

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

05 02 2018
590603

In the Matter of
Tronox Limited
a corporation,

Docket No. 9377

A blue ink stamp that reads "ORIGINAL" in a stylized, slightly blurred font.

National Industrialization
Company (TASNEE)
a corporation,

The National Titanium Dioxide
Company Limited (Cristal)
a corporation, And

Cristal USA Inc.
a corporation.

RESPONDENT TRONOX LIMITED'S
MOTION FOR *IN CAMERA* TREATMENT OF TRIAL EXHIBITS

Tronox Limited (“Tronox”), by and through its undersigned counsel, respectfully moves pursuant to 16 C.F.R. § 3.45(b) and the scheduling order in this matter (as revised February 23, 2018) for *in camera* treatment of certain documents designated as trial exhibits by the parties to this case.

Complaint Counsel and Tronox (in conjunction with its co-respondents) have submitted their final proposed exhibit lists. Many of the documents produced by Tronox that appear on Respondents’ exhibit list or Complaint Counsel’s exhibit list contain confidential, competitively sensitive information. Rule 3.45(b) provides that a party may obtain *in camera* treatment for materials offered into evidence if “public disclosure will likely result in a clearly defined, serious injury.” Tronox, together with its counsel, has carefully reviewed all of the Tronox-produced documents that appear on the parties’ final exhibit lists. Tronox and its counsel have determined

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that the public disclosure of documents listed in Exhibit B will cause a clearly defined, serious injury to Tronox. For the reasons set forth below and in the Declaration of John Romano (Exhibit A), Tronox seeks *in camera* treatment for these confidential materials.

I. Legal Standard

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

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

In re Bristol-Myers Co., 90 FTC LEXIS 455, at *5-6 (Nov. 11, 1977).

II. Tronox’s Materials Meet the “Clearly Defined, Serious Injury Standard”

All six *Bristol-Myers* factors support Tronox’s motion for *in camera* treatment.

First, the information at issue is particular to Tronox’s business and is not known outside

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Tronox, with the exception of prices, which are known to customers and other parties involved in the sale process, like distributors. *See* Romano Decl. at ¶ 4.

Second, the information at issue is known only to a small group within Tronox. All of the information is generally shared only with those employees who must or should be aware of it in connection with their job duties, and never with more than a small fraction of Tronox's 3,500 employees. *See id.*

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

Fourth and most significantly, Tronox's competitors and customers would benefit at Tronox's expense from gaining access to these m i n }

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information at issue because it is drawn from Tronox's confidential files and cannot be replicated by any third party. *See id.* ¶¶ 6-13.

The Commission has recognized that competitively sensitive information related to

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discussing the category in the Romano Declaration, and the time period for which Tronox requests in camera treatment:

Type of Confidential Information	Declaration	Period
Customer-Specific Price and Volume Information	¶ 6	10 Years
Aggregated Price and Volume Information	¶ 7	5 Years
Information Regarding Price-Setting Processes	¶ 8	10 Years
Trade Secrets	¶ 9	Indefinite
Capacity, Production, and Inventory Information	¶ 10	10 Years
Business Plans	¶ 11	10 Years
Sensitive Personal Information	¶ 12	Indefinite

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

A. Customer-Specific Price and Volume Information

The first category of documents that should be granted *in camera* treatment is the category of documents that contain individual customer price and volume information, or other sensitive customer-specific bidding and negotiations information. Tronox does not publish prices and does not publicly reveal any customer-specific information related to prices, discounts, margins, or sales volumes. Romano Decl. ¶ 6. Since Tronox negotiates individual prices with each of its customers, individualized pricing data is among the most highly sensitive information that Tronox has produced. *Id.* If this confidential pricing and volume information is disclosed, Tronox’s customers

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could gain an unfair advantage during negotiations with Tronox, and Tronox's competitors could use it to unfairly take business from Tronox. *Id.*

Tronox strives to develop stable, long-term relationships with its customers, so prices paid by those customers relative to other customers tend to change only very gradually over time. Specific price and volume information can be used to infer relevant information about Tronox's current (and future) prices and commercial relationships. *Id.* Tronox requests that this highly sensitive information remain *in camera* for ten years. *See In the Matter of Impax Labs., Inc., A Corp., Respondent.*, 9373, 2017 WL 6033193, at *2 (MSNET Nov. 28, 2017) (granting *in camera* treatment for ten years over documents containing "data, methods and models from the National Prescription Audit database and/or the National Sales Perspectives database").

B. Aggregated Price and Volume Information

Tronox also has produced documents that aggregate information about price and volume which do not include customer-specific information. Romano Decl. ¶ 7. The release of information about Tronox's prices and volumes for a particular customer, industry, product, or

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types of competitive offers. *Id.* Since Tronox's negotiation strategies have not changed significantly, even information that is years old is sensitive because it would tend to reveal Tronox's current (and future) approach to price negotiations. *Id.* Given the highly sensitive nature of these documents, Tronox requests this information remain *in camera* for ten years. *See In the Matter of Impax Labs., Inc., A Corp., Respondent.*, 9373, 2017 WL 6033193, at *2 (MSNET Nov. 28, 2017) (granting *in camera*

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likely to increase or decrease prices, whether Tronox has the capacity to supply more TiO₂ to specific customers, or whether Tronox is likely to increase capacity or production in the future.

Id. Tronox requests that this information remain *in camera* for ten years. *See In re E.I. Dupont*

detailed cost data related to titanium dioxide production).

F. Business Plans

Tronox produced business planning documents, including strategic plans, budgets, and other forward-looking business plans, as well as certain non-public documents related to the synergies expected from the proposed combination with Cristal. Romano Decl. ¶ 11. The public release of these materials would harm Tronox because they revea

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§ 3.45(b)(3).

IV. Conclusion

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

May 1, 2018

/s/ Michael F. Williams, P.C.

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ATTORNEYS FOR TRONOX LIMITED

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EXHIBIT A

Exhibit A

Declaration of John Romano

1. My name is John D. Romano. I am the Senior Vice President and Chief Commercial Officer of Tronox Limited (“Tronox”).
2. I am responsible for supervising all of Tronox’s customer-facing activities, including sales, marketing, logistics, product development, and technical service. I also have knowledge of Tronox’s TiO₂ feedstock and pigment production activities. I have been employed by Tronox or its predecessors since 1987.
3. I am familiar with Tronox’s policies and procedures regarding the protection of confidential information, and I have personal knowledge of how the disclosure of various types of confidential information would harm Tronox.
4. In the ordinary course of business, Tronox keeps certain information strictly confidential and limits its distribution within the company to employees who must or should know it in connection with their job duties. For instance, customer-specific

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camera treatment because releasing them to the public would harm Tronox. Similarly, these categories cannot capture every possible type of sensitive information that should not be released to the public. I understand that Tronox'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.

14. This declaration draws upon the collective efforts of multiple people other than myself,

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EXHIBIT B

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested
PX0001	Business and Strategic Plans	10 Years
PX0003	Business and Strategic Plans	10 Years
PX0005	Business and Strategic Plans	10 Years
PX0006	Price-Setting; Capacity, Production, and Inventory Information	10 Years
PX0007	Business and Strategic Plans; Trade Secrets	Indefinite
PX0008	Business and Strategic Plans	10 Years
PX0010	Business and Strategic Plans	10 Years
PX0011	Business and Strategic Plans	10 Years
PX0012	Business and Strategic Plans	10 Years
PX0016	Business and Strategic Plans; Capacity, Production, and Inventory Information	10 Years
PX0017	Capacity, Production, and Inventory Information, Trade Secrets	Indefinite
PX0018	Business and Strategic Plans; Specific Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
PX0022	Price-Setting; Capacity, Production, and Inventory Information	10 Years
PX0023	Specific Price and Volume Information; Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
PX0025	Specific Price and Volume Information; Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
PX0027	Business and Strategic Plans	10 Years
PX0028	Aggregated Price and Volume Information; Capacity, Production and Inventory Information	10 Years
PX1015	Specific Price and Volume Information; Price-Setting; Business and Strategic Plans	10 Years
PX1016	Price-Setting; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1017	Specific Price and Volume Information;	10 Years
PX1018	Specific Price and Volume Information	10 Years
PX1021	Price-Setting	10 Years
PX1023	Specific Price and Volume Information	10 Years
PX1024	Business and Strategic Plans	10 Years
PX1025	Capacity, Production, and Inventory Information; Business and Strategic Plans; Aggregated Price and Volume Information	10 Years
PX1026	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
PX1028	Specific Price and Volume Information; Price-Setting	10 Years
PX1029	Business and Strategic Plans; Business and Strategic Plans	10 Years
PX1034	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1036	Business and Strategic Plans	10 Years
PX1037	Specific Price and Volume Information	10 Years
PX1038	Specific Price and Volume Information	10 Years
PX1039	Price-Setting	10 Years
PX1041	Specific Price and Volume Information	10 Years
PX1042	Specific Price and Volume Information	10 Years
PX1043	Specific Price and Volume Information	10 Years
PX1046	Aggregated Price and Volume Information	5 Years
PX1047	Price-Setting	10 Years
PX1048	Specific Price and Volume Information	10 Years
PX1056	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
PX1057	Aggregated Price and Volume Information	5 Years
PX1060	Business and Strategic Plans	10 Years
PX1062	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1065	Specific Price and Volume Information; Business and Strategic Plans	10 Years
PX1068	Specific Price and Volume Information	10 Years
PX1072	Business and Strategic Plans	10 Years
PX1073	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1074	Trade Secrets	Indefinite
PX1075	Business and Strategic Plans	10 Years
PX1076	Specific Price and Volume Information	10 Years
PX1077	Specific Price and Volume Information	10 Years
PX1079	Business and Strategic Plans	10 Years
PX1083	Capacity, Production, and Inventory Information	10 Years
PX1085	Specific Price and Volume Information	10 Years
PX1086	Specific Price and Volume Information	10 Years
PX1087	Price-Setting	10 Years
PX1088	Specific Price and Volume Information	10 Years
PX1089	Specific Price and Volume Information	10 Years
PX1090	Price-Setting	10 Years
PX1091	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1093	Specific Price and Volume Information	10 Years
PX1094	Business and Strategic Plans	10 Years
PX1095	Specific Price and Volume Information; Price-Setting	10 Years

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested
PX1193	Aggregated Price and Volume Information; Business and Strategic Plans; Specific Price and Volume Information	10 Years
PX1195	Specific Price and Volume Information; Aggregated Price and Volume Information	10 Years
PX1196	Business and Strategic Plans	10 Years
PX1199	Specific Price and Volume Information	10 Years
PX1200	Specific Price and Volume Information; Business and Strategic Plans	10 Years
PX1201	Aggregated Price and Volume Information; Specific Price and Volume Information	10 Years
PX1202	Aggregated Price and Volume Information	5 Years
PX1204	Aggregated Price and Volume Information	5 Years
PX1205	Specific Price and Volume Information	10 Years
PX1206	Aggregated Price and Volume Information	5 Years
PX1209	Specific Price and Volume Information	10 Years
PX1210	Specific Price and Volume Information; Capacity, Producti	

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested
PX1295	Aggregated Price and Volume Information	5 Years
PX1297	Specific Price and Volume Information	10 Years
PX1299	Price-Setting	10 Years
PX1300	Specific Price and Volume Information	10 Years
PX1301	Specific Price and Volume Information; Price-Setting	10 Years
PX1302	Specific Price and Volume Information	10 Years
PX1303	Specific Price and Volume Information; Business and Strategic Plans	10 Years
PX1304	Specific Price and Volume Information	10 Years
PX1305	Specific Price and Volume Information; Business and Strategic Plans	10 Years
PX1306	Capacity, Production, and Inventory Information	10 Years
PX1307	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
PX1308	Specific Price and Volume Information	10 Years
PX1309	Specific Price and Volume Information	10 Years
PX1310	Specific Price and Volume Information; Price-Setting	10 Years
PX1311	Price-Setting; Aggregated Price and Volume Information	10 Years
PX1312	Specific Price and Volume Information	10 Years
PX1313	Aggregated Price and Volume Information; Specific Price and Volume Information	10 Years
PX1314	Specific Price and Volume Information	10 Years
PX1315	Specific Price and Volume Information	10 Years
PX1316	Specific Price and Volume Information	10 Years
PX1317	Specific Price and Volume Information; Aggregated Price and Volume Information	10 Years
PX1318	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
PX1319	Specific Price and Volume Information	10 Years
PX1320	Specific Price and Volume Information	10 Years
PX1321	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1322	Business and Strategic Plans	10 Years
PX1324	Aggregated Price and Volume Information; Specific Price and Volume Information; Business and Strategic Plans	10 Years
PX1326	Specific Price and Volume Information; Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
PX1328	Trade Secrets; Business and Strategic Plans	Indefinite
PX1330	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
PX1332	Specific Price and Volume Information	10 Years
PX1333	Business and Strategic Plans	10 Years
PX1334	Capacity, Production, and Inventory Information	10 Years
PX1335	Capacity, Production, and Inventory Information	10 Years
PX1336	Capacity, Production, and Inventory Information	10 Years
PX1339	Capacity, Production, and Inventory Information	10 Years
PX1340	Capacity, Production, and Inventory Information	10 Years
PX1343	Specific Price and Volume Information	10 Years
PX1344	Business and Strategic Plans	10 Years
PX1345	Specific Price and Volume Information	10 Years
PX1347	Aggregated Price and Volume Information	5 Years
PX1348	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1349	Aggregated Price and Volume Information	5 Years
PX1350	Business and Strategic Plans	10 Years
PX1351	Specific Price and Volume Information; Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1352	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1353	Specific Price and Volume Information; Price-Setting	10 Years
PX1355	Specific Price and Volume Information; Specific Price and Volume Information; Business and Strategic Plans	10 Years
PX1356	Business and Strategic Plans	10 Years
PX1358	Specific Price and Volume Information	10 Years
PX1359	Business and Strategic Plans	10 Years
PX1360	Price-Setting; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1362	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1363	Specific Price and Volume Information	10 Years
PX1364	Specific Price and Volume Information; Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1365	Specific Price and Volume Information	10 Years
PX1366	Specific Price and Volume Information; Aggregated Price and Volume Information	10 Years
PX1367	Specific Price and Volume Information	10 Years
PX1368	Specific Price and Volume Information	10 Years
PX1369	Trade Secrets	Indefinite
PX1370	Aggregated Price and Volume Information; Business and Strategic Plans	10 YearsPXs
PX1352	Aggregated Price and Volume Information	PXs

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested
PX1371	Specific Price and Volume Information; Price-Setting	10 Years
PX1372	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1374	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1375	Specific Price and Volume Information; Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
PX1376	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1377	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1378	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
PX1379	Business and Strategic Plans	10 Years
PX1380	Business and Strategic Plans	10 Years
PX1381	Trade Secrets; Capacity, Production, and Inventory Information; Business and Strategic Plans	Indefinite
PX1382	Capacity, Production, and Inventory Information	10 Years
PX1383	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1384	Business and Strategic Plans	10 Years
PX1385	Aggregated Price and Volume Information	5 Years
PX1387	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1388	Business and Strategic Plans	10 Years
PX1389	Business and Strategic Plans	10 Years
PX1390	Business and Strategic Plans	10 Years
PX1391	Price-Setting; Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1393	Business and Strategic Plans	10 Years
PX1394	Capacity, Production, and Inventory Information	10 Years
PX1396	Price-Setting; Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1398	Business and Strategic Plans	10 Years
PX1399	Aggregated Price and Volume Information; Specific Price and Volume Information; Business and Strategic Plans	10 Years
PX1401	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1403	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1404	Specific Price and Volume Information	10 Years
PX1405	Business and Strategic Plans	10 Years
PX1409	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
PX1411	Business and Strategic Plans	10 Years
PX1413	Price-Setting	10 Years
PX1414	Business and Strategic Plans	10 Years
PX1415	Business and Strategic Plans	10 Years
PX1416	Business and Strategic Plans	10 Years
PX1418	Business and Strategic Plans	10 Years
PX1419	Business and Strategic Plans	10 Years
PX1420	Specific Price and Volume Information	10 Years
PX1422	Business and Strategic Plans	10 Years
PX1423	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1424	Business and Strategic Plans	10 Years
PX1425	Aggregated Price and Volume Information; Capacity, Production and Inventory Information; Trade Secrets	Indefinite
PX1426	Business and Strategic Plans	10 Years
PX1427	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1428	Specific Price and Volume Information	10 Years
PX1429	Specific Price and Volume Information	10 Years
PX1430	Specific Price and Volume Information	10 Years
PX1431	Specific Price and Volume Information	10 Years
PX1432	Specific Price and Volume Information	10 Years
PX1433	Specific Price and Volume Information	10 Years
PX1434	Specific Price and Volume Information	10 Years
PX1435	Capacity, Production, and Inventory Information	10 Years
PX1436	Aggregated Price and Volume Information; Specific Price and Volume Information	10 Years
PX1437	Business and Strategic Plans	10 Years
PX1438	Business and Strategic Plans	10 Years
PX1439	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1440	Business and Strategic Plans	10 Years
PX1441	Specific Price and Volume Information; Aggregated Price and Volume Information	10 Years
PX1443	Business and Strategic Plans	10 Years
PX1444	Specific Price and Volume Information	10 Years
PX1445	Specific Price and Volume Information	10 Years
PX1446	Specific Price and Volume Information; Aggregated Price and Volume Information	10 Years

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested
PX1673	Business and Strategic Plans	10 Years
PX1675	Capacity, Production, and Inventory Information	10 Years
PX1678	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
PX1679	Capacity, Production, and Inventory Information	10 Years
PX1681	Business and Strategic Plans	10 Years
PX1682		

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested
RX0162; PX7050	Aggregated Price and Volume Information; Specific Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
RX0180; PX7001	Price-Setting; Specific Price and Volume Information; Business and Strategic Plans	10 Years
RX0181; PX7005	Price-Setting; Specific Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0184; PX7007	Price-Setting; Aggregated Price and Volume Information; Specific Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0190	Business and Strategic Plans; Aggregated and Price and Volume Information	10 Years
RX0191	Business and Strategic Plans	10 Years
RX0201	Business and Strategic Plans; Price-Setting; Aggregated and Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
RX0202	Business and Strategic Plans; Capacity, Production and Inventory Information	10 Years
RX0220	Price-Setting; Capacity, Production, and Inventory Information	10 Years
RX0221	Business and Strategic Plans; Specific Price and Volume Information; Capacity Production, and Inventory Information	10 Years
RX0233	Specific Price and Volume Information	10 Years
RX0234	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX0235	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
RX0236	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0238	Specific Price and Volume Information	10 Years
RX0239	Specific Price and Volume Information	10 Years
RX0240	Business and Strategic Plans	10 Years
RX0242	Capacity, Production, and Inventory Information	10 Years
RX0243	Business and Strategic Plans	10 Years
RX0244	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0245	Capacity, Production, and Inventory Information	10 Years
RX0246	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0247	Highly Sensitive; Sensitive; Specific Price and Volume Information; Specific Price and Volume Information; Business and Strategic Plans	10 Years
RX0248	Price-Setting; Specific Price and Volume Information	10 Years
RX0249	Specific Price and Volume Information; Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX0250	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
RX0254	Specific Price and Volume Information; Business and Strategic Plans	10 Years
RX0255, PX1236	Business and Strategic Plans	10 Years
RX0256	Business and Strategic Plans	10 Years
RX0260	Business and Strategic Plans	10 Years
RX0261	Specific Price and Volume Information	10 Years
RX0262	Business and Strategic Plans	10 Years
RX0263	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0264	Business and Strategic Plans	10 Years
RX0265	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0266	Business and Strategic Plans	10 Years
RX0267	Trade Secrets	Indefinite
RX0268	Business and Strategic Plans	10 Years
RX0269	Business and Strategic Plans	10 Years
RX0270	Specific Price and Volume Information	10 Years
RX0271	Specific Price and Volume Information	10 Years
RX0272	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX0273	Aggregated Price and Volume Information; Specific Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
RX0274	Aggregated Price and Volume Information	5 Years
RX0275	Price-Setting; Specific Price and Volume Information	10 Years
RX0276	Specific Price and Volume Information	10 Years
RX0278	Specific Price and Volume Information	10 Years
RX0279	Specific Price and Volume Information	10 Years
RX0280	Specific Price and Volume Information	10 Years
RX0281	Specific Price and Volume Information	10 Years
RX0282	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX0285	Specific Price and Volume Information	10 Years
RX0286	Capacity, Production, and Inventory Information	10 Years
RX0287	Specific Price and Volume Information	10 Years
RX0288	Highly Sensitive	10 Years
RX0289	Specific Price and Volume Information	10 Years

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested
RX0290	Business and Strategic Plans	10 Years
RX0292/ PX1290	Aggregated Price and Volume Information; Capacityityu	10 Years

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested
RX0357	Specific Price and Volume Information	10 Years
RX0358	Specific Price and Volume Information	10 Years
RX0359	Highly Sensitive	10 Years
RX0360	Business and Strategic Plans	10 Years
RX0361	Specific Price and Volume Information	10 Years
RX0362	Specific Price and Volume Information	10 Years
RX0363	Specific Price and Volume Information	10 Years
RX0364	Specific Price and Volume Information; Business and Strategic Plans	10 Years
RX0365	Specific Price and Volume Information; Business and Strategic Plans	10 Years
RX0366	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX0367	Business and Strategic Plans	10 Years
RX0368	Aggregated Price and Volume Information	5 Years
RX0369	Aggregated Price and Volume Information; Specific Price and Volume Information	10 Years
RX0370	Specific Price and Volume Information	10 Years
RX0373	Specific Price and Volume Information	10 Years
RX0374	Specific Price and Volume Information	10 Years
RX0375	Business and Strategic Plans	10 Years
RX0376	Trade Secrets; Business and Strategic Plans	Indefinite
RX0379	Business and Strategic Plans	10 Years
RX0381	Aggregated Price and Volume Information	5 Years
RX0382	Specific Price and Volume Information; Price-Setting	10 Years
RX0383	Specific Price and Volume Information	10 Years
RX0384	Specific Price and Volume Information	10 Years
RX0386	Specific Price and Volume Information	10 Years
RX0387	Highly Sensitive	10 Years
RX0388	Specific Price and Volume Information	10 Years
RX0389	Specific Price and Volume Information	10 Years
RX0391	Specific Price and Volume Information	10 Years
RX0392	Specific Price and Volume Information	10 Years
RX0393	Specific Price and Volume Information; Business and Strategic Plans	10 Years
RX0394	Specific Price and Volume Information; Price-Setting	10 Years
RX0395	Aggregated Price and Volume Information	5 Years
RX0396	Aggregated Price and Volume Information	5 Years
RX0397	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX0398	Specific Price and Volume Information	10 Years
RX0399	Aggregated Price and Volume Information	5 Years
RX0400	Aggregated Price and Volume Information; Specific Price and Volume Information	10 Years
RX0401	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX0402	Specific Price and Volume Information	10 Years
RX0403	Specific Price and Volume Information	10 Years
RX0404	Specific Price and Volume Information	10 Years
RX0405	Specific Price and Volume Information	10 Years
RX0406	Specific Price and Volume Information	10 Years
RX0407	Specific Price and Volume Information	10 Years
RX0408	Specific Price and Volume Information	10 Years
RX0409	Specific Price and Volume Information	10 Years
RX0410	Specific Price and Volume Information; Price-Setting	10 Years
RX0411	Specific Price and Volume Information	10 Years
RX0412	Specific Price and Volume Information	10 Years
RX0413	Specific Price and Volume Information	10 Years
RX0414	Specific Price and Volume Information	10 Years
RX0415	Specific Price and Volume Information; Price-Setting	10 Years
RX0416	Business and Strategic Plans	10 Years
RX0417	Sensitive	10 Years
RX0418	Specific Price and Volume Information	10 Years
RX0419	Aggregated Price and Volume Information	5 Years
RX0420	Specific Price and Volume Information	10 Years
RX0421	Specific Price and Volume Information	10 Years
RX0422	Specific Price and Volume Information	10 Years
RX0423	Price-Setting; Specific Price and Volume Information	10 Years
RX0424	Specific Price and Volume Information	10 Years
RX0425	Specific Price and Volume Information	10 Years
RX0427	Aggregated Price and Volume Information	5 Years
RX0428	Specific Price and Volume Information	10 Years
RX0429	Capacity, Production, and Inventory Information	10 Years
RX0430	Specific Price and Volume Information	10 Years
RX0431	Specific Price and Volume Information	10 Years
RX0432	Specific Price and Volume Information	10 Years
RX0433	Specific Price and Volume Information	10 Years

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested
RX0434	Price-Setting; Specific Price and Volume Information; Business and Strategic Plans	10 Years
RX0435	Specific Price and Volume Information	10 Years
RX0437	Capacity, Production, and Inventory Information	10 Years
RX0438	Specific Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
RX0439	Specific Price and Volume Information	10 Years
RX0440	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0442	Specific Price and Volume Information	10 Years
RX0443	Specific Price and Volume Information	10 Years
RX0445	Price-Setting; Specific Price and Volume Information	10 Years
RX0446	Specific Price and Volume Information	10 Years
RX0447	Specific Price and Volume Information	10 Years
RX0448	Specific Price and Volume Information	10 Years
RX0449	Specific Price and Volume Information	10 Years
RX0450	Specific Price and Volume Information; Price-Setting	10 Years
RX0451	Specific Price and Volume Information; Price-Setting	10 Years
RX0452	Specific Price and Volume Information	10 Years
RX0453	Specific Price and Volume Information	10 Years
RX0454	Specific Price and Volume Information	10 Years
RX0456	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0457	Capacity, Production, and Inventory Information	10 Years
RX0458	Capacity, Production, and Inventory Information	10 Years
RX0459	Specific Price and Volume Information	10 Years
RX0460	Specific Price and Volume Information	10 Years
RX0461	Specific Price and Volume Information	10 Years
RX0462	Aggregated Price and Volume Information; Specific Price and Volume Information	10 Years
RX0463	Specific Price and Volume Information	10 Years
RX0464	Specific Price and Volume Information	10 Years
RX0465	Specific Price and Volume Information	10 Years
RX0466	Specific Price and Volume Information	10 Years
RX0467	Price-Setting	10 Years
RX0468	Specific Price and Volume Information	10 Years
RX0470	Specific Price and Volume Information	10 Years
RX0471	Specific Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
RX0472	Specific Price and Volume Information	10 Years
RX0473	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0474	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0475	Specific Price and Volume Information	10 Years
RX0476	Specific Price and Volume Information; Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0478	Capacity, Production, and Inventory Information	10 Years
RX0479	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0480	Business and Strategic Plans	10 Years
RX0481	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0483	Business and Strategic Plans	10 Years
RX0484	Specific Price and Volume Information	10 Years
RX0485	Specific Price and Volume Information	10 Years
RX0486	Specific Price and Volume Information	10 Years
RX0487	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX0488	Specific Price and Volume Information	10 Years
RX0489	Price-Setting; Aggregated Price and Volume Information	10 Years
RX0490	Specific Price and Volume Information; Price-Setting	10 Years
RX0491	Specific Price and Volume Information	10 Years
RX0492	Specific Price and Volume Information	10 Years
RX0493	Specific Price and Volume Information	10 Years
RX0494	Specific Price and Volume Information	10 Years
RX0495	Specific Price and Volume Information	10 Years
RX0496	Price-Setting; Specific Price and Volume Information	10 Years
RX0497	Specific Price and Volume Information	10 Years
RX0498	Specific Price and Volume Information	10 Years
RX0499	Specific Price and Volume Information	10 Years
RX0500	Business and Strategic Plans	10 Years
RX0501	Specific Price and Volume Information; Business and Strategic Plans	10 Years
RX0502	Business and Strategic Plans	10 Years
RX0503	Business and Strategic Plans	10 Years
RX0504	Specific Price and Volume Information	10 Years
RX0505	Capacity, Production, and Inventory Information	10 Years

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested
RX0506	Specific Price and Volume Information	10 Years
RX0507	Specific Price and Volume Information	10 Years
RX0508	Specific Price and Volume Information	10 Years
RX0510	Capacity, Production, and Inventory Information	10 Years
RX0511	Business and Strategic Plans	10 Years
RX0512	Capacity, Production, and Inventory Information	10 Years
RX0513	Capacity, Production, and Inventory Information	10 Years
RX0514	Capacity, Production, and Inventory Information	10 Years
RX0515	Price-Setting; Business and Strategic Plans	10 Years
RX0516	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
RX0517	Capacity, Production, and Inventory Information	10 Years
RX0518	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0519	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0520	Business and Strategic Plans	10 Years
RX0521	Capacity, Production, and Inventory Information	10 Years
RX0522	Capacity, Production, and Inventory Information	10 Years
RX0523	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0524	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0525	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0526	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0527	Business and Strategic Plans	10 Years
RX0528	Specific Price and Volume Information	10 Years
RX0530	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
RX0531	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0532	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0533	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0534	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX0535	Capacity, Production, and Inventory Information	10 Years
RX0537	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0538	Business and Strategic Plans	10 Years
RX0539	Business and Strategic Plans	10 Years
RX0540	Business and Strategic Plans	10 Years
RX0541	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX0542	Trade Secrets; Capacity, Production, and Inventory Information; Business and Strategic Plans	Indefinite
RX0543	Aggregated Price and Volume Information; Specific Price and Volume Information	10 Years
RX0544	Business and Strategic Plans	10 Years
RX0545	Specific Price and Volume Information	10 Years
RX0546	Specific Price and Volume Information; Business and Strategic Plans	10 Years
RX0547	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0548	Business and Strategic Plans	10 Years
RX0549	Business and Strategic Plans	10 Years
RX0550; PX1414	Business and Strategic Plans	10 Years
RX0552	Business and Strategic Plans	10 Years
RX0553	Business and Strategic Plans	10 Years
RX0554	Business and Strategic Plans	10 Years
RX0555	Business and Strategic Plans	10 Years
RX0556	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0557; PX1560	Business and Strategic Plans	10 Years
RX0558	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX0561	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0562	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0563	Aggregated Price and Volume Information	5 Years
RX0564	Business and Strategic Plans	10 Years
RX0567	Business and Strategic Plans	10 Years
RX0570	Other - Please Explain	10 Years
RX0575	Business and Strategic Plans	10 Years
RX0583	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0584	Business and Strategic Plans	10 Years
RX0585	Capacity, Production, and Inventory Information	10 Years
RX0586	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX0587	Business and Strategic Plans	10 Years
RX0588	Business and Strategic Plans	10 Years
RX0589	Specific Price and Volume Information	10 Years
RX0590	Specific Price and Volume Information	10 Years
RX0591	Specific Price and Volume Information	10 Years

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested
RX0612	Specific Price and Volume Information; Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
RX0637	Business and Strategic Plans	10 Years
RX0638	Business and Strategic Plans	10 Years
RX0719	Business and Strategic Plans; Specific Price and Volume Information; Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
RX0727; PX1000	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
	Business and Strategic Plans; Price-Setting; Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	
RX0730		10 Years
RX0887	Price-Setting	10 Years
RX0897	Business and Strategic Plans	10 Years
RX0901	Business and Strategic Plans	10 Years
RX0902	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0903	Capacity, Production, and Inventory Information	10 Years
RX0905	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX0906	Business and Strategic Plans	10 Years
RX0907	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0910	Aggregated Price and Volume Information	5 Years
RX0911; PX1418	Business and Strategic Plans	10 Years
RX0979	Business and Strategic Plans	10 Years
RX0981	Business and Strategic Plans	10 Years
RX0982	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0983	Aggregated Price and Volume Information	5 Years
RX0985	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0987	Business and Strategic Plans	10 Years
RX0988	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX0989	Business and Strategic Plans	10 Years
RX0991	Business and Strategic Plans	10 Years
RX0992	Capacity, Production, and Inventory Information	10 Years
RX0993	Aggregated Price and Volume Information	5 Years
RX0994	Specific Price and Volume Information	10 Years
RX0996	Aggregated Price and Volume Information	5 Years
RX0997	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	10 Years
RX0998	Aggregated Price and Volume Information	5 Years
RX0999	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	
RX1000		10 Years
RX1001	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1003	Specific Price and Volume Information; Specific Price and Volume Information	10 Years
	Aggregated Price and Volume Information; Capacity, Production, and Inventory Information; Business and Strategic Plans	
RX1004		10 Years
RX1006	Trade Secrets	Indefinite
RX1007	Specific Price and Volume Information	10 Years
RX1008	Specific Price and Volume Information	10 Years
RX1010	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX1011	Business and Strategic Plans	10 Years
RX1012	Business and Strategic Plans; Trade Secrets	Indefinite
RX1016	Specific Price and Volume Information; Aggregated Price and Volume Information	10 Years
RX1017	Aggregated Price and Volume Information	5 Years
RX1018	Aggregated Price and Volume Information; Business and Strategic Plans	10 Years
RX1041	Business and Strategic Plans	10 Years
RX1042	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1046	Business and Strategic Plans	10 Years
RX1047	Business and Strategic Plans	10 Years
RX1048	Business and Strategic Plans	10 Years
RX1056	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1057	Business and Strategic Plans	10 Years
RX1058	Business and Strategic Plans	10 Years
RX1059	Business and Strategic Plans	10 Years
RX1061	Business and Strategic Plans	10 Years
RX1062	Business and Strategic Plans	10 Years
RX1094	Trade Secrets; Aggregated Price and Volume Information; Capacity, Production, and Inventory Information	Indefinite
RX1095	Specific Price and Volume Information	10 Years
RX1097	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information	10 Years
RX1121	Business and Strategic Plans	10 Years

RX/PX	Confidentiality Category	Duration of In Camera Treatment Requested
RX1122	Business and Strategic Plans	10 Years
RX1123	Business and Strategic Plans	10 Years
RX1124	Business and Strategic Plans	10 Years
RX1125	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1126	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1127	Aggregated price/cost/margin info	10 Years
RX1128	Specific Price and Volume Information	10 Years
RX1129	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1130	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1131	Aggregated price/cost/margin info	10 Years
RX1132	Aggregated price/cost/margin info	10 Years
RX1134	Aggregated price/cost/margin info	10 Years
RX1135	Aggregated price/cost/margin info	10 Years
RX1136	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information	10 Years
RX1137	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information	10 Years
RX1138	Capacity, Production, and Inventory Information	10 Years
RX1139	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1140	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1141	Specific Price and Volume Information	10 Years
RX1142	Specific Price and Volume Information	10 Years
RX1143	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1144	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information	10 Years
RX1145	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information	10 Years
RX1146	Aggregated Price and Volume Information	5 Years
RX1147	Aggregated price/cost/margin info	10 Years
RX1148	Aggregated price/cost/margin info	10 Years
RX1149	Aggregated Price and Volume Information	5 Years
RX1150	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1151	Business and Strategic Plans	10 Years
RX1152	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1153	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1154	Business and Strategic Plans	10 Years
RX1155	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1156	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1157	Business and Strategic Plans	10 Years
RX1158	Specific Price and Volume Information; Price Setting	10 Years
RX1159	Specific Price and Volume Information	10 Years
RX1160	Specific Price and Volume Information; Price Setting; Trade Secrets	Indefinite
RX1161	Aggregated price/cost/margin info; Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1162	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1163	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1164	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1165	Business and Strategic Plans	10 Years
RX1166	Business and Strategic Plans	10 Years
RX1167	Specific Price and Volume Information; Trade Secrets	Indefinite
RX1216	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years
RX1252	Specific Price and Volume Information	10 Years
RX1551	Capacity, Production, and Inventory Information; Business and Strategic Plans	10 Years

Notice of Electronic Service

I hereby certify that on May 01, 2018, I filed an electronic copy of the foregoing Tronox Motion for In Camera Treatment of Trial Exhibits, with:

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Chief Administrative Law Judge
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Washington, DC, 20580

Donald Clark
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I hereby certify that on May 01, 2018, I served via E-Service an electronic copy of the foregoing Tronox Motion for In Camera Treatment of Trial Exhibits, upon:

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