RX0111		Financial Information	10 years
RX0124		Financial Information	10 years
RX0132		Financial Information	10 years
RX0183		Financial Information	10 years
RX0185		Financial Information	10 years
RX0191		Financial Information	10 years
RX0198		Financial Information	10 years
RX0241		Financial Information	10 years
RX0252		Financial Information	10 years
RX0301		Financial Information	10 years
RX0351		Financial Information	10 years
RX0417		Financial Information	10 years
RX0611		Financial Information	10 years
RX0612		Financial Information	10 years
RX0624		Financial Information	10 years
RX0646		Financial Information	10 years
RX0647		Financial Information	10 years
RX0648		Financial Information	10 years
RX0661		Financial Information	10 years
RX0662		Financial Information	10 years
RX0663		Financial Information	10 years
RX0664		Financial Information	10 years
RX0676		Financial Information	10 years
RX0687		Financial Information	10 years
RX0704		Financial Information	10 years
RX0709		Financial Information	10 years

EXHIBIT A

RX0710		Financial Information	10 years
RX0713		Financial Information	10 years
RX0716		Financial Information	10 years
RX0717		Financial Information	10 years
RX0718		Financial Information	10 years
RX0721		Financial Information	10 years
RX0722		Financial Information	10 years
RX0726		Financial Information	10 years
RX0727		Financial Information	10 years
RX0728		Financial Information	10 years
RX0732		Financial Information	10 years
RX0733		Financial Information	10 years
RX0734		Financial Information	10 years
RX0735		Financial Information	10 years
CX0083		Financial Information; Customer Pricing	10 years
RX0299		Financial Information; Customer Pricing	10 years
RX0720		Market Assessment or Tracking Tools	5 years
RX0730		Market Assessment or Tracking Tools	5 years
RX0731		Market Assessment or Tracking Tools	5 years
CX3259		Market Assessment or Tracking Tools	5 years

EXHIBIT A

RX0436		Market Assessment or Tracking Tools	5 years
RX0437		Market Assessment or Tracking Tools	5 years
RX0446		Market Assessment or Tracking Tools	5 years
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RX0457		Market Assessment or Tracking Tools	5 years
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RX0474		Market Assessment or Tracking Tools	5 years
RX0486		Market Assessment or Tracking Tools	5 years
RX0491		Market Assessment or Tracking Tools	5 years
RX0505		Market Assessment or Tracking Tools	5 years
RX0508		Market Assessment or Tracking Tools	5 years

EXHIBIT A

RX0509		Market Assessment or Tracking Tools	5 years
RX0512		Market Assessment or Tracking Tools	5 years
RX0515		Market Assessment or Tracking Tools	5 years
RX0521		Market Assessment or Tracking Tools	5 years
RX0531		Market Assessment or Tracking Tools	5 years
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RX0542		Market Assessment or Tracking Tools	5 years
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RX0563		Market Assessment or Tracking Tools	5 years
RX0589		Market Assessment or Tracking Tools	5 years
RX0600		Market Assessment or Tracking Tools	5 years
RX0603		Market Assessment or Tracking Tools	5 years
RX0605		Market Assessment or Tracking Tools	5 years
RX0622		Market Assessment or Tracking Tools	5 years
RX0627		Market Assessment or Tracking Tools	5 years
RX0639		Market Assessment or Tracking Tools	5 years
RX0670		Market Assessment or Tracking Tools	5 years

EXHIBIT A

RX0679		Market Assessment or Tracking Tools	5 years
RX0680		Market Assessment or Tracking Tools	5 years
RX0681		Market Assessment or Tracking Tools	5 years
RX0686		Market Assessment or Tracking Tools	5 years
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RX0697		Market Assessment or Tracking Tools	5 years
RX0698		Market Assessment or Tracking Tools	5 years
RX0700		Market Assessment or Tracking Tools	5 years
RX0701		Market Assessment or Tracking Tools	5 years
RX0706		Market Assessment or Tracking Tools	5 years

EXHIBIT A

RX0708		Market Assessment or Tracking Tools; Financial Information	10 years
CX0102		Personal Information	Indefinite
CX3110		Personal Information	Indefinite
CX3195_EXCE RPT		Personal Information	Indefinite
RX1094		Strategic Business and Marketing Plans	10 years
RX1097		Strategic Business and Marketing Plans	10 years
RX1101		Strategic Business and Marketing Plans	10 years
CX0086		Strategic Business and Marketing Plans	10 years
CX0125		Strategic Business and Marketing Plans	10 years
CX0131		Strategic Business and Marketing Plans	10 years
CX0132		Strategic Business and Marketing Plans	10 years
CX0143		Strategic Business and Marketing Plans	10 years

EXHIBIT A

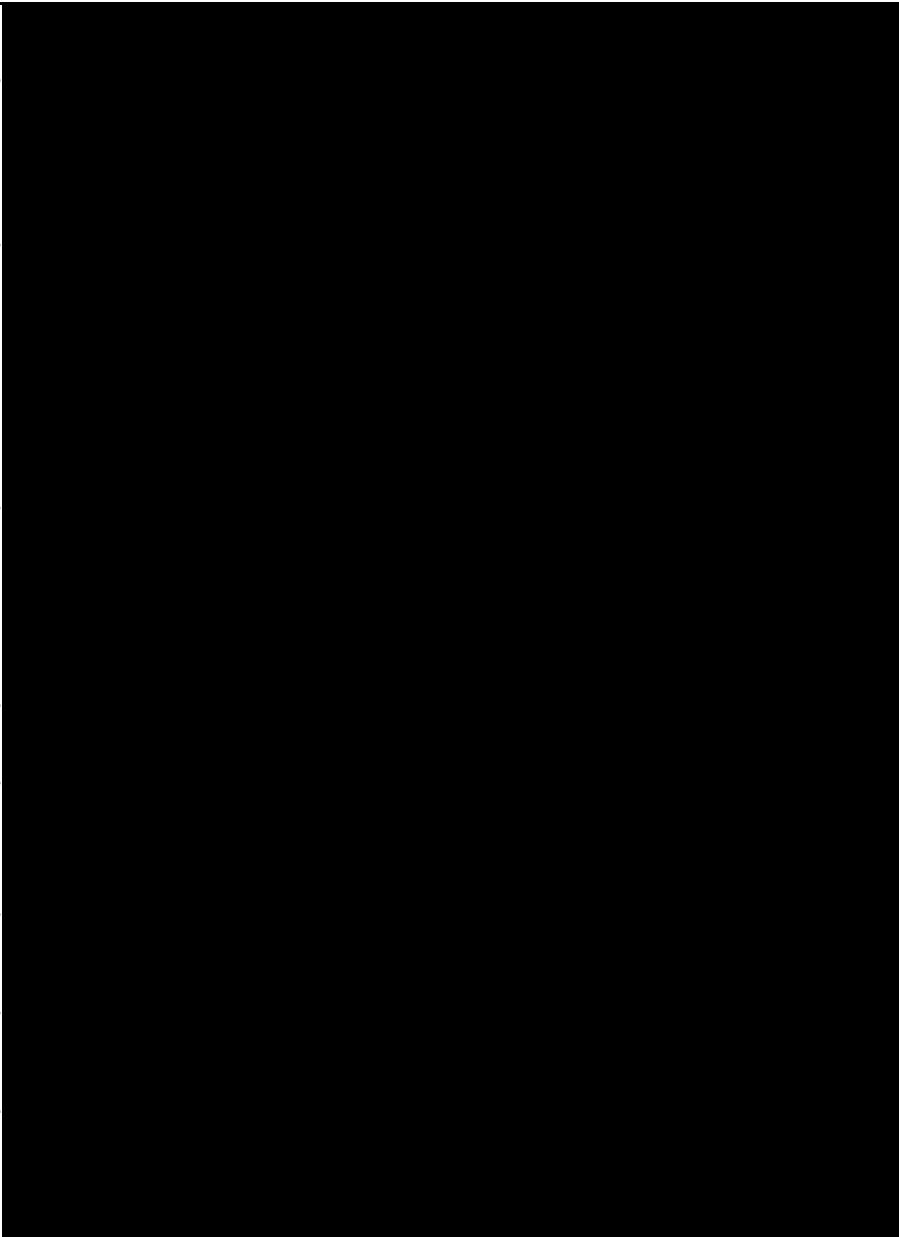
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CX3073		Strategic Business and Marketing Plans	10 years
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CX3140		Strategic Business and Marketing Plans	10 years
CX3142		Strategic Business and Marketing Plans	10 years
CX3144		Strategic Business and Marketing Plans	10 years
CX3180		Strategic Business and Marketing Plans	10 years

EXHIBIT A

CX3280		Strategic Business and Marketing Plans	10 years
CX3281		Strategic Business and Marketing Plans	10 years
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CX3296		Strategic Business and Marketing Plans	10 years
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CX3298		Strategic Business and Marketing Plans	10 years
CX3299		Strategic Business and Marketing Plans	10 years
CX3334		Strategic Business and Marketing Plans	10 years

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CX3360		Strategic Business and Marketing Plans	10 years
CX3361		Strategic Business and Marketing Plans	10 years
CX3381		Strategic Business and Marketing Plans	10 years
CX3418		Strategic Business and Marketing Plans	10 years
CX3423		Strategic Business and Marketing Plans	10 years
CX3443		Strategic Business and Marketing Plans	10 years
CX3444		Strategic Business and Marketing Plans	10 years
RX0022		Strategic Business and Marketing Plans	10 years
RX0028		Strategic Business and Marketing Plans	10 years
RX0031		Strategic Business and Marketing Plans	10 years
RX0039		Strategic Business and Marketing Plans	10 years
RX0040		Strategic Business and Marketing Plans	10 years

EXHIBIT A

RX0043		Strategic Business and Marketing Plans	10 years
RX0046		Strategic Business and Marketing Plans	10 years
RX0057		Strategic Business and Marketing Plans	10 years
RX0062		Strategic Business and Marketing Plans	10 years
RX0063		Strategic Business and Marketing Plans	10 years
RX0069		Strategic Business and Marketing Plans	10 years
RX0074		Strategic Business and Marketing Plans	10 years
RX0084		Strategic Business and Marketing Plans	10 years
RX0109		Strategic Business and Marketing Plans	10 years
RX0114		Strategic Business and Marketing Plans	10 years
RX0116		Strategic Business and Marketing Plans	10 years
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RX0160		Strategic Business and Marketing Plans	10 years
RX0163		Strategic Business and Marketing Plans	10 years
RX0175		Strategic Business and Marketing Plans	10 years

EXHIBIT A

RX0182		Strategic Business and Marketing Plans	10 years
RX0217		Strategic Business and Marketing Plans	10 years
RX0221		Strategic Business and Marketing Plans	10 years
RX0222		Strategic Business and Marketing Plans	10 years
RX0225		Strategic Business and Marketing Plans	10 years
RX0228		Strategic Business and Marketing Plans	10 years
RX0230		Strategic Business and Marketing Plans	10 years
RX0242		Strategic Business and Marketing Plans	10 years
RX0257		Strategic Business and marketing Plans	10 years
RX0258		Strategic Business and Marketing Plans	10 years
RX0261		Strategic Business and Marketing Plans	10 years
RX0262		Strategic Business and Marketing Plans	10 years
RX0264		Strategic Business and Marketing Plans	10 years
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RX0267		Strategic Business and Marketing Plans	10 years
RX0298		Strategic Business and Marketing Plans	10 years

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RX0306		Strategic Business and Marketing Plans	10 years
RX0352		Strategic Business and Marketing Plans	10 years
RX0360		Strategic Business and Marketing Plans	10 years
RX0385		Strategic Business and Marketing Plans	10 years
RX0411		Strategic Business and Marketing Plans	10 years
RX0420		Strategic Business and Marketing Plans	10 years
RX0422		Strategic Business and Marketing Plans	10 years
RX0440		Strategic Business and Marketing Plans	10 years
RX0441		Strategic Business and Marketing Plans	10 years
RX0442		Strategic Business and Marketing Plans	10 years
RX0443		Strategic Business and Marketing Plans	10 years
RX0444		Strategic Business and Marketing Plans	10 years
RX0448		Strategic Business and Marketing Plans	10 years
RX0541		Strategic Business and Marketing Plans	10 years
RX0543		Strategic Business and Marketing Plans	10 years
RX0544		Strategic Business and Marketing Plans	10 years
RX0548		Strategic Business and Marketing Plans	10 years

EXHIBIT A

RX0549		Strategic Business and Marketing Plans	10 years
RX0551		Strategic Business and Marketing Plans	10 years
RX0552		Strategic Business and Marketing Plans	10 years
RX0571		Strategic Business and Marketing Plans	10 years
RX0572		Strategic Business and Marketing Plans	10 years
RX0575		Strategic Business and Marketing Plans	10 years
RX0581		Strategic Business and Marketing Plans	10 years
RX0594		Strategic Business and Marketing Plans	10 years
RX0610		Strategic Business and Marketing Plans	10 years
RX0613		Strategic Business and Marketing Plans	10 years
RX0631		Strategic Business and Marketing Plans	10 years
RX0640		Strategic Business and Marketing Plans	10 years
RX0645		Strategic Business and Marketing Plans	10 years
RX0675		Strategic Business and Marketing Plans	10 years
RX0703		Strategic Business and Marketing Plans	10 years
RX0723		Strategic Business and Marketing Plans	10 years
RX0724		Strategic Business and Marketing Plans	10 years

EXHIBIT A

RX0725		Strategic Business and Marketing Plans	10 years
RX2980		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX2981		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX2982		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX2983		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX2984		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX2985		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX3017		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX3019		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX3028		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX3032		Strategic Business and Marketing Plans; Customer Pricing	Indefinite

EXHIBIT A

RX3033		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX3038		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX3039		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX3041		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX3042		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX3048		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX3050		Strategic Business and Marketing Plans; Customer Pricing	Indefinite
RX0472		Strategic Business and Marketing Plans; Customer Pricing; Financial Information	10 years
RX2833		Strategic Business and Marketing Plans; Customer Pricing; Financial Information	Indefinite
RX2967		Strategic Business and Marketing Plans; Customer Pricing; Financial Information	Indefinite

EXHIBIT A

RX0433		Strategic Business and Marketing Plans; Financial Information	10 years
RX0445		Strategic Business and Marketing Plans; Financial Information	10 years
RX0450		Strategic Business and Marketing Plans; Financial Information	10 years
RX0468		Strategic Business and Marketing Plans; Financial Information	10 years
RX0488		Strategic Business and Marketing Plans; Financial Information	10 years
RX0558		Strategic Business and Marketing Plans; Financial Information	10 years
RX0604		Strategic Business and Marketing Plans; Financial Information	10 years
RX0712		Strategic Business and Marketing Plans; Financial Information; Customer Information	10 years

Exhibit B

Notice of Electronic Service

I hereby certify that on October 02, 2018, I filed an electronic copy of the foregoing 2018-10-02 Patterson's Motion for In Camera Protection [PUBLIC], with:

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

Donald Clark
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I hereby certify that on October 02, 2018, I served via E-Service an electronic copy of the foregoing 2018-10-02 Patterson's Motion for In Camera Protection [PUBLIC], upon:

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