

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

\_\_\_\_\_  
In the Matter of )  
 )  
Louisiana Real Estate Appraisers Board, )  
 )  
 Respondents )  
\_\_\_\_\_ )

DOCKET NO. 9374

**NON-PARTY AMROCK INC.'S  
MOTION FOR *IN CAMERA* TREATMENT**

Counsel for non-party Amrock Inc. (“Amrock”), 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 three 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  
Amrock Inc.*

DATED: March 12, 2021

**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 AMROCK 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 Amrock Inc. (“Amrock” or “the Company”) submits this Memorandum of Law in support of Amrock’s motion, filed this date, for *in camera* treatment for five years for three competitively-sensitive, confidential business documents (the “Confidential Documents”). Amrock, formerly known as Title Source Inc. (“Title Source”), is an independent company offering title insurance, property valuations and closing services.

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 Amrock’s Motion. A corresponding Statement Regarding Meet and Confer is appended to this Memorandum.

Title Source produced the Confidential Documents in response to non-party subpoenas in this matter. The FTC has now notified Amrock that it intends to introduce one of the Confidential Documents into evidence at the administrative trial in this matter, and Respondent LREAB has notified Amrock that it intends to introduce three of the Confidential Documents into evidence at

the administrative trial in this matter. *See* Letter from the FTC dated June 20, 2019 (attached as Exhibit A); Letter from LREAB dated June 19, 2019 (attached as Exhibit B).

The exhibits for which Amrock is seeking *in camera* treatment are confidential business documents that contain information regarding Title Source’s fees, methodology for setting the fees, and detailed geographic scope of operations. If these documents were to become part of the public record, Amrock would be significantly harmed. For the reasons discussed in this motion, Amrock respectfully requests that the Confidential Documents be afforded *in camera* treatment. In support of the motion, Amrock relies on the Affidavit of Andy Goldberg, Senior Corporate Counsel at Amrock (“Goldberg Declaration”), attached as Exhibit C, which provides additional details regarding the Confidential Documents.

**I. The Documents for Which Protection is Sought**

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

<b>Exhibit No.</b>	<b>Document Title/Description</b>	<b>Date</b>	<b>Beginning Bates No.</b>	<b>Ending Bates No.</b>
CX3337/ RX0736 <sup>1</sup>	Document: Answer to FTC CID Question No. 3	07/18/2016	FTC-PROD-0010391	FTC-PROD-0010398
RX0735	Letter from Andy Goldberg to Lisa Kopchik re: File No. 161-0068/CID	07/18/2016	FTC-PROD-0010381	FTC-PROD-0010382
RX0737	Title Source CID data spreadsheet	07/18/2016	FTC-PROD-0010399	FTC-PROD-0010399

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<sup>1</sup> Both parties have notified the Company that they intend to introduce Title Source’s written response to Question 3 to the FTC’s Civil Investigative Demand (“CID”) letter. However, the range of bates numbers cited by LREAB also contains Title Source’s responses to additional CID questions. *In camera* treatment is requested for the entire exhibit as identified by LREAB for reasons outlined in detail in the Motion and in the accompanying declaration.

## II. Title Source's Documents are Secret and Material to Amrock'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 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 Goldberg Declaration, the Confidential Documents relate to Title Source's fees, its methodology for setting the fees, and its geographic scope of operations. Such information is both secret and material to Amrock'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 Amrock seeks *in camera* treatment is eligible to receive it.

Amrock 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, Title Source’s counsel designated the documents as “Confidential” to avoid any public disclosure. Furthermore, Amrock 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 only disclosed to Amrock management and employees. As described in more detail in the Goldberg Declaration, the information contained in the Confidential Documents relates to Amrock’s fees and the methodology for setting those fees is not and would not otherwise become publicly available.

Finally, Amrock’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.”). Amrock’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 Amrock 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 Amrock’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, Amrock 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, Amrock 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 Goldberg Declaration, Amrock 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

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Hilla.Shimshoni@alston.com

*Counsel for Non-Party  
Amrock Inc.*

DATED: March 12, 2021

## STATEMENT REGARDING MEET AND CONFER

The undersigned certifies that counsel for non-party Amrock Inc. (“Amrock”) 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 Amrock’s motion.

Respectfully submitted,

/s Adam J. Biegel

Adam J. Biegel  
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Adam.Biegel@alston.com  
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*Counsel for Non-Party  
Amrock Inc.*

DATED: March 12, 2021

# **EXHIBIT A**



Bureau of Competition  
Anticompetitive Practices Division

UNITED STATES OF AMERICA  
Federal Trade Commission  
WASHINGTON, D.C. 20580

June 20, 2019

**Via E-Mail**

Title Source, Inc.  
c/o Adam Biegel, Esq.  
adam.biegel@alston.com

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

Dear Mr. Biegel:

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.

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) 326-2435.

Sincerely,

/s/ Nathaniel Hopkin

Nathaniel M. Hopkin

Counsel Supporting the Complaint

# Attachment A

<b>Exhibit No.</b>	<b>Description</b>	<b>Date</b>	<b>Bates - Begin</b>	<b>Bates - End</b>
CX3337	Document: Answer to FTC CID Question No. 3	00/00/0000	FTC-PROD-0010391	FTC-PROD-0010391

# **EXHIBIT B**

CONSTANTINE CANNON LLP

WASHINGTON | NEW YORK | SAN FRANCISCO | LONDON

**James J. Kovacs**

Attorney

202-204-3518

jkovacs@constantinecannon.com

June 19, 2019

**Via E-Mail and Mail**

Andy Goldberg

Associate Counsel

Amrock

662 Woodward Avenue

Detroit, MI 48226

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

Dear Mr. Goldberg,

This letter will constitute notice to Title Source, 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.

## CONSTANTINE CANNON LLP

WASHINGTON | NEW YORK | SAN FRANCISCO | LONDON

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

## CONSTANTINE CANNON LLP

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June 19, 2019  
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# EXHIBIT A

## CONSTANTINE CANNON LLP

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June 19, 2019

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Exhibit #	Description	Date	Beg Bates	End Bates
RX0735	Letter from Andy Goldberg to Lisa Kopchik re: File No. 161-0068/CID	7/18/2016	FTC-PROD-0010381	FTC-PROD-0010382
RX0736	Title Source Attached 3 Answer to FTC CID Question No. 3	7/18/2016	FTC-PROD-0010391	FTC-PROD-0010398
RX0737	Title Source CID data spreadsheet	7/18/2016	FTC-PROD-0010399	FTC-PROD-0010399

# EXHIBIT C

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

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

**DECLARATION OF ANDY GOLDBERG  
IN SUPPORT OF NON-PARTY AMROCK INC.’S  
MOTION FOR *IN CAMERA* TREATMENT**

I, Andy Goldberg, hereby declare as follows:

1. I am Senior Corporate Counsel at Amrock Inc. (“Amrock”). Amrock, formerly known as Title Source Inc. (“Title Source”), is an independent company offering title insurance, property valuations and closing services.

2. I make this declaration in support of non-party Amrock’s Motion for *in camera* treatment for certain documents (the “Motion”).

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

4. I have reviewed and am familiar with the documents Title Source produced in the above-captioned matter in response to a Civil Investigative Demand from the Federal Trade Commission (“FTC”) and a subpoena from the Louisiana Real Estate Appraisers Board (“LREAB”). Given my position at Amrock, I am familiar with the type of information contained in the documents at issue and its competitive significance to Amrock. Based on my review of the documents, my knowledge of Amrock’s business, and my familiarity with the confidentiality protection afforded this type of information by Amrock, the disclosure of these documents to the

public and to competitors of Amrock would cause serious, irreparable competitive injury to Amrock.

5. The FTC has notified Amrock that it intends to introduce one of the documents that Amrock produced to the FTC and the LREAB into evidence at the administrative trial in this matter, and Respondent LREAB has notified Amrock that it intends to introduce three of the Confidential Documents into evidence at the administrative trial in this matter. As described in the Motion, Amrock seeks *in camera* protection for the information related to Title Source’s appraisal operations, including fees and the methodology for setting the fee contained in these documents, which are listed below.

<b>Exhibit No.</b>	<b>Document Title/Description</b>	<b>Date</b>	<b>Beginning Bates No.</b>	<b>Ending Bates No.</b>
CX3337/ RX0736 <sup>1</sup>	Document: Answer to FTC CID Question No. 3	07/18/2016	FTC-PROD-0010391	FTC-PROD-0010398
RX0735	Letter from Andy Goldberg to Lisa Kopchik re: File No. 161-0068/CID	07/18/2016	FTC-PROD-0010381	FTC-PROD-0010382
RX0737	Title Source CID data spreadsheet	07/18/2016	FTC-PROD-0010399	FTC-PROD-0010399

6. Publicly disclosing any of Title Source’s confidential financial and strategic information is not necessary in this proceeding and could be detrimental to Amrock, whose only involvement in this proceeding is as a non-party.

7. Amrock has taken significant steps to protect the confidential information contained in the documents identified above. Amrock takes substantial measures to guard the

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<sup>1</sup> Both parties have notified the Company that they intend to introduce Title Source’s written response to Question 3 to the FTC’s Civil Investigative Demand (“CID”) letter. However, the range of bates numbers cited by LREAB also contains Title Source’s responses to additional CID questions. *In camera* treatment is requested for the entire exhibit as identified by LREAB for reasons outlined in detail in the Motion and in this declaration.

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 Amrock management and employees as needed and appropriate. The information is not, and would not, otherwise become publicly available.

8. CX3337/RX0736 and RX0735 contain Title Source's confidential, written response to the FTC's Civil Investigative Demand ("CID"). The response contains confidential information regarding Title Source's methodology for setting the fees that Amrock pays to appraisers. Disclosure of information regarding Amrock's methodology for setting the fees could have a material impact on Amrock's ability to conduct its business and its ability to compete. Disclosure of this information could also be used by Amrock's competitors to analyze Amrock's place in the market and its confidential business strategies, giving those competitors an unfair competitive advantage over Amrock. Therefore, the information related to Amrock's methodology for setting the fees that Amrock pays to appraisers should be given *in camera* protection.

9. RX0737 contains confidential information regarding the fees that Title Source paid to appraisers, pulled from a confidential database maintained by Title Source. It would be very difficult, if not impossible, for anyone outside of Amrock to recreate this information. Disclosure of information regarding the fees that Title Source paid to appraisers could have a material impact on Amrock'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 Amrock's competitors to analyze Amrock'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 Amrock. Therefore, the information related to the fees that Title Source paid to appraisers should be given *in camera* protection.

10. Pursuant to 28 U.S.C. § 1746, I declare, under the penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information, and belief.

  
Andy Goldberg  
Senior Corporate Counsel  
Amrock Inc.

Signed this 10<sup>th</sup> 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 Amrock 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](mailto: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))**

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[wfore@constantinecannon.com](mailto: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

**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 AMROCK INC.’S  
[PROPOSED] ORDER**

Upon consideration of non-party Amrock Inc. (“Amrock”) 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.

<b>Exhibit No.</b>	<b>Document Title/Description</b>	<b>Date</b>	<b>Beginning Bates No.</b>	<b>Ending Bates No.</b>
CX3337/ RX0736	Document: Answer to FTC CID Question No. 3	07/18/2016	FTC-PROD-0010391	FTC-PROD-0010398
RX0735	Letter from Andy Goldberg to Lisa Kopchik re: File No. 161-0068/CID	07/18/2016	FTC-PROD-0010381	FTC-PROD-0010382
RX0737	Title Source CID data spreadsheet	07/18/2016	FTC-PROD-0010399	FTC-PROD-0010399

**ORDERED:**

\_\_\_\_\_  
 The Honorable D. Michael Chappell  
 Chief Administrative Law Judge

Date: