

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

In the Matter of)	
)	
CHICAGO BRIDGE & IRON COMPANY N.V.)	Corrected Public Version
a foreign corporation,)	
)	
CHICAGO BRIDGE & IRON COMPANY)	Docket No. 9300
a corporation,)	
)	
PITT-DES MOINES, INC.,)	
a corporation.)	
)	

AFFIDAVIT OF RICHARD E. GOODRICH

1. I am Executive Vice President and Chief Financial Officer of Chicago Bridge & Iron Company N.V. ("CB&I").

2. In 2004, CB&I [

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3. At the time CB&I submitted these materials to the FTC, it designated them as highly confidential and requested that the FTC destroy or return the materials to CB&I [

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4. [

]

5. [

] CB&I

considers [] its voluntary submission of materials to the FTC as highly confidential and extremely sensitive business information, the release or publication of which would substantially harm CB&I's business.

6. To CB&I's knowledge, no one outside of CB&I, aside from certain individuals at the FTC [] at the time or knows about it now.

7. Only a small number of high level executives at CB&I were ever privy to any information concerning [] This information constitutes a highly confidential executive level strategy, and I would not casually discuss it even within CB&I.

8. CB&I has taken, and continues to take, all due precautions to safeguard the confidential nature of this information.

9. Information concerning [] is of great value to CB&I because it concerns []

10. CB&I expended a significant amount of effort and money pursuing []

11. Information concerning [] is the type of information that cannot be duplicated outside of CB&I and which CB&I will not allow anyone outside of its business to obtain.

12. CB&I is particularly concerned that the release of this information would disadvantage CB&I with respect to its competitors because it would give competitors inside information concerning [

] In addition, CB&I voluntarily contacted the FTC and provided information to the FTC with the understanding that its contacts and information would be held confidential and not publicly disclosed, especially in an unrelated matter.