



ATTACHMENT A

For the purpose of protecting the interests of the respondents and other parties in the above-captioned matter, grants immunity and disclosure of confidential information submitted or produced in connection with this matter:

IT IS HEREBY ORDERED THAT the Protective Order Governing Confidential Material ("Protective Order" shall govern the handling of Confidential Material, as hereafter defined.

1. As used in this Order, "confidential material" shall refer to any document or information thereof that contains privileged, competitively sensitive information, or sensitive personal information. Sensitive personal information shall refer to an individual's Social Security number, driver's license number, credit card or debit card number, driver's license number, date of birth (other than year), and any company, health information identifiable by individual, such as an individual's medical records. "Document" shall refer to any discoverable writing, recording, transcript or oral testimony, or electronically stored information in the possession, custody or control of the party, its employees, agents, attorneys, and all other persons acting on its behalf, excluding persons retained as consultants for the purpose of this proceeding.

2. Any document or portion thereof submitted by a respondent or a third party in connection with a Federal Trade Commission investigation or during the course of this proceeding that is entitled to be confidentially under the Federal Trade Commission Act or applicable regulation interpretation, or procedure, as well as any information taken from any portion of such document, shall be treated as confidential material for purposes of this Order. Such confidential material shall also be treated as confidential material under this Order where the submitter has requested such confidential treatment.

3. The parties and any third parties, in complying with informal discovery requests, disclosure requirements or discovery, shall not designate any responsive document or portion thereof as confidential material, including documents obtained by third parties pursuant to any subpoena or any other legal process.

4. The parties, in conducting discovery from third parties, shall provide to each third party a copy of this Order so as to maintain each such party's confidentiality herein.

5. A designation of confidentiality shall constitute a representation in good faith and after careful determination that the material is not reasonably believed to be already in the public domain and that counsel believes the material is designated confidential material as defined in Paragraph 1 of this Order.



