

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



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**In the Matter of**

**Tronox Limited**  
a corporation,

**National Industrialization Company**  
(TASNEE)  
a corporation,

**Docket No. 9377**

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

**And**

**Cristal USA Inc.**  
a corporation.

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**RESPONDENTS NATIONAL INDUSTRIALIZATION COMPANY, THE NATIONAL  
TITANIUM DIOXIDE COMPANY LIMITED, AND CRISTAL USA INC.'S  
SUPPLEMENTAL MOTION FOR *IN CAMERA* TREATMENT OF TRIAL EXHIBITS**

National Industrialization Company (TASNEE), the National Titanium Dioxide Company Limited, and Cristal USA Inc. (collectively, “Cristal”) respectfully request that this Court grant *in camera* treatment pursuant to 16 C.F.R. § 3.45(b) to certain proposed trial exhibits that were not included in Cristal’s initial motion for *in camera* treatment and its first supplemental motion for *in camera* treatment.

The legal standard and confidentiality categories described in Cristal’s initial May 1, 2018 motion for *in camera* treatment apply equally here. The Court granted that motion in its entirety without objection from Complaint Counsel. *See* Order on Respondent Cristal’s Motion for *In Camera* Treatment, May 15, 2018 (“May 15 Order”). The Court also granted Cristal’s first supplemental motion for *in camera* treatment after Cristal agreed with Complaint Counsel to a

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partial redaction of one document. *See* Order on Respondent Cristal’s Supplemental Motion for *In Camera* Treatment, May 30, 2018 (“May 30 Order”). Accordingly, Cristal incorporates by reference its initial motion and supporting declaration.

Cristal is filing this supplemental motion to request *in camera* treatment of four exhibits—all created within the last three years—that were inadvertently excluded from Cristal’s initial motion and first supplemental motion. PX2121 contains information related to Cristal’s confidential business plans with respect to its Jazan slagging facility, inventory figures for the slagging, and Cristal’s confidential capital expenditure plans for another Cristal manufacturing facility, among other sensitive information, the disclosure of which would “likely result in a clearly defined, serious injury” to Cristal. 16 C.F.R. § 3.45(b). Likewise, the disclosure of the remaining three exhibits would also likely result in a clearly defined, serious injury to Cristal, as

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Cristal respectfully moves that its second supplemental motion for *in camera* treatment be granted.

Dated: June 5, 2018

Respectfully submitted,

/s/ Katherine E. Clemons

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DIOXIDE COMPANY LIMITED (CRISTAL),  
AND CRISTAL USA INC**

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**And**

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a corporation.

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**[PROPOSED] ORDER**

Upon consideration of National Industrialization Company (TASNEE), the National Titanium Dioxide Company Limited, and Cristal USA Inc.'s Supplemental Motion For *In Camera* Treatment Of Trial Exhibits, it is HEREBY ORDERED that *in camera* treatment is granted: (1) for a period of five years regarding PX2121, PX2137, and PX2244; and (2) for a period of ten years regarding PX2199.

ORDERED:

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

Date:



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Notice of Electronic Service

**I hereby certify that on June 05, 2018, I filed an electronic copy of the foregoing Cristal Respondents Second Supplemental Motion for In Camera Treatment, with:**

D. Michael Chappell  
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600 Pennsylvania Ave., NW  
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**I hereby certify that on June 05, 2018, I served via E-Service an electronic copy of the foregoing Cristal Respondents Second Supplemental Motion for In Camera Treatment, upon:**

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**I hereby certify that on June 05, 2018, I served via other means, as provided in 4.4(b) of the foregoing Cristal Respondents Second Supplemental Motion for In Camera Treatment, upon:**

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