

In the Matter of)
)
 CHICAGO BRIDGE & IRON COMPANY)
)
 a foreign corporation,)
)
 CHICAGO BRIDGE & IRON COMPANY)
)
 a corporation)
)
 and)
)
 PITT-DES MOINES, INC.)
)
 a corporation)
)

Docket No. 9300

Agreed Motion for In Camera Treatment of Pat Outtrim's

Iron Company, N.V., Chicago Bridge & Iron Company, and Pitt-Des Moines, Inc. parties in the above referenced cause, along counsel for the witness Pat Outtrim, president of Project Technical Liaison Associates, Inc. ("PTLA") and would show this Honorable Court as follows:

1. In light of this Court's Protective Order Governing Discovery Material, Pat Outtrim's deposition of June 4, 2002, (exhibit CX 508) was marked "RESTRICTED CONFIDENTIAL, ATTORNEY EYES ONLY." The parties intend to use portions of Ms. Outtrim's deposition testimony at trial. However, Ms. Outtrim is prevented from disclosing many items of her testimony due to the confidentiality agreements she signed as president of PTLA with

2. Therefore, pursuant to 16 CFR Section 3.45, the parties request that the Court provide in camera treatment for the deposition transcript pages noted in Exhibit A, attached hereto and made a part hereof for all purposes. The statement of reasons for such in camera treatment also is noted in Exhibit A.

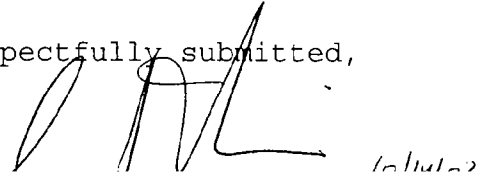
The parties pray that the Court grant this motion to allow for in camera treatment of portions of Pat Outtrim's deposition testimony, and for all other just and equitable relief as may be

Dated: _____, 2002.

Respectfully submitted,




Respectfully submitted,



Attorney at Law
4902 Yarwell
Houston, Texas 77096
(713) 721-5052
Attorney for Pat Outtrim

WINSTON S. STRAWN
35 West Wacker Drive
Chicago, IL 60601
(312) 558-7545

Respectfully submitted,



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Lisa A. Rosenthal
Cecelia Waldeck

601 Pennsylvania Ave., N.W.
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ptla2.lit/100802

UNITED STATE OF AMERICA
BEFORE FEDERAL TRADE COMMISSION

In the Matter of)
)
CHICAGO BRIDGE & IRON COMPANY N.V.)
)
a foreign corporation,)
)
CHICAGO BRIDGE & IRON COMPANY)
)
a corporation)
)
and)
)
PITT-DES MOINES, INC.)
)
a corporation)
)

Docket No. 9300

Agreed Order for In Camera Treatment of Portions of Pat Outtrim's
Deposition Testimony

This Court has read and considered the Agreed Motion for In
Camera Treatment of Pat Outtrim's Deposition Testimony, and finds
that many items of her testimony should not be made public due to
the confidentiality agreements she signed as president of

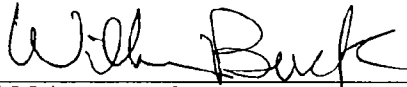
and potential clients.

The Court being of the opinion that said motion should be
granted, it is therefore, ORDERED, ADJUDGED AND DECREED that the
pages of Pat Outtrim's deposition of June 4, 2002, (exhibit CX
508) which are noted on the attached Exhibit A, shall be given in
camera treatment pursuant to 16 CFR Section 3.45 by this Court
and all parties.

Signed this ___ day of _____, 2002.

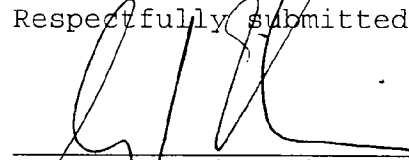
Administrative Judge Presiding

Respectfully submitted,



William Buck
Attorney at Law
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Houston, Texas 77096
(713) 721-5052
Attorney for Pat Outtrim

Respectfully submitted,



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Cecelia Waldeck
Michael A. Franchak
Hector Ruiz
Commission Counsel
Federal Trade Commission
601 Pennsylvania Ave., N.W.
Washington, D.C. 20500

ptla3.lit/100802

Exhibit A

2	pgs	Client: "C	Client in I	son for Confidentiality
4	pgs	Client: "C	Client in I	"
0	pgs	Client: "C	Client in I	"
	pg 4	Client: "C	Client in I	" Some Information Protected by Attorney - Client Privilege.
	pg 5	Client: "C	Client in I	"
	pg 6	Client: "C	Client in I	"
7	pgs	Client: "C	Client in I	"
	pg 6	Client: "C	Client in I	"
	pg 6	Client: "C	Client in I	"
5	pgs	Client: "C	Client in I	"
0	pgs	Client: "C	Client in I	"
3	pgs	Client: "C	Client in I	"
	pg 7	Client: "C	Client in I	"
	pg 7	Client: "C	Client in I	"
	pg 8	Client: "C	Client in I	"
	pg	Informa	Client in I	Company.
119	pgs	Client: "C	Client in I	"
131	pgs	Client: "C	Client in I	"
148	pgs	Informa	Client in I	Company. PTL Client: "Confidentiality Agreement in Place".
155	pgs	Client: "C	Client in I	"
171	pgs	Client: "C	Client in I	"
174	pgs	Client: "C	Client in I	"
	pg 7	Client: "C	Client in I	"
185	pgs	Client: "C	Client in I	"
193	pgs	Client: "C	Client in I	"

2	F	Client: "C	Client in I
4	F	Client: "C	Client in I
0	F	Client: "C	Client in I
	F	Client: "C	Client in I
	F	Client: "C	Client in I
	F	Client: "C	Client in I
7	F	Client: "C	Client in I
	F	Client: "C	Client in I
	F	Client: "C	Client in I
5	F	Client: "C	Client in I
0	F	Client: "C	Client in I
3	F	Client: "C	Client in I
	F	Client: "C	Client in I
	F	Client: "C	Client in I
	F	Client: "C	Client in I
	F	Informa	Client in I
119	F	Client: "C	Client in I
131	F	Client: "C	Client in I
148	F	Informa	Client in I
155	F	Client: "C	Client in I
171	F	Client: "C	Client in I
174	F	Client: "C	Client in I
	F	Client: "C	Client in I
185	F	Client: "C	Client in I
193	F	Client: "C	Client in I

DVD Backup:/Inact
CBI dispute



CERTIFICATE OF SERVICE

I, April Tabor, hereby certify that on the 15th day of October 2002, I served true and correct copies of this Agreed Motion for In Camera Treatment of Pat Outtrim's Deposition Testimony and of this Agreed Order for In Camera Treatment of Portions of Pat Outtrim's Deposition Testimony by hand delivery upon:

- (1) The Honorable D. Michael Chappell
Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

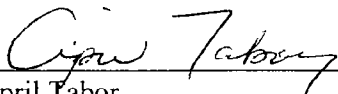
And by facsimile and U.S. mail upon:

- (2) William Buck, Esquire
4902 Yarwell
Houston, TX 77096

Counsel for Third Party Project Technical Liaison Associates, Inc.

- (3) Greg J. Miarecki
Winston & Strawn
35 West Wacker Drive
Chicago, IL 60601-9703

Counsel for respondents.



April Tabor