

PUBLIC

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

**In the matter of**

**H&R BLOCK INC.,**  
a corporation,

**HRB DIGITAL LLC,**  
a limited liability company, and

**HRB TAX GROUP, INC.,**  
a corporation.

**DOCKET NO. 9427  
PUBLIC VERSION**

**RESPONDENTS' MOTION FOR *IN CAMERA* TREATMENT**

Respondents H&R Block Inc., HRB Digital LLC, and HRB Tax Group, Inc. (“H&R Block”) move for *in camera* treatment of certain proposed trial exhibits in whole or in part, including confidential portions of deposition testimony and certain anticipated live testimony topics, pursuant to 16 C.F.R. § 3.45(b). These documents, transcripts, and testimony contain highly sensitive, confidential information, and public disclosure would likely cause H&R Block a clearly defined, serious injury.

Since the inception of the Federal Trade Commission’s investigation in 2019, H&R Block has produced nearly 50,000 documents and six fact witnesses for depositions. Some of those documents and deposition transcripts are included in the parties’ proposed exhibit lists<sup>1</sup> and are entitled to confidential, *in camera* treatment under the Court’s February 26, 2024 Protective Order and 16 C.F.R. § 3.45(b). Specifically, H&R Block has identified six key groups of documents and

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<sup>1</sup> Complaint Counsel’s exhibit list contains over 800 documents—far more than the number of documents that could be introduced in the 40 hours of trial in this matter. *See* Scheduling Order ¶ 25.

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testimony that would cause a serious competitive injury if publicly disclosed, including trade secrets, internal user data and financial information, sales and marketing strategy, pricing strategy, business development strategy, and taxpayer personal information. H&R Block requests that documents and testimony falling within these categories—or, in some cases, only portions of those documents and testimony<sup>2</sup>—receive *in camera* treatment at the final hearing in the matter. The Court has previously recognized the competitively sensitive nature of certain of these documents and Complaint Counsel has agreed that certain categories of information deserve *in camera* treatment.<sup>3</sup> See Order on: (1) Motion to Remove Redactions from Paragraphs 29 Through 32 of the Public Complaint, and (2) Unopposed Motion to Remove Certain Redactions from the Public Complaint, Docket No. 9427 (May 8, 2024). Accordingly, this Motion should be granted.

### **LEGAL STANDARD**

“[C]onfidential records of businesses involved in Commission proceedings should be protected insofar as possible.” *In re H.P Hood & Sons, Inc.*, 58 F.T.C. 1184, 1961 WL 65882, at \*2 (F.T.C. 1961). *In camera* treatment applies to information when “public disclosure will likely result in a clearly defined, serious injury.” 16 C.F.R. 3.45(b). Serious injury occurs when documents that are “sufficiently secret and sufficiently material to [Respondent’s] business” are disclosed to the public. *In re Otto Bock Healthcare N. Am.*, 2018 WL 3491602, at \*1 (July 2, 2018) (quoting *In re Gen. Foods Corp.*, 95 F.T.C. 352, 1980 WL 338997, at \*4 (F.T.C. 1980)).

Secrecy and materiality turn on:

- (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;

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<sup>2</sup> Where H&R Block seeks partial *in camera* treatment, it has identified those portions in yellow highlighting in the exhibit copies submitted with this Motion.

<sup>3</sup> Complaint Counsel agrees that H&R source code should receive *in camera* treatment.

- (3) the extent of measures taken to guard the secrecy of the information;
- (4) the value of the information to the business and to 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 properly acquired or duplicated by others.

*In re Bristol-Meyers Co.*, 90 F.T.C. 455, 1977 WL 189054, at \*2 (F.T.C. 1977).

Once a party shows that disclosure of confidential information will cause serious injury “the principal countervailing consideration weighing in favor of disclosure” becomes the “importance of the information in explaining the rationale of decisions at the Commission.” *In the Matter of ProMedica Health Sys.*, 2011 WL 2258040, at \*1 (May 25, 2011) (quoting *In the Matter of Gen. Foods Corp.*, 95 F.T.C. 352, 1980 WL 338997, at \*3 (F.T.C. 1980)).

The ALJ has broad discretion to grant *in camera* status. *In the Matter of Gen. Foods Corp.*, 96 F.T.C. 168, 1980 WL 339035, at \*2 (F.T.C. 1980). Courts agree that *in camera* treatment may be appropriate for trade secrets, such as secret formulas, processes, secret technical information, or information that is privileged, *H.P. Hood & Sons, Inc.*, 58 F.T.C. 1184 (1961); *in camera* treatment may also be appropriate for business plans, marketing plans, and sales documents, *Otto Bock Healthcare N. Am., Inc., A Corp., Respondent.*, No. 9378, 2018 WL 3491602, at \*2 (F.T.C. July 2, 2018). Similarly, *in camera* treatment is appropriate “sensitive personal information” including an individual’s taxpayer identification number, financial account number, and date of birth. There is a presumption that *in camera* treatment will not be accorded to information that is more than three years old, but that presumption can be overcome. *In the Matter of Impax Labs, Inc.*, 2017 WL 4810534, at \*1 (Oct. 16, 2017).

## ARGUMENT

H&R Block seeks *in camera* treatment of documents and testimony—or portions thereof,—that fall into one of six categories: (1) trade secrets and product development, (2) internal user data and financial information, (3) sales and marketing strategy, (4) pricing and pricing strategy, (5) business development strategy, and (6) taxpayer’s personal information. Public disclosure of the identified documents and testimony would cause serious injury to H&R Block.<sup>4</sup> As described in the declaration of Heather Watts, H&R Block’s Senior Vice President of Consumer Tax Products and Support, attached as Exhibit B, the documents contain secret, material information that H&R Block goes to great lengths to protect. A complete list of these documents is appended as Attachment 1 to the Watts Declaration.<sup>5</sup> For several of these documents, the confidentiality of such information, including pricing strategies, financial data, and product development, was previously at issue before the Court and the Court ultimately agreed with H&R Block that such information was competitively sensitive. *See* Order on: (1) Motion to Remove Redactions from Paragraphs 29 Through 32 of the Public Complaint, and (2) Unopposed Motion to Remove Certain Redactions from the Public Complaint, Docket No. 9427 (May 8, 2024). Here, H&R Block has established that not only is the confidential information at issue competitively sensitive, but also that publishing such information would cause serious injury. Because of the highly sensitive nature of the documents in each of these categories, H&R Block requests that they be kept confidential for five years; and certain documents warrant protection for ten years. *See In the Matter of Impax Labs., Inc.*, 2017 WL 4948988, at \*1 (F.T.C. Oct. 23, 2017) (ordering *in*

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<sup>4</sup> *In the Matter of Intuit, Inc.*, involving similar issues, is instructional here as there the Court recognized *in camera* treatment was appropriate for similar categories of documents. Order on Respondent’s Second Motion for *In Camera* Treatment, No. 9408 (Mar. 21, 2023).

<sup>5</sup> Multiple of Complaint Counsel’s exhibits are saved in file formats that H&R Block was unable to open or view. Accordingly, H&R Block reserves the right to seek *in camera* treatment for any appropriate information in such files.

*camera* treatment for ten years over “documents that include financial and sales projections for future years and pipeline products”).

**A. Categories of Documents and Testimony.**

**1. Trade Secrets and Product Development.**

In camera treatment is appropriate to protect trade secrets, secret formula, processes, and other secret technical information. *See, e.g. Altria Grp.*, 2021 WL 2258803, at \*2; *Gen. Foods Corp.*, 95 F.T.C. 352, 352 (1980). Documents and testimony reflecting H&R Block’s trade secrets or product development plans are non-public, confidential, and crucial to H&R Block’s business operations.

H&R Block’s trade secrets and product development documents detail potential new product offerings and features for H&R Block’s online DIY tax preparation products, but also include documents that explore product design options. H&R Block’s trade secrets include technical information and code regarding the design and functionality of H&R Block’s online products, such as PX731 and RX0079 which are source code.<sup>6</sup> H&R Block seeks in camera of its source code and the documents and testimony—whether already given or anticipated—that discuss, refer, or relate to how H&R Block’s software operates. The information about H&R Block’s software operation is highly competitive information and closely guarded within the company. The deposition testimony, reports, exhibits, and anticipated live testimony for expert witnesses Rick Watts and Ron Schnell, and deposition and anticipated live testimony of Jeremy Isaacson contain (and will contain) trade secret and product development information, such as discussion about source code and detailed technical information regarding the H&R Block online products that must be protected from public disclosure.

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<sup>6</sup> Complaint Counsel agrees that H&R Block’s source code should receive *in camera* treatment.

These trade secret and product development documents could give competitors insight into H&R Block's strategies, development, and implementation of certain features. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Public

disclosure of this highly sensitive information could damage H&R Block's business and competitive standing and thus should receive *in camera* treatment.

**2. Internal User Data and Financial Information.**

*In camera* treatment is warranted for documents that include internal user data and internal financial data or metrics. *See* Altria Grp., 2021 WL 2258803, at \*4-5 (protecting financial data that is fundamental to company's operations); *1-800 Contacts, Inc.*, 2017 FTC LEXIS 55, at \*9-10 (Apr. 4, 2017). Documents and testimony reflecting H&R Block's internal user data and internal financial information should be kept confidential. These documents include detailed, non-public user data and financial information, such as revenue goals, performance, and documents that relate to the financial impact of product changes. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Much of this information is less than three years old and deserves *in camera* treatment.

### 3. Sales and Marketing Strategy.

Documents and testimony concerning H&R Block's sales, marketing, and advertising strategies should be kept confidential. *See, e.g., Benco Dental Supply Co.*, 2018 WL 5292624, at \*4 (F.T.C. Oct. 11, 2018) (granting *in camera* treatment for documents concerning sales, non-public pricing, rebates, discounts and member feedback information); *see also Otto Bock*, 2018 WL 3491602, at \*3 (marketing plans and sales documents may receive *in camera* treatment). Such documents reveal H&R Block's confidential strategies for marketing its online products. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] These documents, too, should receive *in camera* treatment.

### 4. Pricing and Pricing Strategy.

Documents and testimony reflecting H&R Block's pricing and pricing strategy information should be kept confidential. *See, e.g., 1-800 Contacts*, 2017 F.T.C. LEXIS 55, at \*11-12

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<sup>7</sup> While PX161 is a document produced by third-party Vayner, one of H&R Block's marketing partners, the document is appropriate for *in camera* treatment under this Motion because it contains H&R Block's confidential marketing information and would cause H&R Block serious injury if disclosed. *See In the Matter of Otto Bock Healthcare N. Am., Inc.*, No. 9378, 2018 WL 3491602, at \*1 (F.T.C. July 2, 2018) (citing 16 C.F.R. § 3.45(b)).

(protecting documents containing information on “pricing, competitive position, marketing and bidding strategies, and internal analyses of customer demographics and buying patterns”). These documents reflect H&R Block’s pricing strategy for their differing online tax preparation products at issue and internal price-setting discussions. [REDACTED]

[REDACTED]

**5. Business Development Strategy.**

Documents and testimony reflecting H&R Block’s business development strategy and plans should be kept confidential. These documents include plans for product development, marketing, company growth, and strategic plans for competing in the tax industry. [REDACTED]

[REDACTED]

[REDACTED] These documents should receive *in camera* treatment, consistent with similar



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decisions from this Court. *See Benco Dental*, 2018 FTC LEXIS 156, at \*23 (*in camera* treatment for “strategic business plans”); *1-800 Contacts*, 2017 FTC LEXIS 55, at \*9 (*in camera* treatment of “evaluations of market factors, market risks, company advantages, company disadvantages, and company risks, and which also review future strategic plans, including financial metrics, customer and supplier data, and market growth indicators”); *see also McWane*, 2012 FTC LEXIS 143, at \*7-8 (August 17, 2012) (*in camera* treatment granted to business strategies and negotiating strategies).

#### **6. Taxpayer Personal Information.**

Certain documents should be kept confidential because they reflect consumer sensitive personal information. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Moreover, as detailed in the parties’ stipulation, Complaint Counsel agrees that certain information within this category deserves *in camera* treatment.

#### **B. *In Camera* Treatment is Warranted for The Categories of Documents Described in this Motion.**

All six *Bristol-Myers* factors support *in camera* treatment with respect to each category of documents described in this motion. The attached declaration describes in detail the confidential nature of the documents, the harm that H&R Block would suffer if the information were made public, and the steps H&R Block takes to keep the information confidential. *See, e.g., In the Matter of Tronox Ltd.*, 2018 WL 2336015, at \*1 (F.T.C. May 15, 2018).

*First*, the information at issue is particular to H&R Block's business, including product development, user and financial information, marketing and business strategy, and pricing strategy, and such information is not known outside H&R Block. Decl. ¶¶ 4, 9-12. "Recent sales and profit data generally suggest themselves as being both secret and material to the firm concerned." *Gen. Foods. Corp.*, 1980 WL 339035, at \*3 n.4. How H&R Block's system operates, for example, is secret and competitively sensitive information. Decl. ¶ 9.

*Second*, only select groups within H&R Block have access to the differing categories of information. For example, access to the code is limited to those who are responsible for writing or modifying it or those who are specifically authorized to do so. The material remains available only to employees whose job duties relate to the information at issue in each document. *Id.* ¶ 3. That amounts to a fraction of the thousands of H&R Block employees.

*Third*, H&R Block expends great effort to keep this information secret. H&R Block marked the material "confidential" under the protective order in this case, and protects the information in its course of business to keep it out of competitor's hands. *Id.* ¶¶ 4, 9-12. H&R Block has established and adhered to these internal policies and practices prohibiting disclosure of the information and has provided the material here with assurances that it would remain confidential under the Protective Order. *Id.* ¶ 4.

*Fourth*, public disclosure would harm H&R Block's ability to compete in the marketplace. *Id.* ¶¶ 9-13. Competitors with access to the information could seek to preempt and counteract H&R Block's key business strategies. *Id.* Revealing the material publicly would undermine H&R Block's competitive standing. Competitors who had access to H&R Block's source code and understand its architecture could replicate it. *Id.* ¶ 9. That is a serious injury, sufficient to justify keeping the information confidential. *See In re Dura Lube Corp.*, 1999 FTC Lexis 255 at \*7 (Dec.

23, 1999) (“The likely loss of business advantages is a good example of a ‘clearly defined, serious injury.’”)

*Fifth*, H&R Block has dedicated significant time, money, and energy in developing business strategies, pricing, innovation, and products. Decl. ¶¶ 9-13. H&R Block employees developed the data, information, and documents over years of heavy investment in time and money.

*Sixth*, other parties have no access to this information because it remains confidential and not in the public domain.

Granting *in camera* status to H&R Block’s information would align with this tribunal’s general approach to such requests. For example, the court has granted *in camera* status to pricing information, the “technical specifications and capabilities of [Respondent’s] manufacturing plants and products,” as well as “models underlying [Respondent’s] sales structure,” documents reflecting “compensation and benefits for specific individuals,” and Respondent’s “plans relating to future potential changes in its work force and compensation/benefits strategy for specific [H&R Block products].” *In the Matter of Tronox*, 2018 WL 2336015, at \*1-\*2 (May 15, 2018). Other information also fell within the ALJ’s *in camera* order: pricing information, business plans, views on efficacy of differing features for products, marketing practices, strategies, customer acquisition methods, analyses of participants in the relevant market, strategic plans, pricing communications, customer information, and more. *1-800 Contacts*, 2017 FTC LEXIS 55, at \*4-12. The same should apply here.

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Dated: October 3, 2024

Respectfully submitted,

By: /s Erika Whyte

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

**In the matter of**

**H&R BLOCK INC.**,  
a corporation,

**HRB DIGITAL LLC**,  
a limited liability company, and

**HRB TAX GROUP, INC.**,  
a corporation.

**DOCKET NO. 9427  
NON-PUBLIC VERSION**

**RESPONDENTS' MEET AND CONFER STATEMENT**

The March 22, 2024 Scheduling Order does not require a certificate of conference for motions for in camera treatment. *See* Scheduling Order at 6, Additional Provisions ¶ 4. Respondent submits this certification to apprise the Court that it has conferred with Complaint Counsel in a good faith effort to resolve by agreement the issues raised in this motion. Complaint Counsel has indicated that it will not oppose portions of this motion, pending their review of H&R Block's motion, supporting declaration, and redactions.

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 3, 2024, I caused the foregoing document electronically using the FTC's e-Filing system, which will send notification of such filing to:

April Tabor  
Office of the Secretary  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Suite CC-5610  
Washington, DC 20580  
ElectronicFilings@ftc.gov

The Honorable Jay L. Himes  
Administrative Law Judge  
600 Pennsylvania Ave., NW  
Suite H-110  
Washington, DC 20580

I further certify that on October 3, 2024, I caused the foregoing document to be served via email to:

Claire Wack  
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*Counsel Supporting the Complaint*

Dated: October 3, 2024

Respectfully submitted,

By: /s/ Erika Whyte  
Erika Whyte

# **EXHIBIT A**

PUBLIC

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

**In the matter of**

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**DOCKET NO. 9427  
NON-PUBLIC VERSION**

**[PROPOSED] ORDER GRANTING RESPONDENTS'  
MOTION FOR *IN CAMERA* TREATMENT**

Respondents H&R Block Inc., HRB Digital LLC, and HRB Tax Group, Inc. have filed a Motion for *In Camera* Treatment of Certain Documents and Testimony. Having considered the Motion, it is hereby ORDERED that the Motion is GRANTED.

It is hereby ORDERED that documents and testimony in the following categories are granted *in camera* treatment in this matter: (1) Trade Secrets and Product Development; (2) Internal User Data and Financial Information; (3) Pricing and Pricing Strategy; (5) Business Development Strategy; and (6) Taxpayer Personal Information.

It is further ORDERED that the documents and testimony comprising Taxpayer Personal Information will receive *in camera* treatment for an unlimited duration; documents and testimony comprising Trade Secrets and Product Development Information will receive *in camera* treatment for ten years; and documents and testimony comprising all other categories will receive *in camera* treatment for five years.



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SO ORDERED.

Date:

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The Honorable Jay L. Himes  
Administrative Law Judge

# **EXHIBIT B**

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

**In the matter of**

**H&R BLOCK INC.,**  
a corporation,

**HRB DIGITAL LLC,**  
a limited liability company, and

**HRB TAX GROUP, INC.,**  
a corporation.

**DOCKET NO. 9427  
NON-PUBLIC VERSION**

**DECLARATION OF HEATHER WATTS**

1. My name is Heather Watts. I am the Senior Vice President of Consumer Tax Products and Support at H&R Block.
2. I am responsible for all product and business strategy for the company's DIY tax business, and oversee the development, design, marketing, and end-to-end client experience of all H&R Block online, software, and mobile tax products and solutions.
3. I am familiar with H&R Block's policies and procedures regarding the protection of confidential information, and I have personal knowledge of how the public disclosure of various types of confidential information would harm H&R Block.
4. In the ordinary course of business, H&R Block keeps much of its information strictly confidential and limits its distribution within the company to employees who must or should know it in connection with their job duties. When H&R Block produced confidential material to the FTC, it relied on the confidentiality rules and protective order which shielded confidential information from public disclosure.

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5. I understand that Complaint Counsel's exhibit list included over 800 documents, 283 of which H&R Block seeks confidential treatment in whole or in part. H&R Block's exhibit list included 446 documents, 202 documents for which it seeks confidential treatment in whole or in part. A complete list of the documents for which H&R Block seeks confidential treatment is attached as Attachment 1 to this Declaration.

6. Due to the volume, no one person could reasonably review and categorize each document. Counsel for H&R Block has described to me the categories of confidential information contained in these documents, I have reviewed certain documents, and I have received information from individuals on whom I regularly rely.

7. Based on my understanding of the document categories, my review of certain documents, information brought to my attention by individuals upon whom I regularly rely, and my familiarity with H&R Block's highly competitive business and the confidential nature of such business, it is clear that public disclosure and dissemination of the exhibits or portions identified in this declaration or its Attachment would result in substantive competitive and financial injury to H&R Block. Such disclosure would allow H&R Block's competitors to gain insight into, among other things, H&R Block's business strategies, metrics H&R Block qualifies as successful or needing improvement in revenue, product development, or marketing strategy, and technical information specific to H&R Block's products. H&R Block's competitors in the highly competitive tax industry could utilize such information to undercut or replicate H&R Block's technical or developing products and market directly against H&R Block based on its technical information or marketing strategies.

8. For each category of documents, I explain why H&R Block will be harmed if the confidential information is made public.

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9. Trade Secrets and Product Development. H&R Block's trade secrets and product development plans detail potential new product offerings and features for H&R Block's online DIY tax preparation products that could give competitors insight into H&R Block's strategies, development, and implementation of certain features. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] H&R Block's trade secrets

include technical information and code regarding the design and functionality of H&R Block's online DIY products. For example, PX731 is the source code for H&R Block's online DIY products. The deposition testimony, reports, exhibits, and anticipated live testimony for expert witnesses Rick Watts and Ron Schnell, and deposition and anticipated live testimony of Jeremy Isaacson further contain (and will contain) trade secret and product development information, such as discussion about source code and detailed technical information regarding the H&R Block online DIY products. It has taken H&R Block years of significant effort to develop its online DIY software system. H&R Block has expended significant time and resources in developing these technical strategies, products, and trade secrets. This information is nonpublic and H&R Block protects such information. Such information is only disseminated to individuals who need the information with respect to their duties for the company. Only those individuals whose responsibilities relate to the code have access to it and information related to the code. If such information were to be publicly disseminated, H&R Block's competitors could either replicate or create other product developments in an effort to undercut H&R Block's advantage through its

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products. With respect to H&R Block's code, in particular, if that code was obtained and the architecture understood, it could be replicated, causing significant harm to H&R Block.

10. Internal User Data and Financial Information. H&R Block also produced documents reflecting internal user data and financial information, including the number of users using differing products and revenue information. The public release of these materials would harm H&R Block because they reveal its current and prospective financial condition, which is important to its ability to compete in the market. H&R Block's competitors could use this information to plan their own competitive business strategy based on H&R Block's number of users and financial state, particularly as this information is broken down by products. H&R Block's competitors could alter their strategies in an effort to take business from H&R Block's online DIY products. I believe this information should remain confidential. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] This information is nonpublic and H&R Block protects such information within the company, as such information is only disseminated to individuals who need the information with respect to their duties for the company.

11. Sales and Marketing Strategy. Several of the documents identified in Attachment 1 reveal H&R Block's confidential strategies for marketing its online DIY products, which H&R Block has expended significant time and resources to develop and implement. [REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] If publicly disclosed, the information contained in these documents would allow H&R Block's competitors to understand H&R Block's goals and metrics when advertising certain products to certain groups of consumers and potentially leverage or attack such information in the competitors' own marketing campaigns. This is particularly so considering H&R Block analyzes and compares its own advertisements to competitors' ads. H&R Block's competitors would further have access to consumer response and feedback to H&R Block's ads, which could further help H&R Block's competitors undermine its success and ad resonance with consumers. This information is nonpublic and H&R Block protects such information within the company, as such information is only disseminated to individuals who need the information with respect to their duties for the company. I believe this information should remain confidential.

12. Pricing and Pricing Strategy Information. If confidential pricing information is disclosed, H&R Block's competitors could use it to unfairly utilize H&R Block's pricing methods and mechanisms and take business from H&R Block. I believe this information should remain confidential because it can be used to infer relevant information about H&R Block's current (and future) prices and commercial relationships. [REDACTED]

[REDACTED] Permitting H&R Block's competitors to access H&R Block's

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pricing analyses, structure, and strategies would give the competitors an unfair advantage in directly competing with H&R Block in an effort to obtain a portion of H&R Block's market share, as the competitors could alter their own pricing strategies specifically in response to H&R Block's internal analyses. Moreover, it would give H&R Block's competitors insight into the process of how H&R Block decides on its pricing models, which H&R Block has spent significant time and resources developing.

13. Business Development Strategy Information. H&R Block produced documents reflecting its strategic plans and other forward-looking business plans. The public release of these materials would harm H&R Block because they reveal its current and future plans to improve its business and compete in the market. H&R Block's competitors could use them to plan their own competitive activities or unfairly undermine H&R Block's plans for growth. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] I believe this information should remain confidential.



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14. Taxpayer Personal Information. H&R Block produced some documents reflecting sensitive personal information. I believe this information should remain confidential. [REDACTED]

15. 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 seriously harm H&R Block. Similarly, these categories cannot capture every possible type of sensitive information that should not be released to the public. I understand that H&R Block'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.

16. 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.

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

Dated: October 3, 2024

s/ Heather Watts

Heather Watts

# **ATTACHMENT 1**

PUBLIC

| Exhibit Number | Exhibit Description | Date                     | Bates No. | In Camera Treatment  | Partial or Complete In Camera Treatment | Duration of In Camera Treatment |
|----------------|---------------------|--------------------------|-----------|--|---|---------------------------------|
| PX004          |                     | 1/30/2014                | CC-000017 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX005          |                     | 2/3/2014                 | CC-000022 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX006          |                     | 1/31/2014-<br>2/4/2014   | CC-000024 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX007          |                     | 3/25/2014-<br>4/3/2014   | CC-000025 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX008          |                     | 6/11/2014-<br>6/26/2014  | CC-000027 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX009          |                     | 6/25/2014                | CC-000030 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX010          |                     | 8/14/2014 -<br>8/22/2014 | CC-000031 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX011          |                     | 8/22/2014                | CC-000033 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX012          |                     | 9/4/2014                 | CC-000034 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX013          |                     | 2/5/2014                 | CC-000035 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX014          |                     | 2/10/2015-<br>2/11/2015  | CC-000037 | Business Development Strategy;<br>Sales and Marketing Strategy | Complete                                | 5 Years                         |
| PX015          |                     | 3/6/2015                 | CC-000039 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX016          |                     | 2/26/2015                | CC-000040 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX017          |                     | 11/24/2015               | CC-000043 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX018          |                     | 5/18/2015                | CC-000044 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX019          |                     | 2/12/2015                | CC-000045 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX020          |                     | 2/12/2015                | CC-000046 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX021          |                     | 9/1/2015                 | CC-000047 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX022          |                     | 9/1/2015                 | CC-000048 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX023          |                     | 1/12/2017-<br>1/20/2017  | CC-000051 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX024          |                     | 1/20/2017                | CC-000052 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX025          |                     | 5/1/2017                 | CC-000053 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX026          |                     | 5/1/2017                 | CC-000054 | Business Development Strategy                                  | Complete                                | 5 Years                         |
| PX027          |                     | 1/25/2018-<br>1/26/2018  | CC-000055 | Business Development Strategy                                  | Complete                                | 5 Years                         |

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|       |  |                          |           |   |          |         |
|-------|--|--------------------------|-----------|---|----------|---------|
| PX028 |  | 5/14/2018                | CC-000058 | Business Development Strategy   | Complete | 5 Years |
| PX029 |  | 4/11/2018-<br>6/20/20218 | CC-000059 | Business Development Strategy   | Complete | 5 Years |
| PX031 |  | 8/15/2018                | CC-000070 | Business Development Strategy   | Complete | 5 Years |
| PX035 |  | 6/4/2019                 | CC-000079 | Business Development Strategy   | Complete | 5 Years |
| PX036 |  | 4/30/2019                | CC-000080 | Pricing/Pricing Strategy;<br>Business Development Strategy  | Complete | 5 Years |
| PX038 |  | 4/30/2019                | CC-000084 | Internal User Data and Financial<br>Information   | Complete | 5 Years |
| PX042 |  | Unknown                  | CC-000089 | Internal User Data and Financial<br>Information; Business<br>Development Strategy   | Complete | 5 Years |
| PX043 |  | 7/27/2024                | CC-000090 | Business Development Strategy   | Complete | 5 Years |
| PX044 |  | 1/2/2014-1/6/2014        | CC-000095 | Business Development Strategy   | Complete | 5 Years |
| PX045 |  | 1/21/2018                | CC-000100 | Internal User Data and Financial<br>Information; Sales and<br>Marketing Strategy; Business<br>Development Strateg                               | Complete | 5 Years |
| PX046 |  | 1/21/2018                | CC-000103 | Business Development Strategy;<br>Sales and Marketing Strategy  | Complete | 5 Years |
| PX047 |  | 1/26/2016-<br>1/27/2016  | CC-000104 | Business Development Strategy;<br>Sales and Marketing Strategy  | Complete | 5 Years |
| PX048 |  | 2/29/2018                | CC-000106 | Business Development Strategy;<br>Sales and Marketing Strategy  | Complete | 5 Years |
| PX049 |  | 2/8/2018                 | CC-000108 | Internal User Data and Financial<br>Information; Pricing/Pricing<br>Strategy; Business Development<br>Strategy; Sales and Marketing<br>Strategy | Complete | 5 Years |
| PX050 |  | 1/21/2018-<br>1/24/2018  | CC-000164 | Business Development Strategy;<br>Sales and Marketing Strategy  | Complete | 5 Years |
| PX051 |  | 1/21/2018                | CC-000168 | Business Development Strategy;<br>Sales and Marketing Strategy  | Complete | 5 Years |
| PX052 |  | 11/16/2017               | CC-000169 | Business Development Strategy   | Complete | 5 Years |
| PX053 |  | 11/14/2017               | CC-000170 | Business Development Strategy   | Complete | 5 Years |
| PX054 |  | 6/8/2018                 | CC-000171 | Business Development Strategy   | Complete | 5 Years |

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|-------|--|---------------------|-----------|---|----------|---------|
| PX055 |  | 5/10/2024           | CC-000172 | Internal User Data and Financial Information; Sales and Marketing Strategy; Business Development Strategy                           | Complete | 5 Years |
| PX056 |  | 6/3/2018            | CC-000184 | Business Development Strategy   | Complete | 5 Years |
| PX057 |  | 6/3/2015            | CC-000185 | Business Development Strategy; Sales and Marketing Strategy   | Complete | 5 Years |
| PX058 |  | 1/6/2017            | CC-000186 | Sales and Marketing Strategy; Business Development Strategy;  | Complete | 5 Years |
| PX059 |  | 1/2/2014-1/3/2014   | CC-000188 | Business Development Strategy   | Complete | 5 Years |
| PX060 |  | 6/23/2015-6/24/2015 | CC-000190 | Business Development Strategy   | Complete | 5 Years |
| PX061 |  | 6/25/2015           | CC-000192 | Internal User Data and Financial Information; Pricing/Pricing Strategy; Business Development Strategy; Sales and Marketing Strategy | Complete | 5 Years |
| PX062 |  | 3/20/2018           | CC-000193 | Internal User Data and Financial Information; pricing/Pricing Strategy; Business Development Strategy; Sales and Marketing Strategy | Complete | 5 Years |
| PX063 |  | 7/29/2015           | CC-000196 | Business Development Strategy   | Complete | 5 Years |
| PX064 |  | 7/27/2105           | CC-000197 | Internal User Data and Financial Information; pricing/Pricing Strategy; Business Development Strategy; Sales and Marketing Strategy | Complete | 5 Years |
| PX065 |  | 8/26/2015           | CC-000200 | Business Development Strategy   | Complete | 5 Years |
| PX066 |  | 9/10/2015           | CC-000201 | Internal User Data and Financial Information; Pricing/Pricing Strategy; Business Development Strategy; Sales and Marketing Strategy | Complete | 5 Years |
| PX067 |  | 2/10/2015-2/11/2015 | CC-000202 | Business Development Strategy   | Complete | 5 Years |
| PX068 |  | 6/7/2017            | CC-000205 | Business Development Strategy   | Complete | 5 Years |
| PX069 |  | 6/6/2017            | CC-000206 | Business Development Strategy   | Complete | 5 Years |
| PX070 |  | 11/22/2019          | CC-000229 | Business Development Strategy   | Complete | 5 Years |

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|-------|--|---------------------|-----------|---|----------|---------|
| PX071 |  | 6/29/2029           | CC-000230 | Business Development Strategy; pricing/Pricing Strategy   | Complete | 5 Years |
| PX072 |  | 5/9/2018            | CC-000384 | Business Development Strategy   | Complete | 5 Years |
| PX073 |  | 3/25/2020           | CC-000395 | Business Development Strategy   | Complete | 5 Years |
| PX074 |  | 3/25/2020           | CC-000396 | Business Development Strategy; pricing/Pricing Strategy; Internal User Data and Financial Information;    | Complete | 5 Years |
| PX075 |  | 4/13/2021-4/21/2021 | CC-000454 | Business Development Strategy   | Complete | 5 Years |
| PX076 |  | 4/21/2021           | CC-000459 | Business Development Strategy; Internal User Data and Financial Information                               | Complete | 5 Years |
| PX077 |  | 6/21/2024           | CC-000495 | Internal User Data and Financial Information; Business Development Strategy; Sales and Marketing Strategy | Complete | 5 Years |
| PX078 |  | 2/7/21-2/14/21      | CC-000510 | Business Development Strategy   | Complete | 5 Years |
| PX079 |  | 3/4/2020-3/5/2020   | CC-000535 | Pricing/Pricing Strategy; Business Development Strategy; Sales and Marketing Strategy                     | Complete | 5 Years |
| PX082 |  | 1/14/2019-2/12/2019 | CC-000548 | Business Development Strategy   | Complete | 5 Years |
| PX083 |  | 2/6/2019-2/10/2019  | CC-000551 | Business Development Strategy   | Complete | 5 Years |
| PX084 |  | 10/3/2018           | CC-000562 | Business Development Strategy   | Complete | 5 Years |
| PX085 |  | 6/6/2018            | CC-000563 | Business Development Strategy; pricing/Pricing Strategy   | Complete | 5 Years |
| PX086 |  | 4/10/2020-4/15/2020 | CC-000727 | Business Development Strategy   | Complete | 5 Years |
| PX087 |  | 05/2020             | CC-000728 | Business Development Strategy; Pricing Strategy; Internal User Data and Financial Information             | Complete | 5 Years |
| PX088 |  | 03/31/2020          | CC-000729 | Business Development Strategy; Pricing Strategy; Internal User Data and Financial Information             | Complete | 5 Years |
| PX090 |  | 10/21/2020          | CC-000732 | Business Development Strategy   | Complete | 5 Years |
| PX091 |  | 11/05/2020          | CC-000733 | Business Development Strategy; Pricing Strategy; Internal User Data and Financial Information             | Complete | 5 Years |

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|-------|--|------------|-----------|---|----------|----------|
| PX092 |  | 10/06/2021 | CC-000802 | Internal User Data and Financial Information  | Complete | 5 Years  |
| PX093 |  | 10/06/2021 | CC-000803 | Business Development Strategy; Pricing Strategy; Internal User Data and Financial Information             | Complete | 5 Years  |
| PX094 |  | 10/06/2021 | CC-000879 | Business Development Strategy; Pricing Strategy; Internal User Data and Financial Information             | Complete | 5 Years  |
| PX095 |  | 09/15/2021 | CC-000939 | Business Development Strategy; Pricing Strategy; Internal User Data and Financial Information             | Complete | 5 Years  |
| PX096 |  | 09/17/2021 | CC-000941 | Business Development Strategy; pricing/Pricing Strategy; Internal User Data and Financial Information;    | Complete | 5 Years  |
| PX097 |  | 05/28/2021 | CC-000943 | Business Development Strategy; Pricing Strategy; Internal User Data and Financial Information             | Complete | 5 Years  |
| PX098 |  | 03/13/2019 | CC-000953 | Business Development Strategy; Trade Secret   | Complete | 10 Years |
| PX100 |  | 3/1/2024   | CC-000965 | Business Development Strategy; Internal User Data and Financial Information; Sales and Marketing Strategy | Complete | 5 Years  |
| PX101 |  | 10/12/20   | CC-000989 | Business Development Strategy; Internal User Data and Financial Information; Sales and Marketing Strategy | Complete | 5 Years  |
| PX102 |  | 3/17/23    | CC-001023 | Business Development Strategy   | Complete | 5 Years  |
| PX103 |  | 8/5/22     | CC-001025 | Business Development Strategy   | Complete | 5 Years  |
| PX104 |  | 9/17/21    | CC-001027 | Business Development Strategy   | Complete | 5 Years  |
| PX105 |  | 7/30/21    | CC-001029 | Business Development Strategy   | Complete | 5 Years  |
| PX106 |  | 3/3/23     | CC-001030 | Business Development Strategy; Internal User Data and Financial Information                               | Complete | 5 Years  |
| PX107 |  | 2/15/24    | CC-001033 | Business Development Strategy; Internal User Data and Financial Information                               | Complete | 5 Years  |

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|-------|--|-------------|-----------|---|----------|----------|
| PX108 |  | 2/15/24     | CC-001039 | Business Development Strategy; Internal User Data and Financial Information   | Complete | 5 Years  |
| PX109 |  | 9/18/23     | CC-001044 | Business Development Strategy; pricing/Pricing Strategy   | Complete | 5 Years  |
| PX110 |  | 7/11/24     | CC-001048 | Trade Secret and Product Development; Pricing and Pricing Strategy; Business Development Strategy   | Complete | 10 Years |
| PX111 |  | 6/8/23      | CC-001062 | Business Development Strategy   | Complete | 5 Years  |
| PX112 |  | 9/19/23     | CC-001074 | Business Development Strategy   | Complete | 5 Years  |
| PX113 |  | 3/9/23      | CC-001077 | Business Development Strategy   | Complete | 5 Years  |
| PX114 |  | 3/15/23     | CC-001083 | Business Development Strategy; Internal User Data and Financial Information   | Complete | 5 Years  |
| PX115 |  | 4/14/20     | CC-001086 | Business Development Strategy   | Complete | 5 Years  |
| PX116 |  | 1/27/21     | CC-001088 | Business Development Strategy   | Complete | 5 Years  |
| PX118 |  | Unknown     | CC-001101 | Business Development Strategy   | Complete | 5 Years  |
| PX119 |  | 1/6/17      | CC-001103 | Business Development Strategy   | Complete | 5 Years  |
| PX120 |  | 1/6/17      | CC-001104 | Business Development Strategy; Sales and Marketing Strategy   | Complete | 5 Years  |
| PX121 |  | 3/21/17     | CC-001106 | Business Development Strategy   | Complete | 5 Years  |
| PX122 |  | 7/11/24     | CC-001111 | Trade Secret and Product Development; Pricing Strategy; Business Development Strategy   | Complete | 10 Years |
| PX124 |  | August 2017 | CC-001126 | Sales and Marketing Strategy  | Complete | 5 Years  |
| PX125 |  | 10/1/20     | CC-001149 | Sales and Marketing Strategy; Internal User Data and Financial Information; pricing/Pricing Strategy; business development strategy; trade secret | Complete | 10 Years |
| PX127 |  | 1/29/2022   | CC-001238 | Sales and Marketing Strategy  | Complete | 5 Years  |



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|-------|--|----------|-----------|---|----------|----------|
| PX132 |  | 12/5/17  | CC-001262 | Business Development Strategy;<br>Sales and Marketing Strategy  | Complete | 5 Years  |
| PX138 |  | 3/1/2022 | CC-001276 | Internal User Data and Financial<br>Information; Business<br>Development Strategy   | Complete | 5 Years  |
| PX140 |  | 1/14/17  | CC-001293 | Sales and Marketing Strategy  | Complete | 5 Years  |
| PX141 |  | 3/28/18  | CC-001316 | Sales and Marketing Strategy;<br>Internal User Data and Financial<br>Information; pricing/Pricing<br>Strategy; business development<br>strategy; trade secret | Complete | 10 Years |
| PX142 |  | 9/29/18  | CC-001377 | Sales and Marketing Strategy;<br>Internal User Data and Financial<br>Information; business<br>development strategy  | Complete | 5 Years  |
| PX143 |  | 3/22/18  | CC-001425 | Sales and Marketing Strategy;<br>Internal User Data and Financial<br>Information; business<br>development strategy  | Complete | 5 Years  |
| PX144 |  | 4/5/18   | CC-001470 | Sales and Marketing Strategy;<br>Internal User Data and Financial<br>Information; business<br>development strategy  | Complete | 5 Years  |
| PX145 |  | 5/9/18   | CC-001516 | Sales and Marketing Strategy  | Complete | 5 Years  |
| PX146 |  | 6/5-6/18 | CC-001517 | Internal User Data and Financial<br>Information; business<br>development strategy; Pricing<br>Strategy  | Complete | 5 Years  |
| PX147 |  | Unnown   | CC-001544 | Business Development Strategy   | Complete | 5 Years  |
| PX148 |  | May 2017 | CC-001545 | Sales and Marketing Strategy;<br>Business Development Strategy  | Complete | 5 Years  |
| PX149 |  | 5/9/19   | CC-001546 | Sales and Marketing Strategy;<br>Business Development Strategy  | Complete | 5 Years  |
| PX150 |  | May 2019 | CC-001598 | Sales and Marketing Strategy  | Complete | 5 Years  |
| PX151 |  | 8/9/24   | CC-001686 | Internal User Data and Financial<br>Information; Business<br>Development Strategy   | Complete | 5 Years  |
| PX152 |  | 5/1/20   | CC-001702 | Business Development Strategy   | Complete | 5 Years  |
| PX153 |  | 4/30/20  | CC-001703 | Business Development Strategy   | Complete | 5 Years  |
| PX154 |  | For TS21 | CC-001708 | Business Development Strategy   | Complete | 5 Years  |

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|-------|--|----------------|-----------|---|----------|------------|
| PX156 |  | 2/2/24         | CC-001713 | Business Development Strategy   | Complete | 5 Years    |
| PX157 |  | 2/2/24         | CC-001714 | Business Development Strategy   | Complete | 5 Years    |
| PX158 |  | March 2024     | CC-001715 | Sales and Marketing Strategy  | Complete | 5 Years    |
| PX159 |  | 4/3/24         | CC-001723 | Sales and Marketing Strategy  | Complete | 5 Years    |
| PX160 |  | March 2024 (?) | CC-001753 | Sales and Marketing Strategy  | Complete | 5 Years    |
| PX161 |  | Unkown         | CC-001754 | Sales and Marketing Strategy  | Complete | 5 Years    |
| PX162 |  | 3/17/23        | CC-001755 | Business Development Strategy   | Complete | 5 Years    |
| PX165 |  | Unknown        | CC-001798 | Business Development Strategy   | Complete | 5 Years    |
| PX166 |  | 2/2/23         | CC-001799 | Business Development Strategy   | Complete | 5 Years    |
| PX167 |  | 1/26/23        | CC-001800 | Business Development Strategy   | Complete | 5 Years    |
| PX168 |  | 2/16/23        | CC-001801 | Business Development Strategy   | Complete | 5 Years    |
| PX169 |  | 3/11/23        | CC-001802 | Business Development Strategy   | Complete | 5 Years    |
| PX170 |  | 9/19/23        | CC-001853 | Business Development Strategy   | Complete | 5 Years    |
| PX171 |  | Unknown        | CC-001857 | Business Development Strategy   | Complete | 5 Years    |
| PX172 |  | 9/19/23        | CC-001861 | Business Development Strategy   | Complete | 5 Years    |
| PX173 |  | 2/15/24        | CC-001865 | Business Development Strategy   | Complete | 5 Years    |
| PX174 |  | 02/29/24       | CC-001866 | Business Development Strategy;<br>Taxpayer Personal Information   | Complete | Indefinite |
| PX175 |  | 03/15/2023     | CC-001870 | Internal User Data and Financial<br>Information; Sales and<br>Marketing Strategy;<br>Pricing/Pricing Strategy;<br>Business Development Strategy;<br>Internal User Data and Financial<br>Information | Complete | 5 Years    |

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|-------|--|------------|-----------|---|----------|------------|
| PX176 |  | 06/27/2018 | CC-001873 | Internal User Data and Financial Information; Sales and Marketing Strategy; Pricing/Pricing Strategy; Business Development Strategy | Complete | 5 Years    |
| PX177 |  | 01/07/2023 | CC-001874 | Internal User Data and Financial Information; Sales and Marketing Strategy; Business Development Strategy                           | Complete | 5 Years    |
| PX178 |  | 02/24/2024 | CC-001875 | Internal User Data and Financial Information; Sales and Marketing Strategy; Business Development Strategy                           | Complete | 5 Years    |
| PX179 |  | 02/29/2024 | CC-001876 | Internal User Data and Financial Information; Sales and Marketing Strategy; Business Development Strategy                           | Complete | 5 Years    |
| PX180 |  | 02/29/2024 | CC-001877 | Internal User Data and Financial Information; Sales and Marketing Strategy; Business Development Strategy                           | Complete | 5 Years    |
| PX189 |  | 02/17/2021 | CC-001893 | Internal User Data and Financial Information; Sales and Marketing Strategy; Business Development Strategy                           | Complete | 5 Years    |
| PX193 |  | 05/2020    | CC-001904 | Internal User Data and Financial Information; Sales and Marketing Strategy; Business Development Strategy                           | Complete | 5 Years    |
| PX194 |  | 07/06/2020 | CC-001905 | Sales and Marketing Strategy; Price/Pricing Strategy; Business Development Strategy   | Complete | 5 Years    |
| PX196 |  | 09/15/2021 | CC-001910 | Sales and Marketing Strategy; Price/Pricing Strategy; Business Development Strategy   | Complete | 5 Years    |
| PX197 |  | 05/30/2024 | CC-001933 | Trade Secret and Product Development; Internal User Data and Financial Information; Pricing Strategy; Business Development Strategy | Complete | 10 Years   |
| PX199 |  | 5/27/2021  | CC-002054 | Sales and Marketing Strategy; Pricing Strategy; Business Development Strategy   | Complete | 5 Years    |
| PX200 |  | 04/19/2021 | CC-002055 | Sales and Marketing Strategy; Pricing Strategy; Business Development Strategy; Taxpayer Personal Information                        | Complete | Indefinite |

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|-------|--|------------|-----------|---|----------|----------|
| PX201 |  | 01/30/2014 | CC-002056 | Sales and Marketing Strategy;<br>Business Development Strategy  | Complete | 5 Years  |
| PX202 |  | 02/05/2018 | CC-002061 | Business Development Strategy   | Complete | 5 Years  |
| PX203 |  | 03/16/2018 | CC-002064 | Sales and Marketing Strategy;<br>Business Development Strategy  | Complete | 5 Years  |
| PX204 |  | 01/11/2020 | CC-002067 | Trade Secret and Product<br>Development; Business<br>Development Strategy   | Complete | 10 Years |
| PX205 |  |            | CC-002074 | Trade Secret and Product<br>Development; Pricing Strategy;<br>Business Development Strategy   | Partial  | 10 Years |
| PX206 |  |            | CC-002143 | Sales and Marketing Strategy;<br>Business Development Strategy  | Partial  | 5 Years  |
| PX207 |  |            | CC-002248 | Trade Secret and Product<br>Development   | Complete | 10 Years |
| PX208 |  |            | CC-002365 | Sales and Marketing Strategy  | Partial  | 5 Years  |
| PX209 |  |            | CC-002591 | Trade Secret and Product<br>Development; Pricing Strategy;<br>Business Development Strategy   | Partial  | 10 Years |
| PX210 |  |            | CC-002675 | Trade Secret and Product<br>Development; Pricing Strategy;<br>Business Development Strategy   | Partial  | 10 Years |
| PX211 |  |            | CC-002765 | Trade Secret and Product<br>Development; Sales and<br>Marketing Strategy; Pricing and<br>Pricing Strategy; Business<br>Development Strategy | Partial  | 10 Years |
| PX335 |  | Unknown    | CC-003339 | Business Development Strategy   | Complete | 5 Years  |
| PX495 |  | 7/29/22    | CC-003518 | Sales and Marketing Strategy;<br>Business Development Strategy  | Complete | 5 Years  |
| PX499 |  | 05/24/2019 | CC-003523 | Sales and Marketing Strategy;<br>Business Development Strategy  | Complete | 5 Years  |
| PX500 |  | 02/28/2019 | CC-003540 | Sales and Marketing Strategy;<br>Business Development Strategy  | Complete | 5 Years  |
| PX501 |  | 01/22/2019 | CC-003541 | Sales and Marketing Strategy;<br>Business Development Strategy  | Complete | 5 Years  |

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|-------|--|------------|-----------|--|----------|---------|
| PX502 |  | 04/05/2018 | CC-003542 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX503 |  | 03/29/2018 | CC-003543 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX504 |  | 03/15/2018 | CC-003544 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX505 |  | 03/01/2018 | CC-003545 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX506 |  | 03/22/2018 | CC-003546 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX507 |  | 02/26/2018 | CC-003547 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX508 |  | 02/22/2018 | CC-003548 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX510 |  | 02/13/2018 | CC-003550 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX511 |  | 02/08/2018 | CC-003551 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX512 |  | 02/06/2018 | CC-003552 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX513 |  | 02/01/2018 | CC-003553 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX514 |  | 01/30/2019 | CC-003554 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX515 |  | 2/1/2024   | CC-003562 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX516 |  | 02/26/2019 | CC-003577 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX518 |  | 02/19/2019 | CC-003619 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| PX519 |  | 02/14/2019 | CC-003631 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |

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|-------|--|------------|-----------|---|----------|------------|
| PX520 |  | 08/08/2018 | CC-003640 | Sales and Marketing Strategy;<br>Business Development Strategy  | Complete | 5 Years    |
| PX521 |  | 02/05/2021 | CC-003641 | Sales and Marketing Strategy;<br>Business Development Strategy;<br>Taxpayer Personal Information  | Complete | Indefinite |
| PX522 |  | 04/16/2021 | CC-003642 | Sales and Marketing Strategy;<br>Business Development Strategy  | Complete | 5 Years    |
| PX523 |  | Undated    | CC-003644 | Taxpayer Personal Information   | Complete | Indefinite |
| PX524 |  | 7/31/2024  | CC-003714 | Internal User Data and Financial<br>Information; Business<br>Development Strategy   | Complete | 5 Years    |
| PX525 |  | 8/2/2024   | CC-003727 | Internal User Data and Financial<br>Information; Business<br>Development Strategy   | Complete | 5 Years    |
| PX526 |  | 8/8/2024   | CC-003728 | Internal User Data and Financial<br>Information; Sales and<br>Marketing Strategy; Pricing and<br>Pricing Strategy; Business<br>Development Strategy | Complete | 5 Years    |
| PX546 |  | 12/4/2014  | CC-003763 | Sales and Marketing Strategy;<br>Business Development Strategy  | Complete | 5 Years    |
| PX664 |  | 08/16/2024 | CC-003934 | Trade Secret and Product<br>Development; Pricing and<br>Pricing Strategy  | Complete | 10 Years   |
| PX665 |  | 08/16/2024 | CC-004003 | Trade Secret and Product<br>Development; Pricing and<br>Pricing Strategy  | Complete | 10 Years   |
| PX666 |  | 08/16/2024 | CC-004004 | Trade Secret and Product<br>Development; Pricing and<br>Pricing Strategy  | Complete | 10 Years   |
| PX667 |  | 08/16/2024 | CC-004005 | Trade Secret and Product<br>Development; Pricing and<br>Pricing Strategy  | Complete | 10 Years   |
| PX668 |  | 08/16/2024 | CC-004006 | Trade Secret and Product<br>Development; Pricing and<br>Pricing Strategy  | Complete | 10 Years   |
| PX669 |  | 08/16/2024 | CC-004007 | Trade Secret and Product<br>Development; Pricing and<br>Pricing Strategy  | Complete | 10 Years   |
| PX670 |  | 08/16/2024 | CC-004008 | Trade Secret and Product<br>Development; Pricing and<br>Pricing Strategy  | Complete | 10 Years   |

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| PX671 |  | 08/16/2024 | CC-004009 | Trade Secret and Product Development; Pricing and Pricing Strategy; Business Development Strategy | Complete | 10 Years |
| PX672 |  | 08/16/2024 | CC-004010 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX673 |  | 08/16/2024 | CC-004011 | Trade Secret and Product Development; Pricing and Pricing Strategy; Business Development Strategy | Complete | 10 Years |
| PX674 |  | 08/16/2024 | CC-004012 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX675 |  | 08/16/2024 | CC-004013 | Trade Secret and Product Development; Pricing and Pricing Strategy; Business Development Strategy | Complete | 10 Years |
| PX676 |  | 08/16/2024 | CC-004014 | Trade Secret and Product Development; Pricing and Pricing Strategy; Business Development Strategy | Complete | 10 Years |
| PX677 |  | 08/16/2024 | CC-004015 | Trade Secret and Product Development; Pricing and Pricing Strategy; Business Development Strategy | Complete | 10 Years |
| PX678 |  | 08/16/2024 | CC-004016 | Trade Secret and Product Development; Pricing and Pricing Strategy; Business Development Strategy | Complete | 10 Years |
| PX679 |  | 08/16/2024 | CC-004017 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX680 |  | 08/16/2024 | CC-004018 | Trade Secret and Product Development; Pricing and Pricing Strategy; Business Development Strategy | Complete | 10 Years |
| PX681 |  | 08/16/2024 | CC-004019 | Trade Secret and Product Development; Pricing and Pricing Strategy; Business Development Strategy | Complete | 10 Years |
| PX682 |  | 08/16/2024 | CC-004020 | Trade Secret and Product Development; Pricing and Pricing Strategy; Business Development Strategy | Complete | 10 Years |
| PX683 |  | 08/16/2024 | CC-004021 | Trade Secret and Product Development; Pricing and Pricing Strategy; Business Development Strategy | Complete | 10 Years |

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| PX684 |  | 08/16/2024 | CC-004022 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX685 |  | 08/16/2024 | CC-004023 | Trade Secret and Product Development; Pricing and Pricing Strategy; Business Development Strategy | Complete | 10 Years |
| PX686 |  | 08/16/2024 | CC-004024 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX687 |  | 08/16/2024 | CC-004025 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX688 |  | 08/16/2024 | CC-004026 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX689 |  | 08/16/2024 | CC-004027 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX690 |  | 08/16/2024 | CC-004028 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX691 |  | 08/16/2024 | CC-004029 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX692 |  | 08/16/2024 | CC-004030 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX693 |  | 08/16/2024 | CC-004031 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX694 |  | 08/16/2024 | CC-004032 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX695 |  | 08/16/2024 | CC-004033 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX696 |  | 08/16/2024 | CC-004034 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX697 |  | 08/16/2024 | CC-004035 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX698 |  | 08/16/2024 | CC-004036 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX699 |  | 08/16/2024 | CC-004037 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |



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| PX700 |  | 08/16/2024 | CC-004038 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX701 |  | 08/16/2024 | CC-004039 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX702 |  | 8/16/2024  | CC-004040 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX703 |  | 8/16/2024  | CC-004041 | Business Development Strategy   | Complete | 5 Years  |
| PX716 |  | 8/16/2024  | CC-005144 | Trade Secret and Product Development  | Complete | 10 Years |
| PX717 |  | 9/6/2024   | CC-005853 | Business Development Strategy   | Complete | 5 Years  |
| PX719 |  | 9/6/2024   | CC-005977 | Trade Secret and Product Development; Business Development Strategy                               | Complete | 10 Years |
| PX720 |  | 9/6/2024   | CC-005999 | Trade Secret and Product Development; Business Development Strategy; Sales and Marketing Strategy | Complete | 10 Years |
| PX721 |  | 9/9/2024   | CC-006000 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX722 |  | 9/9/2024   | CC-006038 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX723 |  | 9/9/2024   | CC-006039 | Trade Secret and Product Development; Pricing and Pricing Strategy                                | Complete | 10 Years |
| PX724 |  | 9/9/2024   | CC-006040 | Trade Secret and Product Development; Pricing and Pricing Strategy; Business Development Strategy | Complete | 10 Years |
| PX731 |  |            | CC-006050 | Trade Secret and Product Development; Business Development Strategy                               | Complete | 10 Years |
| PX732 |  |            | CC-006051 | Business Development Strategy   | Complete | 5 Years  |
| PX735 |  | 12/22/2020 | CC-006117 | Business Development Strategy; Sales and Marketing Strategy                                       | Complete | 5 Years  |
| PX737 |  | 6/3/2019   | CC-006122 | Business Development Strategy   | Complete | 5 Years  |
| PX742 |  | 4/2/2019   | CC-006192 | Sales and Marketing Strategy; Business Development Strategy                                       | Complete | 5 Years  |

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| PX743 |  | 9/21/2021  | CC-006195 | Trade Secret and Product Development; Business Development Strategy         | Complete | 10 Years   |
| PX744 |  | 3/19/2019  | CC-006205 | Internal User Data and Financial Information; Business Development Strategy | Complete | 5 Years    |
| PX745 |  |            | CC-006207 | Business Development Strategy; Sales and Marketing Strategy                 | Complete | 5 Years    |
| PX746 |  | March 2019 | CC-006208 | Business Development Strategy   | Complete | 5 Years    |
| PX747 |  |            | CC-006209 | Trade Secret and Product Development; Business Development Strategy         | Complete | 10 Years   |
| PX748 |  |            | CC-006243 | Sales and Marketing Strategy; Business Development Strategy                 | Complete | 5 Years    |
| PX749 |  |            | CC-006244 | Trade Secret  | Complete | 10 Years   |
| PX750 |  | 3/22/2019  | CC-006245 | Personal Information  | Complete | Indefinite |
| PX751 |  |            | CC-006247 | Business Development Strategy   | Complete | 5 Years    |
| PX758 |  | 2/18/2018  | CC-006255 | Personal Information  | Complete | Indefinite |
| PX759 |  | Unknown    | CC-006256 | Taxpayer Personal Information   | Complete | Indefinite |
| PX760 |  | Unknown    | CC-006257 | Taxpayer Personal Information   | Complete | Indefinite |
| PX761 |  | Unknown    | CC-006258 | Taxpayer Personal Information   | Complete | Indefinite |
| PX762 |  | Unknown    | CC-006259 | Taxpayer Personal Information   | Complete | Indefinite |
| PX763 |  | Unknown    | CC-006260 | Taxpayer Personal Information   | Complete | Indefinite |
| PX764 |  | Unknown    | CC-006261 | Taxpayer Personal Information   | Complete | Indefinite |
| PX765 |  | Unknown    | CC-006262 | Taxpayer Personal Information   | Complete | Indefinite |
| PX766 |  | Unknown    | CC-006263 | Taxpayer Personal Information   | Complete | Indefinite |
| PX767 |  | Unknown    | CC-006264 | Taxpayer Personal Information   | Complete | Indefinite |
| PX768 |  | Unknown    | CC-006265 | Taxpayer Personal Information   | Complete | Indefinite |
| PX769 |  | Unknown    | CC-006266 | Taxpayer Personal Information   | Complete | Indefinite |
| PX770 |  | Unknown    | CC-006267 | Taxpayer Personal Information   | Complete | Indefinite |
| PX771 |  | Unknown    | CC-006268 | Taxpayer Personal Information   | Complete | Indefinite |
| PX772 |  | Unknown    | CC-006269 | Taxpayer Personal Information   | Complete | Indefinite |
| PX773 |  | Unknown    | CC-006270 | Taxpayer Personal Information   | Complete | Indefinite |
| PX774 |  | Unknown    | CC-006271 | Taxpayer Personal Information   | Complete | Indefinite |
| PX775 |  | 4/9/2019   | CC-006272 | Personal Information  | Complete | Indefinite |
| PX776 |  | 1/26/2020  | CC-006274 | Personal Information  | Complete | Indefinite |
| PX782 |  | 08/30/2024 | CC-006281 | Trade Secret and Product Development  | Complete | 10 Years   |
| PX783 |  | 08/30/2025 | CC-006282 | Trade Secret and Product Development  | Complete | 10 Years   |
| PX784 |  | 08/30/2026 | CC-006288 | Trade Secret and Product Development  | Complete | 10 Years   |

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| PX785  |  | 08/30/2027     | CC-006289         | Trade Secret and Product Development   | Complete | 10 Years |
| PX786  |  | 08/30/2028     | CC-006301         | Trade Secret and Product Development   | Complete | 10 Years |
| PX787  |  | 08/30/2029     | CC-006302         | Trade Secret and Product Development   | Complete | 10 Years |
| RX0024 |  | 11/29/2023     | HRBD_FTC_00149156 | Sales and Marketing Strategy ; Business Development Strategy                                       | Complete | 5 Years  |
| RX0062 |  |                | HRBD-FTC-00034900 | Trade Secret and Product Development; Sales and Marketing Strategy ; Business Development Strategy | Complete | 10 Years |
| RX0063 |  | 12/2/2018      | HRBD-FTC-00072560 | Trade Secret and Product Development; Sales and Marketing Strategy ; Business Development Strategy | Complete | 10 Years |
| RX0065 |  | 10/26/2020     | HRBD_FTC_00132044 | Trade Secret and Product Development; Sales and Marketing Strategy ; Business Development Strategy | Complete | 10 Years |
| RX0066 |  | 4/30/2019      | HRBD_FTC_00157882 | Sales and Marketing Strategy ; Business Development Strategy                                       | Complete | 5 Years  |
| RX0067 |  | 12/2023-4/2024 | HRBD_FTC_00166632 | Sales and Marketing Strategy; Business Development Strategy  | Complete | 5 Years  |
| RX0071 |  |                | HRBD_FTC_00141759 | Trade Secret and Product Development; Business Development Strategy                                | Complete | 10 Years |
| RX0072 |  |                | HRBD_FTC_00141761 | Trade Secret and Product Development; Business Development Strategy                                | Complete | 10 Years |
| RX0073 |  |                | HRBD_FTC_00141762 | Trade Secret and Product Development; Business Development Strategy                                | Complete | 10 Years |
| RX0074 |  |                | HRBD_FTC_00141763 | Trade Secret and Product Development; Business Development Strategy                                | Complete | 10 Years |
| RX0075 |  |                | HRBD_FTC_00141764 | Trade Secret and Product Development; Business Development Strategy                                | Complete | 10 Years |
| RX0076 |  |                | HRBD_FTC_00141765 | Trade Secret and Product Development; Business Development Strategy                                | Complete | 10 Years |
| RX0077 |  |                | HRBD_FTC_00149210 | Trade Secret and Product Development; Business Development Strategy                                | Complete | 10 Years |

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| RX0078 |  |            | HRBD_FTC_00149215 | Trade Secret and Product Development; Business Development Strategy                                | Complete | 10 Years |
| RX0079 |  |            | HRBD_FTC_00149220 | Trade Secret and Product Development; Business Development Strategy                                | Complete | 10 Years |
| RX0080 |  |            | HRBD_FTC_00161960 | Trade Secret and Product Development; Business Development Strategy                                | Complete | 10 Years |
| RX0081 |  | 11/30/2023 | HRBD_FTC_00149198 | Trade Secret and Product Development; Sales and Marketing Strategy; Business Development Strategy  | Complete | 10 Years |
| RX0082 |  | 1/19/2024  | HRBD_FTC_00149206 | Trade Secret and Product Development; Sales and Marketing Strategy; Business Development Strategy  | Complete | 10 Years |
| RX0083 |  | 11/3/2020  | HRBD_FTC_00133633 | Trade Secret and Product Development; Sales and Marketing Strategy ; Business Development Strategy | Complete | 10 Years |
| RX0084 |  | 12/8/2022  |                   | Trade Secret and Product Development   | Complete | 10 Years |
| RX0113 |  | 6/14/2024  |                   | Internal User Data and Financial Information; Business Development Strategy                        | Complete | 5 Years  |
| RX0114 |  | 5/10/2024  |                   | Internal User Data and Financial Information; Business Development Strategy                        | Complete | 5 Years  |
| RX0115 |  | 5/10/2024  |                   | Internal User Data and Financial Information; Business Development Strategy                        | Complete | 5 Years  |
| RX0116 |  | 6/21/2024  |                   | Internal User Data and Financial Information; Business Development Strategy                        | Complete | 5 Years  |
| RX0117 |  | 6/21/2024  |                   | Internal User Data and Financial Information; Business Development Strategy                        | Complete | 5 Years  |
| RX0118 |  | 6/28/2024  |                   | Internal User Data and Financial Information; Business Development Strategy                        | Complete | 5 Years  |
| RX0119 |  | 6/28/2024  |                   | Internal User Data and Financial Information; Business Development Strategy                        | Complete | 5 Years  |

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| RX0120 |  | 8/2/2024  |  | Internal User Data and Financial Information; Business Development Strategy                               | Complete | 5 Years  |
| RX0121 |  | 8/2/2024  |  | Internal User Data and Financial Information; Business Development Strategy                               | Complete | 5 Years  |
| RX0122 |  | 7/31/2024 |  | Internal User Data and Financial Information; Business Development Strategy                               | Complete | 5 Years  |
| RX0124 |  | 8/9/2024  |  | Sales and Marketing Strategy; Business Development Strategy; Internal User Data and Financial Information | Partial  | 5 Years  |
| RX0125 |  |           |  | Sales and Marketing Strategy; Business Development Strategy; Internal User Data and Financial Information | Complete | 5 Years  |
| RX0126 |  | 7/18/2024 |  | Sales and Marketing Strategy; Business Development Strategy; Internal User Data and Financial Information | Complete | 5 Years  |
| RX0187 |  | 8/16/2024 |  | Business Development Strategy   | Complete | 5 Years  |
| RX0192 |  | 9/9/2024  |  | Business Development Strategy   | Complete | 5 Years  |
| RX0193 |  | 9/9/2024  |  | Business Development Strategy   | Complete | 5 Years  |
| RX0194 |  | 8/16/2024 |  | Trade Secret and Product Development  | Complete | 10 Years |
| RX0195 |  | 8/16/2024 |  | Trade Secret and Product Development  | Complete | 10 Years |
| RX0196 |  | 8/16/2024 |  | Trade Secret and Product Development  | Complete | 10 Years |
| RX0197 |  | 8/16/2024 |  | Trade Secret and Product Development  | Complete | 10 Years |
| RX0198 |  | 9/9/2024  |  | Trade Secret and Product Development  | Complete | 10 Years |
| RX0199 |  | 9/9/2024  |  | Trade Secret and Product Development  | Complete | 10 Years |
| RX0200 |  | -06-11    |  | Trade Secret and Product Development  | Complete | 10 Years |
| RX0201 |  | 8/16/2024 |  | Trade Secret and Product Development; Pricing and Pricing Strategy  | Complete | 10 Years |
| RX0202 |  | 8/16/2024 |  | Trade Secret and Product Development; Pricing and Pricing Strategy  | Complete | 10 Years |

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| RX0203 |  | 8/16/2024 |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0204 |  | 8/16/2024 |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0205 |  | 8/16/2024 |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0206 |  | 8/16/2024 |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0207 |  | 9/9/2024  |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0208 |  | 9/9/2024  |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0209 |  | 9/9/2024  |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0210 |  | 9/9/2024  |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0215 |  | 9/16/2024 |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0216 |  | 8/16/2024 |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0217 |  |           |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0227 |  | 9/18/2024 |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0228 |  |           |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0229 |  |           |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |
| RX0230 |  |           |  | Trade Secret and Product Development; Pricing and Pricing Strategy | Complete | 10 Years |

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| RX0231 |           |  | Trade Secret and Product Development; Pricing and Pricing Strategy          | Complete | 10 Years |
| RX0232 |           |  | Trade Secret and Product Development; Pricing and Pricing Strategy          | Complete | 10 Years |
| RX0233 |           |  | Trade Secret and Product Development; Pricing and Pricing Strategy          | Complete | 10 Years |
| RX0234 |           |  | Trade Secret and Product Development; Pricing and Pricing Strategy          | Complete | 10 Years |
| RX0235 |           |  | Trade Secret and Product Development; Pricing and Pricing Strategy          | Complete | 10 Years |
| RX0236 |           |  | Trade Secret and Product Development; Pricing and Pricing Strategy          | Complete | 10 Years |
| RX0237 |           |  | Trade Secret and Product Development; Pricing and Pricing Strategy          | Complete | 10 Years |
| RX0238 | 8/30/2024 |  | Sales and Marketing Strategy; Business Development Strategy                 | Complete | 5 Years  |
| RX0239 | 8/30/2024 |  | Sales and Marketing Strategy; Business Development Strategy                 | Complete | 5 Years  |
| RX0240 | 8/30/2024 |  | Sales and Marketing Strategy; Business Development Strategy                 | Complete | 5 Years  |
| RX0241 | 8/30/2024 |  | Sales and Marketing Strategy; Business Development Strategy                 | Complete | 5 Years  |
| RX0242 | 8/30/2024 |  | Sales and Marketing Strategy; Business Development Strategy                 | Complete | 5 Years  |
| RX0243 | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years  |
| RX0244 | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years  |
| RX0245 | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years  |
| RX0246 | 9/6/2024  |  | Internal User Data and Financial Information; Business Development Strategy | Complete | 5 Years  |
| RX0247 | 8/30/2024 |  | Internal User Data and Financial Information; Business Development Strategy | Complete | 5 Years  |

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| RX0248 |  | 8/30/2024 |  | Internal User Data and Financial Information; Business Development Strategy | Complete | 5 Years |
| RX0249 |  | 8/30/2024 |  | Internal User Data and Financial Information; Business Development Strategy | Complete | 5 Years |
| RX0250 |  | 8/30/2024 |  | Internal User Data and Financial Information; Business Development Strategy | Complete | 5 Years |
| RX0251 |  | 9/6/2024  |  | Internal User Data and Financial Information; Business Development Strategy | Complete | 5 Years |
| RX0252 |  | 8/30/2024 |  | Internal User Data and Financial Information; Business Development Strategy | Complete | 5 Years |
| RX0253 |  | 9/6/2024  |  | Internal User Data and Financial Information; Business Development Strategy | Complete | 5 Years |
| RX0254 |  | 8/30/2024 |  | Internal User Data and Financial Information; Business Development Strategy | Complete | 5 Years |
| RX0255 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |
| RX0256 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |
| RX0257 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |
| RX0258 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |
| RX0259 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |
| RX0260 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |
| RX0261 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |
| RX0262 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |
| RX0263 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |
| RX0264 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |
| RX0265 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |
| RX0266 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |
| RX0267 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |
| RX0268 |  | 8/30/2024 |  | Business Development Strategy   | Complete | 5 Years |



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| RX0269 |  | 8/30/2024 |  | Business Development Strategy        | Complete | 5 Years  |
| RX0270 |  | 8/30/2024 |  | Business Development Strategy        | Complete | 5 Years  |
| RX0271 |  | 8/30/2024 |  | Business Development Strategy        | Complete | 5 Years  |
| RX0272 |  | 8/30/2024 |  | Business Development Strategy        | Complete | 5 Years  |
| RX0273 |  | 8/30/2024 |  | Business Development Strategy        | Complete | 5 Years  |
| RX0274 |  | 8/30/2024 |  | Business Development Strategy        | Complete | 5 Years  |
| RX0275 |  | 8/30/2024 |  | Business Development Strategy        | Complete | 5 Years  |
| RX0276 |  | 8/30/2024 |  | Business Development Strategy        | Complete | 5 Years  |
| RX0277 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0278 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0279 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0280 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0281 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0282 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0283 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0284 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0285 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0286 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0287 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0288 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0289 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0290 |  | 8/30/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0291 |  | 9/3/2024  |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0292 |  | 9/3/2024  |  | Trade Secret and Product Development | Complete | 10 Years |

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| RX0293 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0294 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0295 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0296 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0297 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0298 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0299 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0300 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0301 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0302 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0303 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0304 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0305 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0306 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0307 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0308 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0309 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0310 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0311 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0312 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |
| RX0313 |  | 9/3/2024 |  | Trade Secret and Product Development | Complete | 10 Years |

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| RX0314 |  | 9/3/2024             |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0315 |  | 9/3/2024             |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0316 |  | 9/3/2024             |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0317 |  | 9/3/2024             |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0318 |  | 9/4/2024             |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0319 |  | 9/4/2024             |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0320 |  | 9/4/2024             |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0321 |  | 9/4/2024             |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0322 |  | 9/3/2024             |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0323 |  | 9/3/2024             |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0324 |  | 9/3/2024             |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0325 |  | 9/3/2024             |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0326 |  | 12/2023              |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0327 |  | 2021                 |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0328 |  | 2024                 |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0329 |  | 1/1/2024 - 8/22/2024 |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0330 |  | 1/1/2024 - 8/22/2024 |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0331 |  | 1/1/2024 - 8/22/2024 |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0332 |  | 1/1/2024 - 8/22/2024 |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0333 |  | 1/1/2024 - 8/22/2024 |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0334 |  | 1/1/2024 - 8/22/2024 |  | Trade Secret and Product Development   | Complete | 10 Years |
| RX0380 |  |                      |  | Trade Secret and Product Development; Internal User Data and Financial Information | Complete | 10 Years |

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| RX0405 |  | 2/5/2024  | HRBD_FTC_00164124 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0406 |  | 2/15/2024 | HRBD_FTC_00164125 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0407 |  | 2/29/2024 | HRBD_FTC_00167019 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0408 |  | 2/29/2024 | HRBD_FTC_00167030 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0409 |  | 2/29/2024 | HRBD_FTC_00167031 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0410 |  | 2/29/2024 | HRBD_FTC_00167032 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0411 |  | 2/29/2024 | HRBD_FTC_00167034 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0412 |  | 2/29/2024 | HRBD_FTC_00167035 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0413 |  | 2/29/2024 | HRBD_FTC_00167036 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0414 |  | 3/7/2024  | HRBD_FTC_00164188 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0415 |  | 3/14/2024 | HRBD_FTC_00164207 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0416 |  | 3/14/2024 | HRBD_FTC_00164209 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0417 |  | 3/14/2024 | HRBD_FTC_00164210 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0418 |  | 3/14/2024 | HRBD_FTC_00164211 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0419 |  | 3/14/2024 | HRBD_FTC_00164212 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |
| RX0420 |  | 3/14/2024 | HRBD_FTC_00164215 | Sales and Marketing Strategy;<br>Business Development Strategy | Complete | 5 Years |

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| RX0421 |  | 3/14/2024 | HRBD_FTC_00164216 | Sales and Marketing Strategy;<br>Business Development Strategy             | Complete | 5 Years    |
| RX0422 |  | 3/14/2024 | HRBD_FTC_00164217 | Sales and Marketing Strategy;<br>Business Development Strategy             | Complete | 5 Years    |
| RX0423 |  | 3/14/2024 | HRBD_FTC_00164218 | Sales and Marketing; Business<br>Development Strategy                      | Complete | 5 Years    |
| RX0424 |  | 3/14/2024 | HRBD_FTC_00164219 | Sales and Marketing; Business<br>Development Strategy                      | Complete | 5 Years    |
| RX0425 |  | 3/28/2024 | HRBD_FTC_00167040 | Personal Information; Business<br>Development Strategy                     | Complete | Indefinite |
| RX0426 |  |           | HRBD_FTC_00156895 | Trade Secrets and Product<br>Development; Business<br>Development Strategy | Complete | 10 Years   |
| RX0428 |  |           | HRBD_FTC_00156896 | Trade Secrets and Product<br>Development; Business<br>Development Strategy | Complete | 10 Years   |
| RX0429 |  |           | HRBD_FTC_00156897 | Trade Secrets and Product<br>Development; Business<br>Development Strategy | Complete | 10 Years   |
| RX0434 |  |           | HRBD_FTC_00151943 | Trade Secrets and Product<br>Development; Business<br>Development Strategy | Complete | 10 Years   |
| RX0435 |  |           | HRBD_FTC_00153107 | Trade Secrets and Product<br>Development; Business<br>Development Strategy | Complete | 10 Years   |
| RX0436 |  |           | HRBD_FTC_00153256 | Trade Secrets and Product<br>Development; Business<br>Development Strategy | Complete | 10 Years   |
| RX0437 |  |           | HRBD_FTC_00153294 | Trade Secrets and Product<br>Development; Business<br>Development Strategy | Complete | 10 Years   |
| RX0438 |  |           | HRBD_FTC_00154001 | Trade Secrets and Product<br>Development; Business<br>Development Strategy | Complete | 10 Years   |
| RX0439 |  |           | HRBD_FTC_00154571 | Trade Secrets and Product<br>Development; Business<br>Development Strategy | Complete | 10 Years   |
| RX0440 |  |           | HRBD_FTC_00154806 | Trade Secrets and Product<br>Development; Business<br>Development Strategy | Complete | 10 Years   |
| RX0441 |  |           | HRBD_FTC_00155038 | Trade Secrets and Product<br>Development; Business<br>Development Strategy | Complete | 10 Years   |
| RX0442 |  |           | HRBD_FTC_00155126 | Trade Secrets and Product<br>Development; Business<br>Development Strategy | Complete | 10 Years   |

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| RX0443 |  |          | HRBD_FTC_00155962 | Trade Secrets and Product Development; Business Development Strategy   | Complete | 10 Years |
| RX0444 |  |          | HRBD_FTC_00156300 | Trade Secrets and Product Development; Business Development Strategy   | Complete | 10 Years |
| RX0445 |  |          | HRBD_FTC_00156794 | Trade Secrets and Product Development; Business Development Strategy   | Complete | 10 Years |
| RX0446 |  | 3/5/2019 | HRBD_FTC_00101150 | Trade Secrets and Product Development; Business Development Strategy; Pricing and Pricing Strategy; Sales and Marketing Strategy | Complete | 10 Years |