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

In the Matter of )
) )
Louisiana Real Estate Appraisers Board, ) DOCKET NO. 9374
) Respondents )
)

NON-PARTY SOLIDIFI US INC.'S
MOTION FOR IN CAMERA TREATMENT

Counsel for non-party Solidifi US Inc. ("Solidifi"), pursuant to Rule 3.45(b) of the Federal Trade Commission’s Rules of Practice. 16 C.F.R. § 3.45(b), respectfully moves this Court for in camera treatment for five years for nine competitively-sensitive, confidential business documents (the “Confidential Documents”).

Respectfully submitted,

/s Adam J. Biegel
Adam J. Biegel
Hilla Shimshoni
ALSTON & BIRD LLP
950 F Street, NW
Washington, DC 20004
Phone: (202) 239-3300
Adam.Biegel@alston.com
Hilla.Shimshoni@alston.com

Counsel for Non-Party
Solidifi US Inc.

DATED: March 12, 2021
UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of

)  )
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)  )
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Louisiana Real Estate Appraisers Board,  DOCKET NO. 9374

Respondents

NON-PARTY SOLIDIFI US INC.’S
MEMORANDUM OF LAW IN SUPPORT OF ITS
MOTION FOR IN CAMERA TREATMENT

Pursuant to Rule 3.45(b) of the Federal Trade Commission’s Rules of Practice. 16 C.F.R. § 3.45(b), counsel for non-party Solidifi US Inc. (“Solidifi”) submits this Memorandum of Law in support of Solidifi’s motion, filed this date, for in camera treatment for five years for 11 competitively-sensitive, confidential business documents (the “Confidential Documents”).

Counsel for The Federal Trade Commission (“FTC”) and counsel for Respondent Louisiana Real Estate Appraisers Board (“LREAB”) have stated that they do not intend to oppose Solidifi’s Motion. A corresponding Statement Regarding Meet and Confer is appended to this Memorandum.

Solidifi is an independent provider of valuation and closing services supporting the residential real estate mortgage industry. Solidifi produced the Confidential Documents in response to non-party subpoenas in this matter. The FTC has now notified Solidifi that it intends to introduce three of the Confidential Documents into evidence at the administrative trial in this matter, and Respondent LREAB has notified Solidifi that it intends to introduce eight of the Confidential Documents into evidence at the administrative trial in this matter. See Letter from the

1
FTC dated June 20, 2019 (attached as Exhibit A); Letter from LREAB dated June 19, 2019 (attached as Exhibit B).

The exhibits for which Solidifi is seeking in camera treatment are confidential business documents that contain information regarding Solidifi’s fees, methodology for setting the fees, and detailed geographic scope of operations. If these documents were to become part of the public record, Solidifi would be significantly harmed. For the reasons discussed in this motion, Solidifi respectfully requests that the Confidential Documents be afforded in camera treatment. In support of the motion, Solidifi relies on the Affidavit of Colleen McCafferty, Chief Compliance Officer at Solidifi ("McCafferty Declaration"), attached as Exhibit C, which provides additional details regarding the Confidential Documents.

I. The Documents for Which Protection is Sought

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</thead>
<tbody>
<tr>
<td>CX3274/1 RX0717</td>
<td>Letter from Colleen McCafferty to Lisa Kopchik to: File No. 161-0068, CID Issued to Solidifi US, Inc.</td>
<td>6/29/2016</td>
<td>FTC-PROD-0010269</td>
<td>FTC-PROD-0010275</td>
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<td>6/29/2016</td>
<td>FTC-PROD-0010240</td>
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</tr>
</tbody>
</table>

1 CX3274 also contains three documents marked “1. Solidifi – Database of Relevant Appraisals for LA”, “2. Solidifi – Database of Relevant Appraisals for SC” and “3. Solidifi - Customary and Reasonable Fee Floor - Test Methodology to January 4, 2016.” Of those, only the document markets as a number 1 is also provided by LREAB as an exhibit, marked as RX0712.

2 FTC-PROD-0010240 is also marked as “1. Solidifi – Database of Relevant Appraisals for LA”, and is identified by the FTC as part of CX3274 (with the date of 6/28/2016) (see above)
| RX0713 | Solidifi CID data spreadsheets | 6/29/2016 | FTC-PROD-0010243 | FTC-PROD-0010253 |
| RX0714 | Solidifi Compliance Committee Meeting minutes | 11/12/2015 | FTC-PROD-0010254 | FTC-PROD-0010258 |
| RX0715 | Solidifi Compliance Administration Committee Monthly Meeting Minutes | 6/29/2016 | FTC-PROD-0010259 | FTC-PROD-0010264 |
| RX0716 | Solidifi Appraiser FAQ - The Solidifi PerforMAX Appraiser Quality Score | 6/29/2016 | FTC-PROD-0010265 | FTC-PROD-0010268 |
| RX0718 | Solidifi Compliance Committee Meeting minutes | 2/1/2016 | FTC-PROD-0010259 | FTC-PROD-0010264 |
| RX0719 | Appraiser FAQ-- the Solidifi PerforMAX Appraiser Quality Score | 6/10/2014 | FTC-PROD-0010265 | FTC-PROD-0010268 |

Solidifi seeks *in camera* treatment for the following Confidential Documents, copies of which are attached under seal in Exhibit D.

II. Solidifi’s Documents are Secret and Material to Solidifi’s Business and Their Disclosure Would Result in Serious Injury to the Company

*In camera* treatment of material is appropriate when its “public disclosure will likely result in a clearly defined, serious injury to the person, partnership, or corporation requesting” such treatment. 16 C.F.R. § 3.45(b). The proponent demonstrates serious competitive injury by showing that the documents are secret and that they are material to the business. *In re 1-800 Contacts, Inc.*, No. 9372, 2017 FTC LEXIS 55, at *2-3 (Apr. 4, 2017); *In re Gen. Foods Corp.*, 95 F.T.C. 352, 355 (1980); *In re Dura Lube Corp.*, No. 9292, 1999 FTC. LEXIS 255, at *5 (Dec. 23, 1999). In this context, courts generally attempt “to protect confidential business information from unnecessary airing.” *H.P. Hood & Sons, Inc.*, 58 F.T.C. 1184, 1188 (1961).

In considering both secrecy and materiality, the Court may consider: (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 to guard the
secrecy of the information; (4) the value of the information to the business and its competitors; (5) the amount of effort or money expended in developing the information; and (6) the ease or difficulty with which the information could be acquired or duplicated by others. In re Bristol-Myers Co., 90 F.T.C. 455, 456-57 (1977). As discussed in the McCafferty Declaration, the Confidential Documents relate to Solidifi’s fees, its methodology for setting fees, and its geographic scope of operations. Such information is both secret and material to Solidifi’s business and, as set forth below, satisfies the standard for in camera treatment.

The Commission has recognized the propriety of granting in camera treatment to business records. See, e.g., In re McWane, Inc., No. 9351, 2012 WL 3862131, at *2 (F.T.C. Aug. 17, 2012); In re Champion Spark Plug Co., No. 9141, 1982 FTC LEXIS 85, at *2 (Apr. 5, 1982); H.P. Hood & Sons, Inc., 58 F.T.C. at 1188-89; In re Kaiser Aluminum & Chem. Corp., 103 F.T.C. 500, 500 (May 25, 1984). Thus, the information for which Solidifi seeks in camera treatment is eligible to receive it.

Solidifi has taken significant steps to protect the confidential information contained in the Confidential Documents, which was produced pursuant to compulsory processes and under the terms of the May 31, 2017, Protective Order Governing Confidential Material in this matter (the “Protective Order”) that was issued to protect the information contained in the Confidential Documents at question here. Pursuant to the Protective Order, Solidifi’s counsel designated the documents as “Confidential” to avoid any public disclosure. Furthermore, Solidifi takes substantial measures to guard the secrecy of the information contained in the Confidential Documents by limiting the dissemination of that information and taking every reasonable step to protect its confidentiality. The information contained in the Confidential Documents is generally only disclosed to Solidifi management and employees. As described in more detail in the McCafferty
Declaration, the information contained in the Confidential Documents relates to Solidifi’s fees and the methodology for setting those fees is not and would not otherwise become publicly available.

Finally, Solidifi’s status as a non-party is relevant to the treatment of its documents. The FTC has held that “[t]here can be no question that the confidential records of businesses involved in Commission proceedings should be protected insofar as possible.” H.P. Hood & Sons, 58 F.T.C. at 1186. This is especially so in the case of a non-party, which deserves “special solicitude” in its request for in camera treatment for its confidential business information. See In re Kaiser Aluminum, 103 F.T.C. at 500 (“As a policy matter, extensions of confidential or in camera treatment in appropriate cases involving third party bystanders encourages cooperation with future adjudicative discovery requests.”). Solidifi’s non-party status therefore weighs in favor of granting in camera status to the Confidential Documents.

III. IN CAMERA PROTECTION SHOULD EXTEND FOR FIVE YEARS

Because of the highly confidential and proprietary nature of the information contained in the Confidential Documents – competitively significant information that Solidifi continues to use and considers key to its business strategies, performance, and ongoing operations – lasting protection is appropriate in order to ensure avoidance of the competitive injuries to Solidifi’s business outlined above. See In re 1-800 Contacts, 2017 FTC LEXIS 55, at *3, *8 (recognizing that in camera treatment is appropriate where the material remains “competitively sensitive.”). As the Commission has previously recognized, if such Confidential Documents are disclosed, Solidifi will lose the advantages that it currently enjoys based on its efforts to maintain the confidentiality of the information contained in the Confidential Documents. In re Otto Bock Healthcare N. Am., Inc., No. 9378, 2018 FTC LEXIS 111, at *11 (July 6, 2018) (granting in camera treatment for five years from time of order to non-party’s ordinary course business documents, including documents
containing product level sales data and pricing information); In re 1-800 Contacts, 2017 FTC LEXIS 55, at *2-3. Therefore, and in recognizing the presumption of a public trial in this proceeding, Solidifi respectfully requests that the information contained in the Confidential Documents be afforded narrow in camera protection, limited to a period of five years.

IV. Conclusion

For the reasons set forth above and in the accompanying McCafferty Declaration, Solidifi respectfully requests that this Court grant in camera treatment for five years for the information contained in the Confidential Documents.

Respectfully submitted,

/s Adam J. Biegel
Adam J. Biegel
Hilla Shimshoni
ALSTON & BIRD LLP
950 F Street, NW
Washington, DC 20004
Phone: (202) 239-3300
Adam.Biegel@alston.com
Hilla.Shimshoni@alston.com

Counsel for Non-Party
Solidifi US Inc.

DATED: March 12, 2021
STATEMENT REGARDING MEET AND CONFER

The undersigned certifies that counsel for non-party Solidifi US Inc. ("Solidifi") notified
counsel for the parties via telephone on or about July 25, 2019, and via email on or about March
11, 2021, that it would be seeking in camera treatment of the Confidential Documents. Both
counsel for the Federal Trade Commission and counsel for Respondent Louisiana Real Estate
Appraisers Board indicated that they did not intend to oppose Solidifi’s motion.

Respectfully submitted,

/s Adam J. Biegel
Adam J. Biegel
Hilla Shimshoni
ALSTON & BIRD LLP
950 F Street, NW
Washington, DC 20004
Phone: (202) 239-3300
Adam.Biegel@alston.com
Hilla.Shimshoni@alston.com

Counsel for Non-Party
Solidifi US Inc.

DATED: March 12, 2021
EXHIBIT A
June 20, 2019

VIA EMAIL

Solidifi Inc.
c/o Colleen McCafferty, Esq.
Vice President, Compliance
cmccafferty@solidifi.com
701 Seneca St. Ste. 660
Buffalo, NY 14210

RE: In re Louisiana Real Estate Appraisers Board, FTC Dkt. No. 9374

Dear Ms. McCafferty:

By this letter we are providing formal notice, pursuant to Rule 3.45(b) of the Commission’s Rules of Practice, 16 C.F.R. § 3.45(b), that Complaint Counsel intend to offer the documents and testimony referenced in the enclosed Attachment A into evidence in the administrative trial in the above-captioned matter. The administrative trial is currently scheduled to begin on September 17, 2019. All exhibits admitted into evidence become part of the public record unless in camera status is granted by Administrative Law Judge D. Michael Chappell.

For documents or testimony that include sensitive or confidential information that you do not want on the public record, you must file a motion seeking in camera status or other confidentiality protections pursuant to 16 C.F.R §§ 3.45, 4.10(g). Judge Chappell may order that materials, whether admitted or rejected as evidence, be placed in camera only after finding that their public disclosure will likely result in a clearly defined, serious injury to the person, partnership, or corporation requesting in camera treatment.

Motions for in camera treatment for evidence to be introduced at trial must meet the strict standards set forth in 16 C.F.R. § 3.45 and explained in In re 1-800 Contacts, Inc., 2017 FTC LEXIS 55 (April 4, 2017); In re Jerk, 2015 FTC LEXIS (Feb. 23, 2015); and In re Basic Research, Inc., 2006 FTC LEXIS 14 (Jan. 25, 2006). Motions also must be supported by a declaration or affidavit by a person qualified to explain the confidential nature of the documents. In re North Texas Specialty Physicians, 2004 FTC LEXIS 66 (April 23, 2004). You must also provide one copy of the documents for which in camera treatment is sought to the Administrative Law Judge.
Colleen McCafferty, Esq.
June 20, 2019
Page 2

Under the operative Fourth Revised Scheduling Order, your deadline for filing motions seeking in camera treatment is **August 2, 2019**.

If you have any questions, please feel free to contact me at (202) 326-3695.

Sincerely,

/s/ J. Alexander Ansaldo
J. Alexander Ansaldo
Counsel Supporting the Complaint
Attachment A
<table>
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<tr>
<th>Exhibit No.</th>
<th>Description</th>
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<th>Bates - Begin</th>
<th>Bates - End</th>
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<td>- Test Methodology to January 4,</td>
<td>Test Methodology to January 4, 2016&quot;</td>
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EXHIBIT B
June 19, 2019

Via E-Mail and Mail
Mark Pawelek
Chief Compliance Officer
Solidifi US Inc.
701 Seneca Street
Moon Township, PA 15108

Re: In the Matter of Louisiana Real Estate Appraisers Board, FTC Dkt. 9374

Dear Mr. Pawelek,

This letter will constitute notice to Solidifi US Inc., pursuant to 16 C.F.R. § 3.45(b) and paragraph 7 of the July 6, 2017 Scheduling Order in the above-captioned matter, that Respondent Louisiana Real Estate Appraisers Board (“LREAB”) intends to use the materials referenced on the attached Exhibit A as evidence at the administrative trial scheduled to begin on September 17, 2019. All exhibits admitted into evidence become part of the public record unless in camera treatment is granted by Administrative Law Judge D. Michael Chappell.

Pursuant to 16 C.F.R. § 3.45, for documents or testimony that you believe include sensitive or confidential information that you do not want on the public record, you must file a motion for in camera status with Judge Chappell. As indicated in paragraph 7 of the July 6, 2017 Scheduling Order, motions for in camera treatment for evidence to be introduced at trial must meet the strict standards set forth in 16 C.F.R. § 3.45, explained in In re I-800 Contacts, Inc., 2017 FTC LEXIS 55 (April 4, 2017); In re Jerk, LLC, 2015 FTC LEXIS (Feb. 23, 2015); In re Basic Research, Inc., 2006 FTC LEXIS 14 (Jan. 25, 2006). Motions also must be supported by a declaration or affidavit by a person qualified to explain the confidential nature of the documents. In re I-800 Contacts, Inc., 2017 FTC LEXIS 55 (April 4, 2017); In re North Texas Specialty Physicians, 2004 FTC LEXIS 66 (April 23, 2004). Each party or non-party that files a motion for in camera treatment shall provide one copy of the documents for which in camera treatment is sought to the Administrative Law Judge.
June 19, 2019

Page 2

Under the Fourth Revised Scheduling Order dated March 26, 2019, the deadline for filing motions seeking in camera status is **August 2, 2019**.

Please contact me via email or at (202) 204-3518 if you have any questions regarding the foregoing.

Best regards,

/s/ James J. Kovacs
James J. Kovacs
EXHIBIT A
<table>
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<th>Exhibit #</th>
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<td>FTC-PROD-0010254</td>
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<td>5/26/2017</td>
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EXHIBIT C
In the Matter of)

Louisiana Real Estate Appraisers Board,

Respondents

DEPARTMENT OF COMMERCE
OFFICE OF THE SECRETARY

DECLARATION OF COLLEEN MCCAFFERTY
IN SUPPORT OF NON-PARTY SOLIDIFI US INC.’S
MOTION FOR IN CAMERA TREATMENT

I, Colleen McCafferty, hereby declare as follows:

1. I am the Chief Compliance Officer at Solidifi US Inc. (“Solidifi”). I make this declaration in support of non-party Solidifi’s Motion for in camera treatment for certain documents (the “Motion”).

2. I have personal knowledge of the matters stated herein and, if called upon to do so, could competently testify about them.

3. Solidifi is an independent provider of valuation and closing services supporting the residential real estate mortgage industry.

4. I have reviewed and am familiar with the documents Solidifi produced in the above-captioned matter in response to subpoenas from the Federal Trade Commission (“FTC”) and the Louisiana Real Estate Appraisers Board (“LREAB”). Given my position at Solidifi, I am familiar with the type of information contained in the documents at issue and its competitive significance to Solidifi. Based on my review of the documents, my knowledge of Solidifi’s business, and my familiarity with the confidentiality protection afforded this type of information by Solidifi, the disclosure of these documents to the public and to competitors of Solidifi would cause serious, irreparable competitive injury to Solidifi.
5. The FTC has notified Solidifi that it intends to introduce three competitively-sensitive, confidential documents that Solidifi produced in response to the subpoenas into evidence at the administrative trial in this matter, and Respondent LREAB has notified Solidifi that it intends to introduce eight of Solidifi’s competitively-sensitive, confidential documents into evidence at the administrative trial in this matter. As described in the Motion, Solidifi seeks *in camera* protection for the information related to Solidifi’s fees, the methodology for setting the fee contained, and the detailed geographic scope of operations in these documents which are listed below.

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1 CX3274 also contains three documents marked “1. Solidifi – Database of Relevant Appraisals for LA”, “2. Solidifi – Database of Relevant Appraisals for SC” and “3. Solidifi - Customary and Reasonable Fee Floor - Test Methodology to January 4, 2016.” Of those, only the document markets as s number 1 is also provided by LREAB as an exhibit, marked as RX0712.
2 FTC-PROD-0010240 is also marked as “1. Solidifi – Database of Relevant Appraisals for LA”, and is identified by the FTC as part of CX3274 (with the date of 6/28/2016) (see above)
6. Publicly disclosing any of Solidifi’s confidential financial and strategic information is not necessary in this proceeding and could be detrimental to Solidifi, whose only involvement in this proceeding is as a non-party.

7. Solidifi has taken significant steps to protect the confidential information contained in the documents identified above. Solidifi takes substantial measures to guard the secrecy of this confidential information by limiting the dissemination of the information and taking every reasonable step to protect its confidentiality. The information is only disclosed to Solidifi management and employees as needed and appropriate. The information is not, and would not, otherwise become publicly available.

8. CX3274/RX0717 contains Solidifi’s confidential, written response to the FTC’s Civil Investigative Demand (“CID”). The response contains confidential information regarding Solidifi’s methodology for setting the fees that Solidifi pays to appraisers. Disclosure of information regarding Solidifi’s methodology for setting the fees could have a material impact on Solidifi’s ability to conduct its business and its ability to compete. Disclosure of this information could also be used by Solidifi’s competitors to analyze Solidifi’s place in the market and its confidential business strategies, giving those competitors an unfair competitive advantage over Solidifi. Therefore, the information related to Solidifi’s methodology for setting the fees that Solidifi pays to appraisers should be given in camera protection.

9. RX0712, RX0713, “1. Solidifi - Database of Relevant Appraisals for LA” and “2. Solidifi - Database of Relevant Appraisals for SC” contain confidential information regarding the fees that Solidifi pays to appraisers as well as detailed geographic scope of operations, pulled from a confidential database maintained by Solidifi,. It would very difficult, if not impossible, for anyone outside of Solidifi to recreate this information. Disclosure of information regarding the
fees that Solidifi pays to appraisers could have a material impact on Solidifi’s ability to conduct its business and its ability to compete. Even though the fees are several years old, disclosure of this information could still be used by Solidifi’s competitors to analyze Solidifi’s current place in the market, the scope and details of its appraisal operations including detailed geographic footprint, and its confidential business strategies, giving those competitors an unfair competitive advantage over Solidifi. Therefore, the information related to the fees that Solidifi pays to appraisers should be given in camera protection.

10. RX0714, RX0715, and RX0718 contain confidential meeting minutes from Solidifi’s Compliance Administration Committee. The meeting minutes contain confidential information regarding Solidifi’s methodology for setting the fees that Solidifi pays to appraisers. Disclosure of information regarding Solidifi’s methodology for setting the fees could have a material impact on Solidifi’s ability to conduct its business and its ability to compete. Disclosure of this information could also be used by Solidifi’s competitors to analyze Solidifi’s place in the market and its confidential business strategies, giving those competitors an unfair competitive advantage over Solidifi. Therefore, the information related to Solidifi’s methodology for setting the fees that Solidifi pays to appraisers should be given in camera protection.

11. RX0716 and RX0719 contain confidential documents that Solidifi provides to its appraisers regarding Solidifi’s methodology for setting the fees that Solidifi pays to appraisers. Disclosure of information regarding Solidifi’s methodology for setting the fees could have a material impact on Solidifi’s ability to conduct its business and its ability to compete. Disclosure of this information could also be used by Solidifi’s competitors to analyze Solidifi’s place in the market and its confidential business strategies, giving those competitors an unfair competitive advantage over Solidifi. Therefore, the information related to Solidifi’s methodology for setting the fees that Solidifi pays to appraisers should be given in camera protection.
12. Pursuant to 28 U.S.C. § 1746, I declare, under the penalty of perjury under the laws of the United States of America, that the foregoing is true and correct to the best of my knowledge, information, and belief.

[Signature]

Colleen McCaffrey
Chief Compliance Officer
Solidifi US Inc.

Signed this 10th day of March 2021.
EXHIBIT D

DOCUMENTS MARKED CONFIDENTIAL
REDACTION IN THEIR ENTIRETY REQUESTED
CERTIFICATE OF SERVICE

I, Hilla Shimshoni, declare under penalty of perjury that the following is true and correct.

On March 12, 2021, I caused to be served the following documents on the parties listed below by the manner indicated:

- Non-Party Solidifi US Inc.’s Motion for In Camera Treatment, with accompanying Memorandum of Law and all Exhibits, and Statement Regarding Meet and Confer
- [Proposed] Order Granting In Camera Treatment

The Office of the Secretary (via FTC E-Filing System (public version) and email (non-public version))
April Tabor
Acting Secretary
Office of the Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-172
Washington, DC 20580
ElectronicFilings@ftc.gov

The Office of the Administrative Law Judge (via FTC E-Filing System (public version) and email (non-public version))
The Honorable D, Michael Chappell
Chief Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-106
Washington, DC 20580

Complaint Counsel for Federal Trade Commission (via FTC E-Filing System (public version) and email (non-public version))
Daniel J. Matheson
Lisa B. Kopchik
J. Alexander Ansaldo
Wesley G. Carson
Nathaniel M. Hopkin
Kenneth H. Merber
Thomas H. Brock Federal Trade Commission
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jansaldo@ftc.gov
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Counsel for Louisiana Real Estate Appraisers Board (via FTC E-Filing System (public version) and email (non-public version))
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James J. Kovacs
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sgreenstein@constantinecannon.com
rlevine@constantinecannon.com
asheedy@constantinecannon.com
jkovacs@constantinecannon.com
wfore@constantinecannon.com

/s Hilla Shimshoni
CERTIFICATE FOR ELECTRONIC FILING

I, Hilla Shimshoni, 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 parties and adjudicator.

Dated: March 12, 2021.

/s Hilla Shimshoni
**NON-PARTY SOLIDIFI US INC.’s**

[PROPOSED] ORDER

Upon consideration of non-party Solidifi US Inc. ("Solidifi") Motion for *In Camera* Treatment, IT IS HEREBY ORDERED that the following documents are to be provided *in camera* treatment under 16 C.F.R. § 3.45 for five years from the date of this order.

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>CX3274/ RX0712</td>
<td>Spreadsheet: Solidifi's CID Response (Spec. 1) / Solidifi CID data spreadsheets</td>
<td>6/29/2016</td>
<td>FTC-PROD-0010240</td>
<td>FTC-PROD-0010240</td>
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<td>RX0713</td>
<td>Solidifi CID data spreadsheets</td>
<td>6/29/2016</td>
<td>FTC-PROD-0010243</td>
<td>FTC-PROD-0010253</td>
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<td>RX0714</td>
<td>Solidifi Compliance Committee Meeting minutes</td>
<td>11/12/2015</td>
<td>FTC-PROD-0010254</td>
<td>FTC-PROD-0010258</td>
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<td>RX0715</td>
<td>Solidifi Compliance Administration Committee Monthly Meeting Minutes</td>
<td>6/29/2016</td>
<td>FTC-PROD-0010259</td>
<td>FTC-PROD-0010264</td>
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<td>RX0716</td>
<td>Solidifi Appraiser FAQ - The Solidifi PerforMAX Appraiser Quality Score</td>
<td>6/29/2016</td>
<td>FTC-PROD-0010265</td>
<td>FTC-PROD-0010268</td>
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<td>RX0718</td>
<td>Solidifi Compliance Committee Meeting minutes</td>
<td>2/1/2016</td>
<td>FTC-PROD-0010259</td>
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<td>RX0719</td>
<td>Appraiser FAQ-- the Solidifi PerforMAX Appraiser Quality Score</td>
<td>6/10/2014</td>
<td>FTC-PROD-0010265</td>
<td>FTC-PROD-0010268</td>
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</table>

**ORDERED:**

The Honorable D. Michael Chappell  
Chief Administrative Law Judge

Date: