

[PUBLIC]

UNITED STATES OF AMERICA



... review approximately 10% of the produced documents to assist in ...

Argument and Authorities

The terms of the protective order worked adequately for discovery purposes, but now that the case has moved closer to the time when NTSD will need to respond to particular documents

significance of many documents², Respondent requests that the protective order be modified to

allow only Respondent's personal Dr. Keran Van Wagoner to have limited access to specific

categories of documents

almost all data is given a confidentiality designation, regardless of the time period it covers or the


regions it concerns. In fact, even blinded data connecting NTSD to other groups is designated

16. Confidentiality: revealing the contents to others, or using the

17. Confidentiality: revealing the contents to others, or using the

limited access to specified categories of documents in order to assist in the preparation of NTSP's

Respectfully submitted,



CERTIFICATE OF SERVICE

I, Gregory D. Binns, hereby certify that on March 9, 2004, I caused a copy of the foregoing to be served upon the following persons:

Federal Trade Commission
Northeast Region
One Bowling Green, Suite 318
New York, NY 10004

Deborah Anderson (via certified mail)

Compte Rendu de la Commission de la Santé et de la Sécurité