

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

_____)
In the Matter of)
)
McWANE INC)

Docket No. 0351

_____)
a corporation, and)
STAR PIPE PRODUCTS, LTD.,)
a limited partnership.)
_____)

PUBLIC DOCUMENT

agreed to further negotiate the scope of the requests to reach a compromise. This motion is filed

as a protective measure to preserve Thornburg's rights in light of the applicable time limitations.

3. Thornburg generally objects to the subpoena and states that it is insufficient in that it fails to make a showing that the materials sought are generally or reasonably relevant. See 16 C.F.R. § 3.34(b) (2009). Moreover, the subpoena should not be enforced because

notwithstanding the protective order, it provides inadequate protection because the requests

require disclosure of Thornburg's private and confidential information.

for David Allen Barnette

David Allen Barnette
Vivian H. Basdekis
JACKSON KELLY, PLLC
P.O. Box 553
Charleston, WV 25322
Tel: (304) 340-1327
Fax: (304) 340-1272
Email: dbarnette@jacksonkelly.com
vhbasdekis@jacksonkelly.com

CERTIFICATE OF SERVICE

I certify that on March 20, 2012, I filed the foregoing document electronically in PDF format using the FTC's E-Filing System, which will send notification of such filing to:

Donald S. Clark, Secretary
Federal Trade Commission
600 Pennsylvania Avenue NW, Room H-113
Washington, DC 20580

I certify that on March 10, 2012, I caused to be served one copy via electronic mail

delivery and one copy via overnight mail delivery of the foregoing document upon:

The Honorable D. Michael Chappell
Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Avenue NW, Room H-106
Washington, DC 20580
oalj@ftc.gov

I certify that on March 20, 2012, I caused to be served one copy via electronic mail delivery and one copy via first-class mail delivery of the foregoing document upon:

Thomas Brock
U.S. Federal Trade Commission

Joseph A. Ostoyich
Andrea Stargard

Gregory S.C. Huffman
William Katz
Nicole Williams
Brian Stolz
Thompson and Knight LLP
One Arts Plaza, Suite 1500
1722 Routh Street
Dallas, TX 75201
(214) 969-1700