

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION



CHICAGO BRIDGE & IRON COMPANY N.V.
a foreign corporation,

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III.

Complaint Counsel created new charts and graphs after the record was closed and included them in post trial pleadings. These new charts and graphs are equivalent to unlabeled

post trial exhibits, irrespective of whether they are referred to as "pedagogical aids" or otherwise. A proper pedagogical aid would be a demonstrative exhibit, which, to be considered against an opposing party, must be offered into evidence after a proper foundation has been laid and

admitted into evidence before the record closes. Complaint Counsel's use of charts and graphs

