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SECRETARY

UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of BENCO DENTAL SUPPLY CO., a corporation,)) Docket No. 9379	ORIGINAL
HENRY SCHEIN, INC., a corporation, and)))	
PATTERSON COMPANIES, INC., a corporation.)))	

RESPONDENT BENCO DENTAL SUPPLY CO.'S MOTION FOR IN CAMERA TREATMENT OF TRIAL EXHIBITS

Respondent Benco Dental Supply Co. ("Benco"), by and through its undersigned counsel, respectfully moves pursuant to 16 C.F.R. § 3.45(b) and the scheduling order in this matter (dated March 14, 2018) for *in camera* treatment of certain documents designated as trial exhibits by the parties to this case.

Complaint Counsel and Benco (in conjunction with its co-respondents) have submitted their final proposed exhibit lists. Many of the documents produced by Benco that appear on Respondents' exhibit list or Complaint Counsel's exhibit list contain confidential, competitively sensitive information. Rule 3.45(b) provides that a party may obtain *in camera* treatment for materials offered into evidence if "public disclosure will likely result in a clearly defined, serious injury." Benco, together with its counsel, has carefully reviewed all of the Benco-produced documents that appear on the parties' final exhibit lists. Benco and its counsel have determined that the public disclosure of documents listed in Exhibit B will cause a clearly defined, serious injury to Benco. For the reasons set for forth below and in the Declaration of Rebecca Warren (Exhibit A), Benco seeks *in camera* treatment for these confidential materials.

I. Legal Standard

An applicant seeking *in camera* treatment for material offered into evidence must demonstrate that "its public disclosure will likely result in a clearly defined, serious injury." 16 C.F.R. § 3.45(b). The applicant must "make a clear showing that the information concerned is sufficiently secret and sufficiently material to their business that disclosure would result in serious competitive injury." *In re 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017) (citation omitted). This tribunal weighs six factors to determine whether the information is sufficiently secret and material to warrant *in camera* treatment:

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

In re Bristol-Myers Co., 90 F.T.C. 455, at *5 (1977).

II. Benco's Materials Meet the "Clearly Defined, Serious Injury Standard"

All six *Bristol-Myers* factors support Benco's motion for *in camera* treatment.

First, the information at issue is particular to Benco's business and is not known outside Benco, with the exception of prices, which are known to customers and other parties involved in the sales process. *See* Warren Decl. at \P 4.

Second, the information at issue is known only to a small group within Benco. All of the information is generally shared only with those employees who must or should be aware of it in

connection with their job duties, and never with more than a small fraction of Benco's 1500 employees. *See id*.

Third, the documents that are identified in this motion were produced confidentially under the protections of the protective order in this matter and/or under the protections of protective orders entered in other private actions. Benco has taken due care to protect the confidentiality of the information at issue, including by establishing and adhering to policies and practices prohibiting its disclosure, and producing it only pursuant to legal assurances that it would remain confidential. *See id.*

Fourth and most significantly, disclosure of these materials would severely hinder Benco's ability to compete in the marketplace. *See id.* ¶¶ 6-11. For instance, Benco's competitors would be able to use this information to unfairly compete with Benco and to counteract Benco's competitive strategies. Benco's relationships with certain customers would also suffer if the customers perceived themselves to be receiving less favorable terms than other customers. The gains accruing to Benco's competitors and customers would come at Benco's loss, working a clearly defined and serious injury to Benco. *See id.* Any financial injury to Benco could impact the level of educational and support services it offers to its customers and reduce its ability to continue to expand operations in parts of the country where it traditionally has had only a limited presence.

Fifth, while most of the materials were created organically through Benco's ordinary business activities, Benco expended significant amounts of money on developing some of the materials, such as consultant reports. The consultants retained are required to keep the information confidential pursuant to agreements entered into with Benco. *See id.* \P 4.

Sixth, it would generally be impossible for another party to properly acquire or develop the information at issue because it is drawn from Benco's confidential files and cannot be replicated by any third party. *See id.* ¶¶ 6-11.

The Commission has recognized that competitively sensitive information related to supply products is subject to extraordinary levels of protection. For example, in 1979, Administrative Law Judge Miles J. Brown ordered in camera treatment for certain exhibits produced by E.I. Du Pont De Nemours & Co. ("DuPont") that contained detailed cost and operations data. In re E.I. DuPont De Nemours & Co., 151 F.T.C. 679 (2011). Since then, DuPont has requested on numerous occasions that those documents remain in camera, and the Commission has consistently granted those requests. Most recently in 2011, the Commission has extended in camera treatment again until 2021. See id. Even 30 years after the documents were produced, the Commission agreed that if competitors had "access to such detailed cost and operations information, [they] could ascertain DuPont's current costs through the use of readily available extrapolation techniques . . . [and] gain valuable insight about DuPont's closely held and proprietary production process." Id. The Commission explained that the documents should remain sealed given "the unusual level of detailed cost and operations data contained in the identified trial exhibits, the existence of precise extrapolation techniques, and the limited amount of technological innovation that has occurred in the titanium dioxide industry." *Id.* at 680. Those same competitive concerns exist in this case and the Commission's reasons for granting significant protections to DuPont's sensitive information should also apply here.

III. Each Type of Confidential Information Should Remain In Camera

As described in the Warren Declaration, the materials at issue fall into at least one of five categories. The following summary chart lists each category of materials, the applicable paragraph discussing the category in the Warren Declaration, and the time period for which Benco requests *in camera* treatment:

Type of Confidential Information	Declaration	Period
Customer-Specific Price and Volume Information	¶ 6	10 Years
Pricing Strategy Information	¶ 7	10 Years
Information Regarding Price-Setting Processes	¶ 8	10 Years
Business Plans	¶ 9	10 Years
Sensitive Personal Information	¶ 10	Indefinite

Exhibit B lists each document in question, the applicable bases for *in camera* treatment, and the time period for which *in camera* treatment is sought. For documents that fall into more than one confidentiality category, Benco seeks *in camera* treatment for the longer applicable period.

A. Customer-Specific Price and Volume Information

The first category of documents and information that should be granted *in camera* treatment is the category of documents that contain individual customer price and volume information, or other sensitive customer-specific negotiations information. This category includes the detailed transactional data that Benco produced in electronic form pursuant to subpoena issued by Complaint Counsel in this matter and subject to protective order in related private litigation. Benco does not publish sale prices and does not publicly reveal any customer-specific information related to prices, discounts, margins, or sales volumes. Warren Decl. ¶ 6. Since Benco negotiates prices with each of its customers, individualized pricing data is among the most highly-sensitive information that Benco has produced. *Id.* If this confidential pricing and volume information is disclosed, Benco's competitors could use it to unfairly take business from Benco. *Id.*

Benco strives to develop stable, long-term relationships with its customers, so prices paid by those customers relative to other customers tend to change only gradually over time. Specific price and volume information can be used to infer relevant information about Benco's current (and

future) prices and commercial relationships. *Id.* Benco requests that this highly sensitive information remain *in camera* for ten years. *See In the Matter of Impax Labs., Inc., A Corp., Respondent.*, No. 9373, 2017 WL 6033193, at *2 (F.T.C. Nov. 28, 2017) (granting *in camera* treatment for ten years over documents containing "data, methods and models from the National Prescription Audit database and/or the National Sales Perspectives database").

B. Pricing Strategy Information

The documents noticed for potential use at trial include internal company presentations and communications that reflect Benco's confidential pricing strategy information. Warren Decl. ¶ 7. Public disclosure of this confidential information would harm Benco for all of the same reasons that customer-specific information would harm Benco as described in the prior section. *Id.*Additionally, the disclosure of this information would (i) damage established customer relationships, (ii) provide competitors with a roadmap of Benco's pricing and sales process and an unfair insight into how Benco competes for the business of specific customers, and (iii) generally undermine Benco's ability to compete effectively in the marketplace. *Id.* In addition, many of the documents in this category remain competitively sensitive and require extended *in camera* protection. As such, Benco requests that pricing strategy documents and related internal strategy documents be granted *in camera* treatment for ten years.

C. Information Regarding Price-Setting Processes

Benco has produced documents that contain strategically sensitive information about how Benco sets and negotiates prices. Warren Decl. ¶ 8. These documents include information about how Benco decides whether to implement a price increase and how Benco responds to various types of competitive offers. *Id.* Since Benco's negotiation strategies have not changed significantly, even information that is years old is sensitive because it would tend to reveal Benco's current (and future) approach to price negotiations. *Id.* Given the highly sensitive nature of these documents,

Benco requests this information remain *in camera* for ten years. *See In the Matter of Impax Labs*, 2017 WL 6033193, at *2 (granting *in camera* treatment for ten years over documents containing "data, methods and models from the National Prescription Audit database and/or the National Sales Perspectives database").

D. Business Plans

Benco produced business planning documents, including strategic plans, budgets, and other forward-looking business plans. Warren Decl. ¶ 9. The public release of these materials would harm Benco because they reveal Benco's current and future plans to improve its business and compete in the market, and Benco's competitors could use them to plan their own competitive activities or unfairly undermine Benco's plans for growth. *Id.* Benco requests that these documents remain *in camera* for a period of ten years. *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 ten years over "documents that include financial and sales projections for future years and pipeline products").

E. Sensitive Personal Information

Benco produced documents that contain sensitive personal information such as social security numbers, personal addresses, account numbers, telephone numbers, and sensitive health information. Warren Decl. ¶ 10. Benco requests that sensitive personal information be kept *in camera* indefinitely because "sensitive personal information ... shall be accorded permanent *in camera* treatment unless disclosure or an expiration date is required or provided by law." 16 C.F.R. § 3.45(b)(3). "Sensitive personal information" shall include, but shall not be limited to, an individual's Social Security number, . . . financial account number, . . . and any sensitive health information identifiable by individual, such as an individual's medical records." 16 C.F.R. 3.45(b). In addition to these listed categories of information, individuals' telephone records have been found

to be "sensitive personal information" and accorded *in camera* treatment. *See In re McWane, Inc.*, 2012 FTC LEXIS 156 (Sept. 17, 2012).

IV. Conclusion

For the reasons set forth herein, Benco respectfully moves that its motion for *in camera* treatment be granted.

Dated: October 2, 2018 Respectfully submitted,

By: /s/ Thomas Manning

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CERTIFICATE OF SERVICE

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

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Dated: October 2, 2018 By: /s/ Thomas Manning

Exhibit A

Declaration of Rebecca Warren

- 1. My name is Rebecca Warren. I am the Interim General Counsel of Benco Dental Supply Co. ("Benco").
- 2. I am responsible for supervising all of Benco's legal functions since my appointment as Interim General Counsel on July 16, 2018. I have been employed by Benco since May 2018.
- 3. I am familiar with Benco's policies and procedures regarding the protection of confidential information, and I have personal knowledge of how the disclosure of various types of confidential information would harm Benco.
- 4. In the ordinary course of business, Benco 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 instance, customerspecific price information is generally known only to a handful of executives, sales, customer service, and accounting personnel. Generally speaking, the only people outside Benco who would be aware of this information are the customers themselves, and at times consultants that are required to keep information confidential through the engagement agreements. When Benco produced confidential material to the FTC, it relied on the confidentiality rules and protective order which shielded confidential information from public disclosure.
- 5. I understand that the parties to this litigation have included on their trial exhibit lists numerous documents that Benco identified as confidential. Due to the volume, no one person could reasonably review and categorize each document. Benco's outside counsel has described to me the categories of confidential information contained in these documents. For each category, I explain why Benco will be harmed if the confidential information is made public.
- 6. Customer-Specific Price and Volume Information. Benco individually negotiates prices with each of its customers. Benco does not publicly reveal any customer-specific information related to prices, discounts, margins, or sales volumes. This information is highly sensitive. If confidential pricing and volume information is disclosed, Benco's competitors could use it to unfairly take business from Benco. If this confidential pricing and volume information is disclosed, Benco's relations with its customers could be harmed, and Benco's ability to compete effectively in the marketplace would be undermined. Further, Benco's relationships with certain customers could suffer if they learned that other customers were paying different prices. I believe this information should remain confidential because it can be used to infer relevant information about Benco's current (and future) prices and commercial relationships. For instance, Benco strives to develop stable, long-term relationships with its customers so prices paid by those customers relative to other customers tend to change only gradually over time. Additionally, this category

- includes the detailed transactional data that Benco produced in electronic form pursuant to subpoena issued by Complaint Counsel in this matter and subject to protective order in related private litigation
- 7. Pricing Strategy Information. Benco also has produced documents that detail how the company devises its pricing strategy information. This information is also sensitive and would seriously harm Benco if publicly disclosed for all of the same reasons that customer-specific information would harm Benco as described in the previous paragraph. The disclosure of this information would (i) damage established customer relationships, (ii) provide competitors with a roadmap of Benco's pricing and sales process and an unfair insight into how Benco competes for the business of specific customers, and (iii) generally undermine Benco's ability to compete effectively in the marketplace. I believe this information should remain confidential.
- 8. <u>Information Regarding Price-Setting Processes</u>. Benco has produced documents that contain information about how Benco sets and negotiates prices. These documents include information about how Benco decides whether to implement a price increase and how it determines how to respond to various types of competitive offers. I believe this information should remain confidential. Even information that is years old is sensitive because it would tend to reveal Benco's current (and future) approach to price negotiations.
- 9. <u>Business Plans</u>. Benco produced documents categorized as "Business Plans" which include strategic plans, budgets, and other forward-looking business plans. The public release of these materials would harm Benco because they reveal Benco's current and future plans to improve its business and compete in the market; Benco's competitors could use them to plan their own competitive activities or unfairly undermine Benco's plans for growth. I believe this information should remain confidential.
- 10. <u>Sensitive Personal Information</u>. Benco also produced documents that contained sensitive personal information such as social security numbers, personal addresses, telephone numbers, and sensitive health information. I believe this information should remain confidential.
- 11. Other Confidential Information. For each category, the examples provided are merely representative—they are not meant to be an exhaustive list of the types of documents in that category that appear on the parties' exhibit lists and that should be afforded *in camera* treatment because releasing them to the public would harm Benco. Similarly, these categories cannot capture every possible type of sensitive information that should not be released to the public. I understand that Benco's outside counsel may identify such documents and, with my guidance, identify in applicable court filings why *in camera* treatment is warranted for those documents.

12. This declaration draws upon the collective efforts of multiple people other than myself, and is based on my understanding of the facts at this time. I reserve the right to modify or supplement this affidavit if I discover new facts that render it inaccurate or incomplete.

Rebecca Warren

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

Dated: 09.25.2618

4810-9215-9859, v. 1

PUBLIC Exhibit B

		Duration of in camera Treatment
Trial Ex. No.	Confidentiality Category	Requested
CX0002	Pricing Strategy Information	10 years
CX0003	Pricing Strategy Information	10 years
CX0041	Pricing Strategy Information	10 years
CX0042	Pricing Strategy Information	10 years
CX0043	Business Plans	10 years
CX0046	Business Plans	10 years
CX0048	Business Plans	10 years
	Business Plans; Pricing Strategy	
CX0052	Information	10 years
CX0057	Business Plans	10 years
CX0059	Sensitive Personal Information	Indefinite
CX0066	Business Plans	10 years
CX0067	Business Plans	10 years
CX0068	Business Plans	10 years
CX0069	Business Plans	10 years
CX0071	Pricing Strategy Information	10 years
CX1000	Sensitive Personal Information	Indefinite
	Business Plans; Pricing Strategy	
CX1006	Information	10 years
CX1007	Business Plans	10 years
CX1009	Pricing Strategy Information	10 years
CX1010	Pricing Strategy Information	10 years
	Customer-Specific Price and Volume	,
CX1018	Information	10 years
	Business Plans; Pricing Strategy	,
CX1025	Information	10 years
CX1026	Business Plans	10 years
	Business Plans; Pricing Strategy	
CX1030	Information	10 years
CX1031	Pricing Strategy Information	10 years
CX1047	Pricing Strategy Information	10 years
	Customer-Specific Price and Volume	
CX1048	Information	10 years
CX1060	Business Plans	10 years
	Business Plans; Customer-Specific Price	
	and Volume Information; Information	
	Regarding Price-Setting Processes; Pricing	
CX1061	Strategy Information	10 years
CX1065	Business Plans	10 years
CX1067	Business Plans	10 years
CX1068	Business Plans	10 years

		Duration of in camera Treatment
Trial Ex. No.	Confidentiality Category	Requested
	Business Plans; Customer-Specific Price	
CX1069	and Volume Information	10 years
CX1071	Business Plans	10 years
CX1072	Business Plans	10 years
	Business Plans; Customer-Specific Price	
CX1076	and Volume Information	10 years
CX1078	Business Plans	10 years
CX1080	Pricing Strategy Information	10 years
CX1082	Sensitive Personal Information	Indefinite
CX1084	Pricing Strategy Information	10 years
CX1088	Pricing Strategy Information	10 years
	Customer-Specific Price and Volume	
CX1089	Information	10 years
CX1090	Business Plans	10 years
CX1096	Business Plans	10 years
CX1098	Business Plans	10 years
CX1099	Business Plans	10 years
CX1100	Pricing Strategy Information	10 years
CX1101	Pricing Strategy Information	10 years
	Business Plans; Sensitive Personal	
CX1102	Information	Indefinite
CX1109	Sensitive Personal Information	Indefinite
CX1110	Sensitive Personal Information	Indefinite
CX1111	Sensitive Personal Information	Indefinite
CX1115	Business Plans	10 years
CX1117	Business Plans	10 years
CX1118	Sensitive Personal Information	Indefinite
CX1119	Sensitive Personal Information	Indefinite
CX1126	Sensitive Personal Information	Indefinite
CX1127	Sensitive Personal Information	Indefinite
	Business Plans; Sensitive Personal	
CX1129	Information	Indefinite
	Customer-Specific Price and Volume	
CX1141	Information; Pricing Strategy Information	10 years
	Information Regarding Price-Setting	
CX1150	Processes	10 years
	Information Regarding Price-Setting	
CX1154	Processes	10 years
CX1159	Pricing Strategy Information	10 years
CX1161	Pricing Strategy Information	10 years

		Duration of in camera Treatment
Trial Ex. No.	Confidentiality Category	Requested
	Information Regarding Price-Setting	·
CX1172	Processes	10 years
CX1184	Pricing Strategy Information	10 years
	Information Regarding Price-Setting	
CX1185	Processes	10 years
CX1187	Pricing Strategy Information	10 years
	Customer-Specific Price and Volume	
CX1188	Information	10 years
	Business Plans; Pricing Strategy	
CX1218	Information	10 years
CX1222	Pricing Strategy Information	10 years
	Customer-Specific Price and Volume	
CX1225	Information	10 years
CX1237	Business Plans	10 years
	Business Plans; Sensitive Personal	
CX1239	Information	Indefinite
CX1244	Pricing Strategy Information	10 years
	Customer-Specific Price and Volume	
CX1248	Information	10 years
	Customer-Specific Price and Volume	
CX1262	Information	10 years
CX1269	Pricing Strategy Information	10 years
CX1278	Sensitive Personal Information	Indefinite
CX1281	Pricing Strategy Information	10 years
CX1286	Business Plans	10 years
CX1300	Business Plans	10 years
	Business Plans; Pricing Strategy	
CX1307	Information	10 years
	Business Plans; Pricing Strategy	
CX1309	Information	10 years
CX1316	Business Plans	10 years
CX1330	Pricing Strategy Information	10 years
CX1337	Business Plans	10 years
CX1351	Business Plans	10 years
	Customer-Specific Price and Volume	
CX1371	Information	10 years
	Business Plans; Pricing Strategy	
CX1374	Information	10 years
CX1380	Sensitive Personal Information	Indefinite
CX1381	Sensitive Personal Information	Indefinite
CX1382	Sensitive Personal Information	Indefinite
CX1384	Sensitive Personal Information	Indefinite

		Duration of in camera Treatment
Trial Ex. No.	Confidentiality Category	Requested
CX1385	Sensitive Personal Information	Indefinite
CX1386	Sensitive Personal Information	Indefinite
CX1387	Sensitive Personal Information	Indefinite
CX1389	Sensitive Personal Information	Indefinite
CX1390	Sensitive Personal Information	Indefinite
CX1391	Sensitive Personal Information	Indefinite
CX1392	Sensitive Personal Information	Indefinite
CX1393	Sensitive Personal Information	Indefinite
CX1394	Sensitive Personal Information	Indefinite
CX1395	Sensitive Personal Information	Indefinite
CX1396	Business Plans	10 years
CX1397	Sensitive Personal Information	Indefinite
CX1403	Business Plans	10 years
CX1413	Pricing Strategy Information	10 years
CX1414	Pricing Strategy Information	10 years
	Customer-Specific Price and Volume	,
CX1417	Information	10 years
CX1418	Business Plans	10 years
CX1421	Business Plans	10 years
CX1422	Business Plans	10 years
CX1423	Business Plans	10 years
	Business Plans; Sensitive Personal	
CX1437	Information	Indefinite
CX1439	Business Plans	10 years
CX1440	Business Plans	10 years
CX1441	Business Plans	10 years
CX1443	Business Plans	10 years
CX1444	Business Plans	10 years
CX1448	Business Plans	10 years
CX1457	Business Plans	10 years
CX1458	Business Plans	10 years
CX1463	Business Plans	10 years
CX1467	Business Plans	10 years
CX1473	Sensitive Personal Information	Indefinite
CX1498	Sensitive Personal Information	Indefinite
CX1499	Business Plans	10 years
CX1500	Sensitive Personal Information	Indefinite
CX1502	Business Plans	10 years
CX1505	Business Plans	10 years
CX1507	Business Plans	10 years
	Customer-Specific Price and Volume	
CX7100	Information	10 years

		Duration of in camera Treatment
Trial Ex. No.	Confidentiality Category	Requested
	Business Plans; Information Regarding	·
	Price-Setting Processes; Pricing Strategy	
CX8015	Information	10 years
	Business Plans; Information Regarding	·
	Price-Setting Processes; Pricing Strategy	
CX8037	Information	10 years
Benco's		
Transactional	Customer-Specific Price and Volume	
Data	Information	10 years
	Information Regarding Price-Setting	
RX0050	Processes; Pricing Strategy Information	10 years
	Information Regarding Price-Setting	
RX0059	Processes; Pricing Strategy Information	10 years
	Customer-Specific Price and Volume	
	Information; Information Regarding Price-	
	Setting Processes; Pricing Strategy	
RX0093	Information	10 years
	Business Plans; Pricing Strategy	
RX0101	Information	10 years
	Customer-Specific Price and Volume	
RX0130	Information	10 years
	Customer-Specific Price and Volume	
RX0209	Information; Pricing Strategy Information	10 years
	Information Regarding Price-Setting	
RX0248	Processes; Pricing Strategy Information	10 years
	Business Plans; Pricing Strategy	
RX0380	Information	10 years
RX0400	Pricing Strategy Information	10 years
	Customer-Specific Price and Volume	
RX0470	Information	10 years
RX0638	Pricing Strategy Information	10 years
RX1001	Business Plans	10 years
RX1003	Pricing Strategy Information	10 years
RX1010	Pricing Strategy Information	10 years
RX1011	Pricing Strategy Information	10 years
RX1015	Pricing Strategy Information	10 years

		Duration of in camera Treatment
Trial Ex. No.	Confidentiality Category	Requested
	Customer-Specific Price and Volume	
	Information; Information Regarding Price-	
	Setting Processes; Pricing Strategy	
RX1018	Information	10 years
	Business Plans; Customer-Specific Price	
	and Volume Information; Pricing Strategy	
RX1025	Information	10 years
RX1026	Business Plans	10 years
RX1031	Business Plans	10 years
	Information Regarding Price-Setting	
RX1032	Processes; Pricing Strategy Information	10 years
RX1034	Pricing Strategy Information	10 years
RX1048	Business Plans	10 years
RX1052	Business Plans	10 years
		,
	Information Regarding Price-Setting	
RX1053	Processes; Pricing Strategy Information	10 years
	Information Regarding Price-Setting	
RX1054	Processes; Pricing Strategy Information	10 years
	Business Plans; Pricing Strategy	
RX1072	Information	10 years
	Business Plans; Pricing Strategy	
RX1073	Information	10 years
	Business Plans; Pricing Strategy	
RX1074	Information	10 years
RX1077	Pricing Strategy Information	10 years
RX1080	Pricing Strategy Information	10 years
	Information Regarding Price-Setting	
RX1090	Processes	10 years
RX1092	Business Plans	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX1121	Information	10 years
	Business Plans; Information Regarding	<u>'</u>
	Price-Setting Processes; Pricing Strategy	
RX1122	Information	10 years
	Business Plans; Information Regarding	, , , ,
RX1124		10 years
RX1124	Price-Setting Processes; Pricing Strategy Information	10 years

		Duration of in camera Treatment
Trial Ex. No.	Confidentiality Category	Requested
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX1125	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX1126	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX1127	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX1128	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX1129	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX1130	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX1131	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX1132	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX1133	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX1134	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX1137	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX1138	Information	10 years
	Customer-Specific Price and Volume	
RX1140	Information	10 years
	Customer-Specific Price and Volume	
RX1141	Information	10 years
DV4.4.42	Customer-Specific Price and Volume	
RX1142	Information	10 years

		Duration of in camera Treatment
Trial Ex. No.	Confidentiality Category	Requested
	Customer-Specific Price and Volume	
RX2816	Information	10 years
	Customer-Specific Price and Volume	
RX2819	Information	10 years
	Customer-Specific Price and Volume	
RX2832	Information	10 years
	Customer-Specific Price and Volume	
RX2833	Information	10 years
	Customer-Specific Price and Volume	
RX2834	Information	10 years
	Customer-Specific Price and Volume	
RX2963	Information	10 years
	Customer-Specific Price and Volume	
RX2964	Information	10 years
	Customer-Specific Price and Volume	
RX2965	Information	10 years
	Customer-Specific Price and Volume	
RX2966	Information	10 years
	Customer-Specific Price and Volume	
RX2967	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX2969	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX2970	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX2971	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX2972	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX3030	Information	10 years
	Business Plans; Information Regarding	
	Price-Setting Processes; Pricing Strategy	
RX3049	Information	10 years