

**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' SECOND MOTION FOR *IN CAMERA* TREATMENT**

In connection with its claim that it is “unfair” under the FTC Act for H&R Block to require additional steps of consumers to downgrade from a higher-tier product to a lower-tier product, Complaint Counsel have argued that Respondents can and should re-design their website to include a single button that allows customers to downgrade to any product without having to delete all of the data entered up to that point. Addressing this argument requires that H&R Block explain how its online DIY products work, including the design of its underlying systems and their functionality, all of which are closely guarded trade secrets developed after years of research and development.

Respondents H&R Block Inc., HRB Digital LLC, and HRB Tax Group, Inc. (“H&R Block”) make this second motion 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). Per the Court’s October 11, 2024 Order on Respondents’ Motion for In Camera Treatment, H&R Block has carefully reviewed all documents

for which it sought *in camera* treatment previously, and has narrowed its request to only those documents that comply with the Commission's strict standards. H&R Block has removed 217 documents from its list for which it seeks *in camera* treatment, and several of the remaining documents are duplicates of documents that Complaint Counsel and H&R Block both maintain on their trial exhibit lists.

The documents, transcripts, and testimony, which are the subject of this Second Motion contain highly sensitive, confidential information, and public disclosure would likely cause H&R Block a clearly defined, serious injury, as more thoroughly explained in the Declaration of Heather Watts, Declaration of Jeremy Isaacson, and Declaration of Wendy Fitch attached hereto as Exhibits 1, 2, and 3 respectively.

In particular, H&R Block's source code and related data, such as documents setting forth H&R Block's system architecture and design flow, as well as deposition testimony about H&R Block's product and system designs constitute H&R Block's trade secrets, and should be given *in camera* treatment. These documents, if made public, provide the ingredients for competitors to duplicate H&R Block's DIY products at the center of this dispute. H&R Block has invested significant time and resources in developing the products and information reflected in those documents and it would be a serious competitive injury to H&R Block were that information to be made public. Indeed, this information is so sensitive, Complaint Counsel agrees that the source code should be granted *in camera* treatment.

In addition to the documents containing sensitive technical data for which H&R Block renews its motion for *in camera* treatment, H&R Block also seeks *in camera* treatment for a limited number of documents that reflect significant user data and financial information,<sup>1</sup> and H&R

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<sup>1</sup> In addition to agreeing that the source code should receive *in camera* treatment (PX731, RX0079, RX0195), Complaint Counsel agreed that certain system architecture and design documents (PX165, PX782-PX787, RX0071-

Block's current and ongoing marketing strategy, pricing strategy, and business development strategy. Should this information not receive *in camera* treatment, H&R Block's competitors could use such information to undercut H&R Block's products and competitive advantages and directly market against H&R Block in ways specifically revealed by the documents at issue.

### **LEGAL STANDARD**

H&R Block incorporates by reference the legal standard and caselaw cited in its initial Motion for *In Camera* Treatment. H&R Block further agrees with and incorporates the Court's legal standard cited in its Order on Respondents' Motion for In Camera Treatment. Specifically, "requests for *in camera* treatment must show 'that the public disclosure of the documentary evidence will result in a clearly defined, serious injury to the person or corporation whose records are involved.'" *In re Kaiser Aluminum & Chem. Corp.*, No. 9080, 1984 FTC LEXIS 60, at \*1 n.1 (May 25, 1984) (quoting Hood, 1961 FTC LEXIS 368 at \*11).

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.

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RX0078, RX080, RX0281-RX0286, and RX0434-RX0445) and certain internal user data documents (RX0291-RX0325) should also receive *in camera* treatment.

## ARGUMENT

H&R Block makes this second motion seeking *in camera* treatment of documents and testimony—or portions thereof—that would cause serious injury to H&R Block if made public. H&R Block requests that documents addressing its marketing, business development, and pricing strategy and internal user data or financial information remain confidential for five years; and documents that contain trade secret information, such as the source code for H&R Block’s online DIY product, receive *in camera* treatment for ten years. *See In the Matter of Impax Labs., Inc.*, 2017 WL 4948988, at \*1 (F.T.C. Oct. 23, 2017) (ordering *in camera* treatment for ten years over “documents that include financial and sales projections for future years and pipeline products”).

### **1. H&R Blocks’ Trade Secrets Information Warrants *In Camera* Treatment.**

As set forth in H&R Block’s initial motion for *in camera* treatment, such treatment is appropriate to protect trade secrets, secret formulas, 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); *Illuminia, Inc.*, Docket No. 9401 (F.T.C. Sept. 10, 2021) (order granting respondent’s motion for *in camera* treatment regarding documents containing trade secrets, such as the company’s current and future operations); *Impax Labs, Inc.*, Docket No. 9373 (F.T.C. Oct. 23, 2017) (order granting respondent’s motion for *in camera* treatment concerning documents with research and formulation efforts for products still in development); *Tronox Ltd.*, Docket No. 9377 (F.T.C. May 15, 2018) (order granting respondent’s motion for *in camera* treatment for documents containing information about the company’s production processes and technical specifications of its products).

The FTC has already agreed that H&R Block’s source code is a trade secret and should be afforded *in camera* treatment at trial. The only question is the scope of what other trade secret

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documents and testimony H&R Block seeks to protect. H&R Block's trade secret information includes the architecture and design of H&R Block's online DIY tax preparation products, such as documents that show the flow of H&R Block's iterative interview process for specific tax interview topics. Isaacson Dec. ¶¶ 12-14. In a similar matter, *In the Matter of Intuit, Inc.*, the Court awarded *in camera* treatment for 64 documents containing information reflecting Intuit, Inc.'s trade secrets and product development plans that included details of how the company plans, develops, deploys, and evaluates new products and features. Order on Respondent's Second Motion for In Camera Treatment, No. 9408 (Mar. 21, 2023). H&R Block respectfully requests that this Court grant the same *in camera* treatment for H&R Block's competitively sensitive data contained in the documents referenced in Attachment A to the Isaacson Declaration. The information about H&R Block's software operation is highly sensitive 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 discussions about source code and detailed technical information regarding the H&R Block online products that must be protected from public disclosure.

Public disclosure of this highly sensitive information would cause serious injury, so H&R Block thus respectfully requests this information receive *in camera* treatment.

**2. User Data and Financial Information is Appropriate for *In Camera* Treatment.**

H&R Block renews its request to the Court to obtain *in camera* treatment for documents that include internal user data and financial information. *See Altria Grp.*, 2021 WL 2258803, at \*4-5 (protecting financial data that is fundamental to company's operations); *Intuit, Inc.*, No. 9408

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(Mar. 21, 2023) (granting *in camera* treatment for certain financial and customer data); *See, e.g., 1-800 Contacts*, 2017 F.T.C. LEXIS 55, at \*11-12 (protecting documents containing information on “internal analyses of customer demographics and buying patterns”). 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 used for H&R Block’s product development and improvement. This information could injure H&R Block if revealed publicly. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *See Isaacson Dec.* ¶¶ 16-17. Much of this information is fewer than three years old and deserves *in camera* treatment. *Gen. Foods. Corp.*, 1980 WL 339035, at \*3 n.4 (“Recent sales and profit data generally suggest themselves as being both secret and material to the firm concerned.”).

### 3. Current Marketing Strategy Documents Must Be Protected.

H&R Block also renews its motion with respect to a limited number of documents relating to H&R Block’s current sales, marketing, and advertising strategies. *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

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information); *see also Otto Bock*, 2018 WL 3491602, at \*3 (marketing plans and sales documents may receive *in camera* treatment). These documents reveal how H&R Block intends to bring its product to market in a highly competitive industry, and their public disclosure would thus cause H&R Block harm. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

#### **4. H&R Block’s Pricing and Pricing Strategy Documents Require Confidential Treatment.**

Current documents that contain 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 (protecting documents containing information on “pricing, competitive position, marketing and bidding strategies, and internal analyses of customer demographics and buying patterns”). These

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<sup>2</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)).

documents reflect H&R Block's pricing strategy for its differing online tax preparation products as well as internal price-setting discussions. [REDACTED]

[REDACTED]

Watts Dec. ¶ 13.

**5. Current Business Development Strategy Requires *In Camera* Treatment.**

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 preparation industry.

[REDACTED]



██████████ Watts Dec. ¶¶ 15-17. These documents should receive *in camera* treatment, consistent with similar decisions from this Court. *See Benco Dental*, 2018 FTC LEXIS 156, at \*23 (*in camera* treatment for “strategic business plans”); *I-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); *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.’”).

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

Consistent with the Court’s prior Order on Respondents’ Motion for *In Camera* Treatment, certain documents should be kept confidential because they reflect consumer sensitive personal information. Specifically, RX0318 through RX0321 contain sensitive personal information regarding H&R Block’s customers, including hashed social security numbers and other identifying information. Isaacson Dec. ¶ 18. Moreover, Complaint Counsel agrees that these documents deserve *in camera* treatment.

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Dated: October 16, 2024

Respectfully submitted,

By: /s/ Erin Sindberg Porter

Courtney Lyons Snyder  
Kasey Tuttle  
JONES DAY  
500 Grant Street, Suite 4500  
Pittsburgh, PA 15219-2514  
Telephone: (412) 394-7910  
clsnyder@jonesday.com  
ktuttle@jonesday.com

Joseph Boylan  
JONES DAY  
555 S. Flower Street  
Los Angeles, CA 90071  
Telephone: (910) 639-1886  
jboylan@jonesday.com

Erin Sindberg Porter  
JONES DAY  
90 South Seventh Street  
Suite 4950  
Minneapolis, MN 55402  
Telephone: (612) 217-8926  
esindbergporter@jonesday.com

Antonio F. Dias  
Erika Whyte  
Angela Korge  
JONES DAY  
600 Brickell Avenue, Suite 3300  
Miami, FL 33131  
Telephone: (305) 714-9800  
afdias@jonesday.com  
ewhyte@jonesday.com  
akorge@jonesday.com

Carol A. Hogan  
JONES DAY  
110 North Wacker Drive Suite 4800  
Chicago, IL 60606  
Telephone: (312) 269-4241  
chogan@jonesday.com

Hashim M. Mooppan  
JONES DAY  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20001  
Telephone: (202) 879-3744  
hmmooppan@jonesday.com

Amanda L. Dollinger  
JONES DAY  
250 Vesey Street,  
New York, NY 10281-1047  
Tel: (212) 326-3475  
adollinger@jonesday.com

**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' 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 agrees to stipulate to *in camera* treatment of the following exhibits: **PX165, PX731, PX782 – PX787, RX0071 – RX0080, RX0195, RX0281 – RX0287, RX0291 – RX0325, RX0434 – RX0445**. 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 16, 2024, I filed 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 16, 2024, I caused the foregoing document to be served via email to:

Claire Wack  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
cwack@ftc.gov

Simon Barth  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
sbarth@ftc.gov

Christopher E. Brown  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
cbrown3@ftc.gov

Joshua A. Doan  
600 Pennsylvania Avenue, NW  
Washington, DC 20580  
jdoan@ftc.gov

*Counsel Supporting the Complaint*

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

Dated: October 16, 2024

Respectfully submitted,

By: /s/ Erin Sindberg Porter

*Counsel for H&R Block, Inc., HRB  
Digital LLC, & HRB Tax Group, Inc.*

# **EXHIBIT A**

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

**In the matter of**

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**[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 1**



**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.

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**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 to individuals 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.

5. I understand that Complaint Counsel's exhibit list included over 650 documents, 71 of which H&R Block seeks confidential treatment in whole or in part. H&R Block's exhibit list included 446 documents, 121 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 A.

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.

**Internal User Data and Financial Information**

9. H&R Block produced documents reflecting internal user data and financial information, including the number of users using differing products, revenue information, and user response to differing aspects of the H&R Block products.

10. For example, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The public release of these materials would harm H&R Block because 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 in specific non-public segments and types of customer service calls

and response strategies to customer service calls. H&R Block's competitors could alter their

strategies using these documents in an effort to take business from H&R Block's online DIY

products. I believe this information should remain confidential.

11. [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.

The public release of these materials would harm H&R Block because they reveal its current and

prospective financial condition and related financial strategy, which is important to its ability to

compete in the market. H&R Block's competitors could use this information to plan their own

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competitive business strategy based on H&R Block's financial state, particularly as this information is broken down by specific products and features, thus permitting H&R Block's competitors to develop products and channel further investments into products that directly compete with H&R Block's strongest products or features.

12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

If this information were public, H&R Block's competitors would be able to utilize this information to H&R Block's competitive disadvantage, as they could exploit H&R Block's vulnerabilities by improving their own customer contact or downgrade experiences, highlighting such improvements or vulnerabilities in their marketing, or similarly review H&R Block's strengths in customer contact and improve their own consumer experience based on H&R Block's proprietary information.

### **Pricing and Pricing Strategy**

13. 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]

[REDACTED]

[REDACTED] Permitting H&R Block's competitors to access H&R Block's pricing analyses 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 evaluates its competitive pricing features, which H&R Block has spent significant time and resources developing.

**Business Development Strategy**

14. H&R Block produced documents reflecting its strategic plans and other forward-looking business plans.

15. [REDACTED]

[REDACTED] I believe this information should remain confidential. 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 these current strategic business plans to plan their own competitive activities to directly compete with H&R Block's successful performance or upcoming enhancements to its products or unfairly undermine H&R Block's plans for growth.

16. [REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] If made public, these documents analyzing ongoing strategy considerations and differing downgrade options could be used in direct competition with H&R Block by its competitors, by undercutting such strategies, making them less viable, or improving upon their own downgrading options in direct competition with H&R Block's.

17. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] If made public, H&R Block's competitors could gain insight into specific projects and features of H&R Block's products and use this information to undercut H&R Block's competitive advantages.

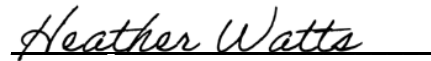
18. For each category, the examples provided are merely representative—they are not meant to be an exhaustive list of the types of documents in that category that appear on the parties' exhibit lists and that should be afforded in camera treatment because releasing them to the public would seriously 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.

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19. 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 16, 2024

A handwritten signature in cursive script that reads "Heather Watts" is written over a solid horizontal line.

Heather Watts

# **EXHIBIT 2**



**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION  
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**In the matter of**

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

**DOCKET NO. 9427  
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**DECLARATION OF JEREMY ISAACSON**

1. My name is Jeremy Isaacson. I am a Technology Manager at H&R Block.
2. I am responsible for platform, tools, and cloud infrastructure of tax systems for H&R Block.
3. I am currently a member of H&R Block's engine platform team that deals with all tooling, infrastructure, and engine generator code.
4. I am familiar with H&R Block's policies and procedures regarding the protection of certain confidential information, and I have personal knowledge of how the public disclosure of certain types of confidential information would harm H&R Block.
5. In the ordinary course of business, H&R Block keeps much of its information strictly confidential and limits its distribution to individuals 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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6. I understand that Complaint Counsel's trial exhibit list included over 650 documents, 71 of which H&R Block seeks confidential treatment in whole or in part. H&R Block's exhibit list included 446 documents, 121 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 A.

7. 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, many of which I am familiar with in the course of my duties. I have reviewed certain documents, and I have received information from individuals on whom I regularly rely.

8. Approximately 114 documents for which H&R Block seeks *in camera* treatment contain highly sensitive trade secrets comprised of H&R Block's technical information and user data. I am familiar with most, if not all, of these documents and have participated in the creation, direction, or substance of several of them.

9. Based on 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 certain technical and trade secret, user data, and personal information 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 design and technical information specific to H&R Block's products, which H&R Block takes great care to keep confidential. 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 product features.

### **Trade Secrets and Product Development**

10. H&R Block's documents containing trade secrets and product development plans detail potential highly sensitive information regarding code, design, and function of H&R Block's products that are confidential, nonpublic, and specific to H&R Block's offerings.

11. PX731 and RX0079 are the source code for H&R Block's online DIY products and RX0195 is a compilation of excerpted portions of the source code. These exhibits contain the literal coding that dictates, instructs, and commands how the online DIY products operate. This code is kept highly confidential to H&R Block and is not public. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12. PX165 and RX0071 through RX0078 are system architecture documents, detailing the technical architecture of H&R Block's online DIY products and how the various components of those products are organized and interact. RX0080 reflects the complete schema of the JSON object used by the DIY online products, and RX0434 through RX0445 are design documents reflecting the detailed design features and tax interview flows for specific topics within H&R Block's online DIY products. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Further, portions of PX716 (which is the same document as RX0194), PX719, RX0215, RX0216, and RX0277, which are the expert reports and deposition testimony of Rick Watts and Ron Schnell, contain specific and detailed discussions of H&R Block's system and product design, which is not public information. [REDACTED]

[REDACTED]

13. [REDACTED]

[REDACTED]

14. 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

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<sup>1</sup> RX0287 is not included in Complaint Counsel's exhibit list but is also included in this category of documents. Moreover, one tab in the spreadsheet of PX720 (which is the same as RX0200) contains the same data as PX787.

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 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.

### **Internal User Data and Financial Information**

15. H&R Block also produced documents reflecting internal user data, including the number of users using differing products and specific information regarding the users' product experience. This information is nonpublic and confidential to H&R Block, as such information is only disseminated to individuals who need the information with respect to their duties for the company.

16. RX0291 through RX0325 are files containing detailed user data about when and how customers interact with the differing H&R Block products during the course of completing the tax interview and preparing their tax returns. Moreover, and as discussed further below in paragraph 18, RX0318 through RX0321 contain taxpayer personal information. Each entry in these files reflects data about H&R Block's customers, including user IDs that are specific to each customer, and in the aggregate, the data constitutes material non-public information regarding the usage of H&R Block's DIY online products and certain characteristics of H&R Block's DIY online customer base. If competitors and the public were to have access to H&R Block's detailed user data, H&R Block's competitors would be able to use this information to undercut H&R Block's marketing and otherwise cause competitive harm. [REDACTED]

[REDACTED]

[REDACTED]

17. Additionally, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Moreover, portions of PX664 (which is the same as RX0201), PX721 (which

is the same as RX0201), and RX0227, which are the reports and deposition testimony of expert

Youseff Benzarti, summarize the user data provided in the previously listed exhibits. PX524 and

PX525 are discovery responses similarly containing this user data information. This information

is nonpublic and confidential to H&R Block. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Taxpayer Personal Information**

18. Certain of the technical documents containing user data discussed above reflect

taxpayer personal information. Specifically, RX0318 through RX0321 contain sensitive personal

information regarding H&R Block’s customers, including hashed social security numbers and

corresponding user IDs. Considering the file types and sizes, it is impractical to redact out this

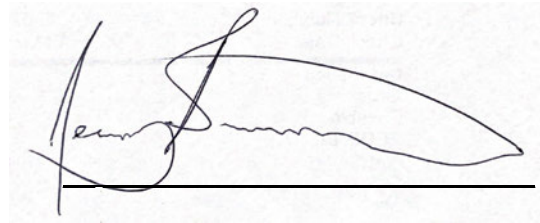
personal information.

**PUBLIC**

19. 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 16, 2024

A handwritten signature in black ink, appearing to read 'Jeremy Isaacson', is written over a solid black horizontal line. The signature is fluid and cursive, with a large initial 'J' and 'I'.

Jeremy Isaacson

# **EXHIBIT 3**



**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**

**DECLARATION OF WENDY FITCH**

1. My name is Wendy Fitch. I am Vice President of Brand, Content, and Insights at H&R Block.
2. In this role, I lead a team responsible for the advertising content of all H&R Block products, including online and television advertising.
3. I am familiar with H&R Block's policies and procedures regarding the protection of certain confidential information, and I have personal knowledge of how the public disclosure of certain 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 to individuals 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.

5. I understand that Complaint Counsel's trial exhibit list in this matter includes over 650 documents, 71 of which H&R Block seeks confidential treatment in whole or in part. H&R Block's exhibit list included 446 documents, 121 documents for which it seeks confidential treatment in whole or in part. A complete list of the documents for which H&R Block seeks *in camera* treatment is attached as Attachment A.

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. Five documents for which H&R Block seeks *in camera* treatment contain H&R Block's highly sensitive sales and marketing strategies. I have reviewed these documents specifically.

8. Based on 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 containing confidential sales and marketing strategies in Attachment A would result in substantive competitive and financial injury to H&R Block. As explained further below, such disclosure would allow H&R Block's competitors to gain insight into, among other things, H&R Block's current and ongoing proprietary marketing strategies. H&R Block's competitors in the highly competitive tax industry could utilize such information to market directly and specifically against H&R Block based on its marketing strategies.

**Sales and Marketing Strategy**

9. Several of the documents identified in Attachment A 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.

10. For example, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11. If these documents were to become public, H&R Block’s competitors could identify the customers that H&R Block targets with its advertisements, which of H&R Block’s advertisements were performing well generally and per target audience, and the various factors it focuses on regarding ad performance. H&R Block’s competitors could thus use this information to market directly and specifically against H&R Block, to undercut H&R Block’s best performing messages to H&R Block’s competitive disadvantage, and undermine its success and ad resonation with specific targeted consumers.


**PUBLIC**

12. 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. This is particularly so considering the information is not only current, but also reflects ongoing and future strategy.

13. 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 16, 2024

  
\_\_\_\_\_  
Wendy Fitch

# **ATTACHMENT A**

PUBLIC

**ATTACHMENT A TO DECLARATIONS OF HEATHER WATTS, JEREMY ISAACSON, AND WENDY FITCH, IN SUPPORT OF SECOND IN CAMERA MOTION**

Exhibit Number	Exhibit Description	Date	Bates No.	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX042		Unknown	CC-000089	Internal User Data and Financial Information; Business Development Strategy	Complete	5 Years
PX071		6/29/2019	CC-000230	Business Development Strategy; pricing/Pricing Strategy	Complete	5 Years
PX076		4/21/2021	CC-000459	Business Development Strategy; 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
PX100		3/1/2024	CC-000965	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
PX102		3/17/23	CC-001023	Business Development Strategy	Complete	5 Years
PX104		9/17/21	CC-001027	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
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
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

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PX147		Unown	CC-001544	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		3/1/2024	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
PX166		2/2/23	CC-001799	Business Development Strategy	Complete	5 Years
PX167		1/26/23	CC-001800	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
PX168		2/16/23	CC-001801	Business Development Strategy	Complete	5 Years
PX169		3/11/23	CC-001802	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
PX172		9/19/23	CC-001861	Business Development Strategy	Complete	5 Years
PX173		2/15/24	CC-001865	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; Taxpayer Personal Information	Complete	5 Years
PX175		03/15/2023	CC-001870	Internal User Data and Financial Information; Pricing/Pricing Strategy; Business Development Strategy	Complete	5 Years

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PX177		01/07/2023	CC-001874	Internal User Data and Financial Information; Business Development Strategy	Complete	5 Years
PX178		02/24/2024	CC-001875	Internal User Data and Financial Information; Business Development Strategy	Complete	5 Years
PX179		02/29/2024	CC-001876	Internal User Data and Financial Information; Business Development Strategy	Complete	5 Years
PX180		02/29/2024	CC-001877	Internal User Data and Financial Information; Business Development Strategy	Complete	5 Years
PX197		05/30/2024	CC-001933	Internal User Data and Financial Information; Pricing Strategy; Business Development Strategy	Redact	10 Years
PX207			CC-002248	Trade Secret and Product Development	Redact	10 Years
PX515		2/1/2024	CC-003562	Sales and Marketing Strategy; Business Development Strategy	Complete	5 Years
PX524		7/31/2024	CC-003714	Internal User Data and Financial Information; Business Development Strategy	Redact	5 Years
PX525		8/2/2024	CC-003727	Internal User Data and Financial Information; Business Development Strategy	Complete	5 Years
PX664		08/16/2024	CC-003934	Trade Secret and Product Development; Internal User Data and Financial Information	Redact	10 Years
PX665		08/16/2024	CC-004003	Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
PX666		08/16/2024	CC-004004	Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
PX667		08/16/2024	CC-004005	Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
PX670		08/16/2024	CC-004008	Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
PX671		08/16/2024	CC-004009	Trade Secret and Product Development; Internal User Data and Financial Information; Business Development Strategy	Complete	10 Years
PX672		08/16/2024	CC-004010	Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years



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PX673		08/16/2024	CC-004011	Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
PX684		08/16/2024	CC-004022	Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
PX685		08/16/2024	CC-004023	Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
PX686		08/16/2024	CC-004024	Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
PX716		8/16/2024	CC-005144	Trade Secret and Product Development; Internal User Data and Financial Information	Redact	10 Years
PX719		9/6/2024	CC-005977	Trade Secret and Product Development; Business Development Strategy; Internal User Data and Financial Information	Redact	10 Years
PX720		9/6/2024	CC-005999	Trade Secret and Product Development; Internal User Data and Financial Information	Redact	10 Years
PX721		9/9/2024	CC-006000	Trade Secret and Product Development; Internal User Data and Financial Information	Redact	10 Years
PX722		9/9/2024	CC-006038	Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
PX723		9/9/2024	CC-006039	Trade Secret and Product Development; Internal User Data and Financial Information	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
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
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

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PX787		08/30/2029	CC-006302	Trade Secret and Product Development	Complete	10 Years
RX0024		11/29/2023	HRBD_FTC_00149156	Business Development Strategy	Complete	5 Years
RX0067		12/2023-4/2024	HRBD_FTC_00166632	Business Development Strategy; Internal User Data and Financial Information	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
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	Business Development Strategy	Complete	10 Years
RX0082		1/19/2024	HRBD_FTC_00149206	Business Development Strategy	Complete	10 Years
RX0084		12/8/2022		Trade Secret and Product Development	Complete	10 Years
RX0115		5/10/2024		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

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RX0119		6/28/2024		Internal User Data and Financial Information; Business Development Strategy	Complete	5 Years
RX0120		8/2/2024		Internal User Data and Financial Information; Business Development Strategy	Redact	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	Redact	5 Years
RX0125		Jul-24		Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0194		8/16/2024		Trade Secret and Product Development	Redact	10 Years
RX0195		8/16/2024		Trade Secret and Product Development	Complete	10 Years
RX0198		9/9/2024		Trade Secret and Product Development	Redact	10 Years
RX0200		6/11/2024		Trade Secret and Product Development	Redact	10 Years
RX0201		8/16/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Redact	10 Years
RX0204		8/16/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0205		8/16/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0207		9/9/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Redact	10 Years
RX0209		9/9/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0210		9/9/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0215		9/16/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Redact	10 Years

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RX0216		8/16/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0217				Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0227		9/18/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Redact	10 Years
RX0241		8/30/2024		Business Development Strategy	Complete	5 Years
RX0242		8/30/2024		Business Development Strategy	Complete	5 Years
RX0277		8/30/2024		Trade Secret and Product Development	Redact	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; Internal User Data and Financial Information	Complete	10 Years
RX0292		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years

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RX0293		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0294		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0295		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0296		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0297		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0298		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0299		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0300		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0301		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0302		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0303		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0304		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0305		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0306		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0307		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0308		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years

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RX0309		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0310		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0311		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0312		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0313		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0314		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0315		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0316		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0317		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0318		9/4/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0319		9/4/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0320		9/4/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0321		9/4/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0322		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0323		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0324		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years

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RX0325		9/3/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0380		8/27/2024		Trade Secret and Product Development; Internal User Data and Financial Information	Complete	10 Years
RX0405		2/5/2024	HRBD_FTC_00164124	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0406		2/15/2024	HRBD_FTC_00164125	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0407		2/29/2024	HRBD_FTC_00167019	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0408		2/29/2024	HRBD_FTC_00167030	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0409		2/29/2024	HRBD_FTC_00167031	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0410		2/29/2024	HRBD_FTC_00167032	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0411		2/29/2024	HRBD_FTC_00167034	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0412		2/29/2024	HRBD_FTC_00167035	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0413		2/29/2024	HRBD_FTC_00167036	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0414		3/7/2024	HRBD_FTC_00164188	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0415		3/14/2024	HRBD_FTC_00164207	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0416		3/14/2024	HRBD_FTC_00164209	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0417		3/14/2024	HRBD_FTC_00164210	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0418		3/14/2024	HRBD_FTC_00164211	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years

**PUBLIC**

RX0419		3/14/2024	HRBD_FTC_00164212	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0420		3/14/2024	HRBD_FTC_00164215	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0421		3/14/2024	HRBD_FTC_00164216	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0422		3/14/2024	HRBD_FTC_00164217	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0423		3/14/2024	HRBD_FTC_00164218	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0424		3/14/2024	HRBD_FTC_00164219	Business Development Strategy; Internal User Data and Financial Information	Complete	5 Years
RX0425		3/28/2024	HRBD_FTC_00167040	Personal Information; Business Development Strategy	Complete	Indefinite
RX0434			HRBD_FTC_00151943	Trade Secrets and Product Development; Business Development Strategy	Complete	10 Years
RX0435			HRBD_FTC_00153107	Trade Secrets and Product Development; Business Development Strategy	Complete	10 Years
RX0436			HRBD_FTC_00153256	Trade Secrets and Product Development; Business Development Strategy	Complete	10 Years
RX0437			HRBD_FTC_00153294	Trade Secrets and Product Development; Business Development Strategy	Complete	10 Years
RX0438			HRBD_FTC_00154001	Trade Secrets and Product Development; Business Development Strategy	Complete	10 Years
RX0439			HRBD_FTC_00154571	Trade Secrets and Product Development; Business Development Strategy	Complete	10 Years
RX0440			HRBD_FTC_00154806	Trade Secrets and Product Development; Business Development Strategy	Complete	10 Years
RX0441			HRBD_FTC_00155038	Trade Secrets and Product Development; Business Development Strategy	Complete	10 Years
RX0442			HRBD_FTC_00155126	Trade Secrets and Product Development; Business Development Strategy	Complete	10 Years
RX0443			HRBD_FTC_00155962	Trade Secrets and Product Development; Business Development Strategy	Complete	10 Years



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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