

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION



a foreign corporation,

)

that the Commission would not disclose such material to the public without first

Respondent's Response to Complaint [REDACTED]

Subsequently, on June 20, 2005, Complaint Counsel filed its Response to CB&I

Respondent's Further Briefing on Specific Remedy Issues [REDACTED]

Respondent's Complaint Counsel's Response [REDACTED]

on July 12, 2005, Complaint Counsel confirmed to Respondents that Complaint Counsel did not object to *in camera* treatment of the material designated as confidential in Respondents' Further Briefing.

Out of an abundance of caution, Respondents file this Motion for *In Camera* Treatment at Complaint Counsel's suggestion to ensure that materials Respondents previously designated as confidential are afforded *in camera* treatment by the Commission.²

II.

THE MATERIAL AT ISSUE MEETS THE LEGAL STANDARD FOR *IN*

**CAMERA TREATMENT – PUBLIC DISCLOSURE OF THE INFORMATION
WOULD RESULT IN A CLEARLY DEFINED, SERIOUS INJURY TO CB&I**

The material in question concerns CB&I's alternative proposal for a divestiture

package consistent with the Commission's findings. The material is

III.
THE MATERIAL AT ISSUE SHOULD BE KEPT
IN CAMERA FOR A PERIOD OF FIVE YEARS

such treatment must be determined. See 16 C.F.R. § 3.45(b). For the reasons stated in

the First *In Camera* Motion, CD&I requests that it be held in camera for a period of five years.

CERTIFICATE OF SERVICE

I, Jeffrey J. VanHooreweshe, hereby certify that on July 21, 2005, true