

UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

03 06 2018 589881

In the Matter of

BENCO DENTAL SUPPLY CO., a corporation,

Docket No. 9379

HENRY SCHEIN, INC., a corporation, and

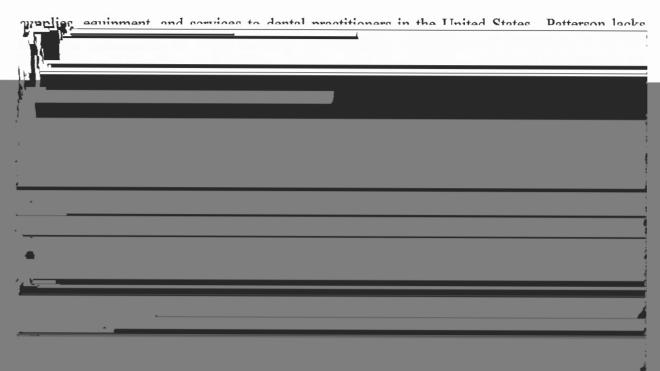
PUBLIC

PATTERSON COMPANIES, INC., a corporation.

ANSWER OF RESPONDENT PATTERSON COMPANIES, INC. TO THE FEDERAL TRADE COMMISSION'S ADMINISTRATIVE COMPLAINT

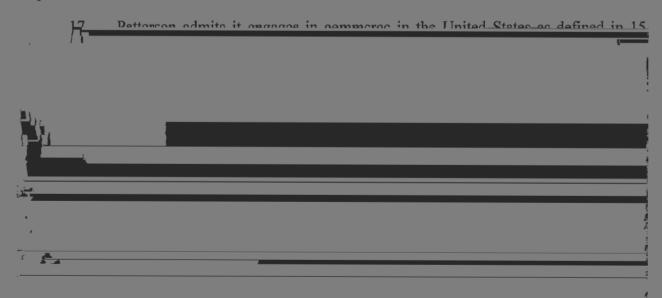
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| Patterson, thus n of Paragraph 4 of | f the C | onse is a complain | ıt. | ed. To the | | | erson | denies | the a | illegations |



sufficient information to admit or deny the remaining allegations of Paragraph 15 of the Complaint, and therefore denies them. To the extent the allegations are legal conclusions, no response is required.

16. Patterson admits it is a corporation as defined in 15 U.S.C. § 44, and lacks sufficient information to admit or deny the allegations of Paragraph 16 of the Complaint relating to other Respondents. To the extent the allegations are legal conclusions, no response is required.

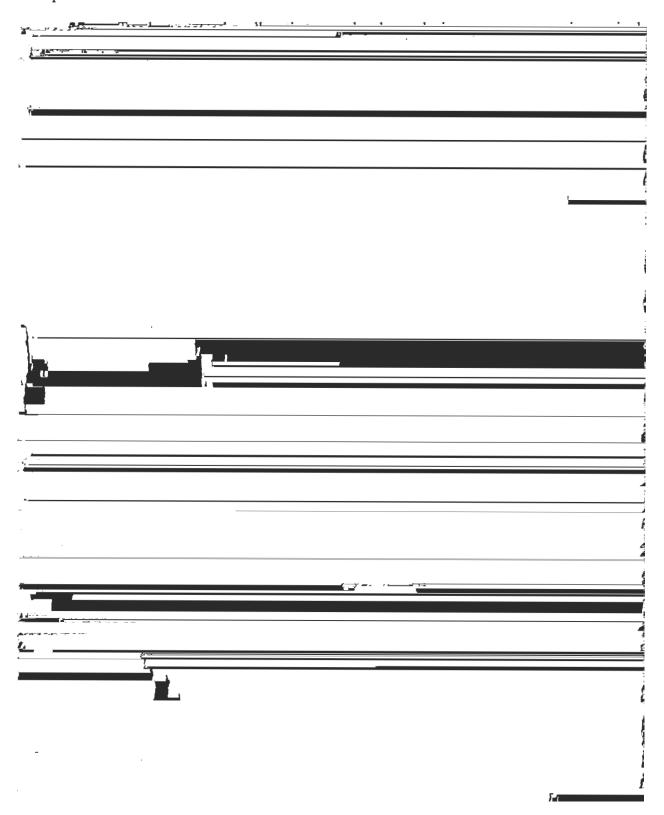


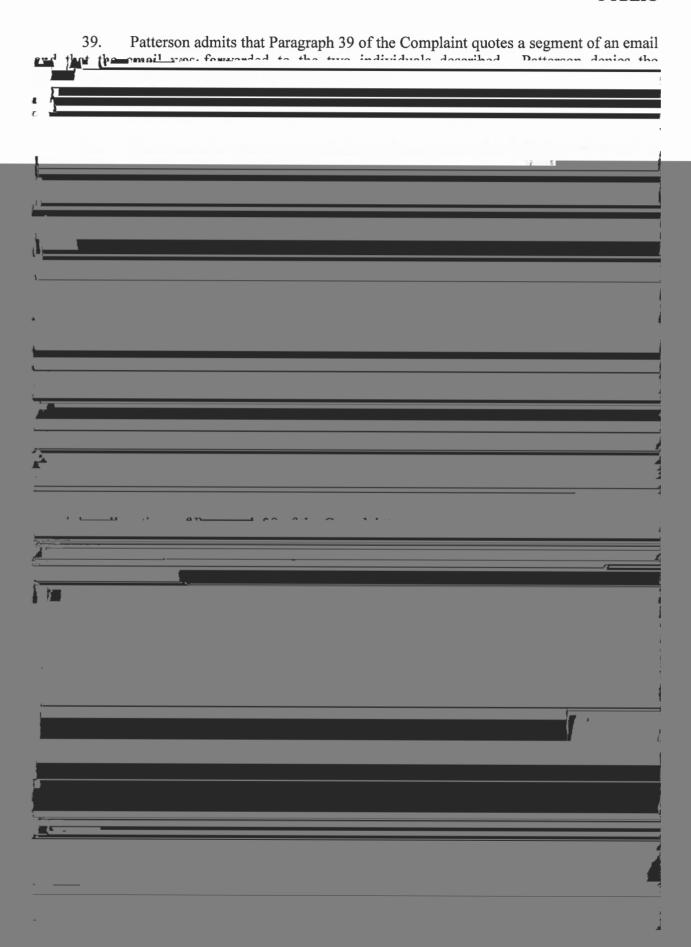
U.S.C. § 44, and lacks sufficient information to admit or deny the allegations of Paragraph 17 of the Complaint relating to other Respondents. To the extent the allegations are legal conclusions, no response is required.

18. Patterson admits the allegations contained in the second and third sentences of Paragraph 18 of the Complaint, and lacks knowledge sufficient to form a reasonable belief as to

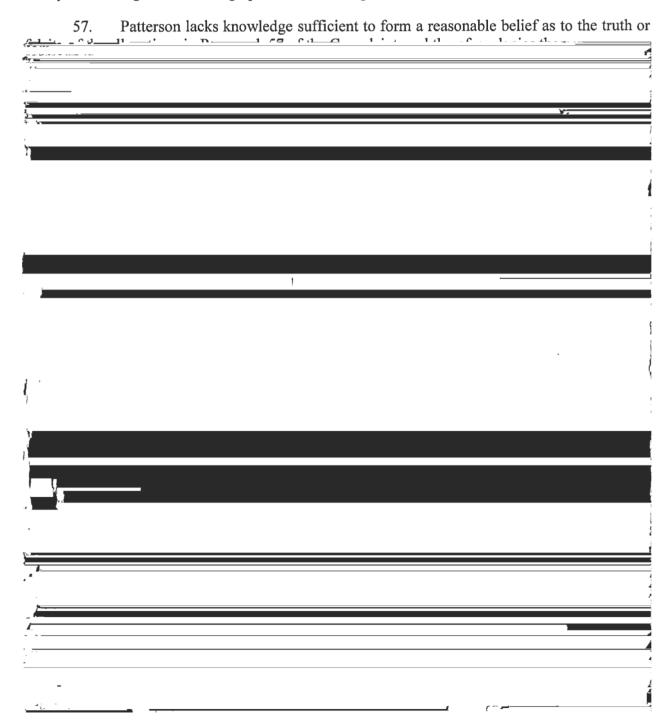
distributors do not provide the breadth of services available through Patterson, and denies the remaining allegations contained in Paragraph 25.

26. To the extent the allegations contained in Paragraph 26 of the Complaint are legal conclusions, no response is required. Patterson denies the allegations of Paragraph 26 of the Complaint.





- 53. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 53 of the Complaint, and therefore denies them.
- 54. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 54 of the Complaint, and therefore denies them.
- 55. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 55 of the Complaint, and therefore denies them.
- 56. Patterson lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the allegations in Paragraph 56 of the Complaint, and therefore denies them.

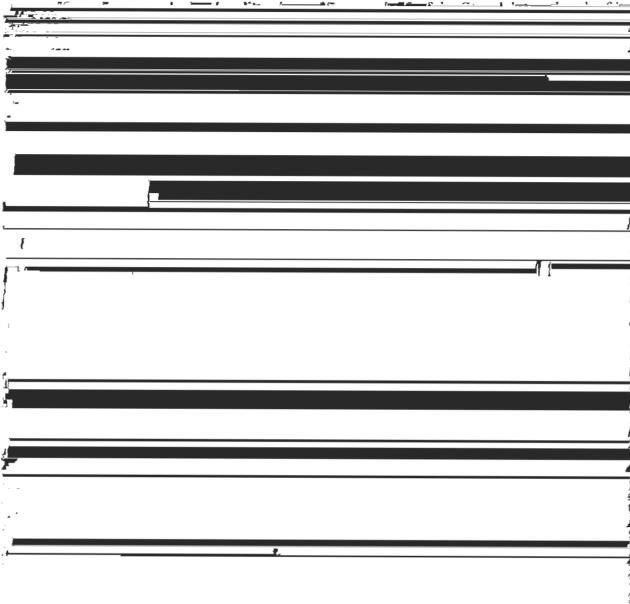


69. Patterson admits that in October 2013 the TDA launched a program called "TDA Perks Supplies" that was directly competitive with Patterson and utilized an online entity called SourceOne, which sources its products primarily from other distributors, and that TDA Perks Supplies represented that it would provide discounts to its members. Patterson denies that TDA Perks Supplies was a "buying group" under any definition that Patterson is aware of, and denies all remaining allegations contained in Paragraph 69 of the Complaint.



Patterson and lacks knowledge sufficient to form a reasonable belief as to the truth or falsity of the remaining allegations in Paragraph 70 of the Complaint, and therefore denies them.

- 71. Patterson denies the allegations of Paragraph 71 of the Complaint.
- (a) Patterson denies the allegations in contained in Paragraph 71(a) of the Complaint

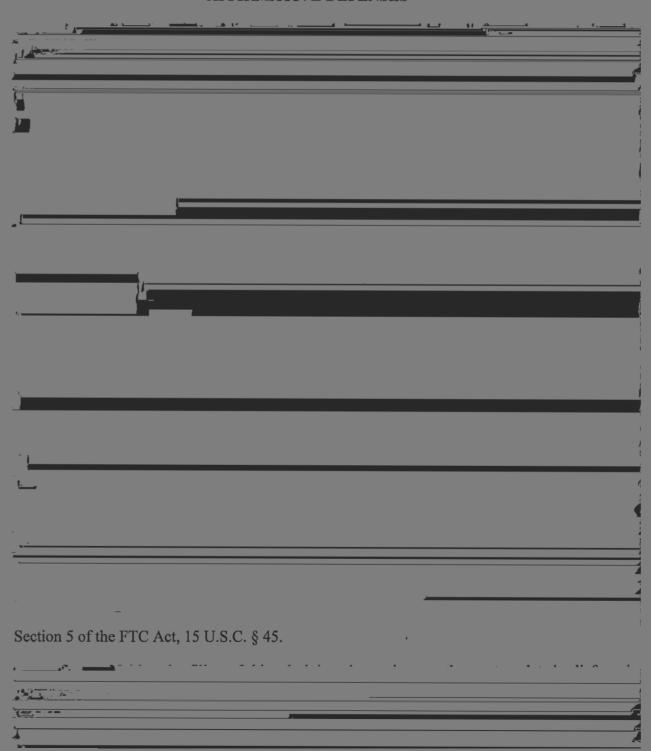


subparts. To the extent the allegations contained in Paragraph 75 of the Complaint are legal conclusions, no response is required.

76. Patterson denies the allegations of Paragraph 76 of the Complaint. To the extent

- 88. Patterson denies the allegations of Paragraph 88 of the Complaint. To the extent the allegations contained in Paragraph 88 of the Complaint are legal conclusions, no response is required.
- 89. The allegations of Paragraphs 89 and 90, and Count 4 of the Complaint, do not allege any conduct by Patterson and thus no response is required. To the extent a response is required, Patterson denies the allegations of Paragraphs 89 and 90 of the Complaint.

AFFIRMATIVE DEFENSES



CERTIFICATE OF SERVICE

| , | I | hereby | certify | that o | n March | 6, 201 | 8, I fi | led the | foregoing | document | electronically |
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The Honorable D. Michael Chappell
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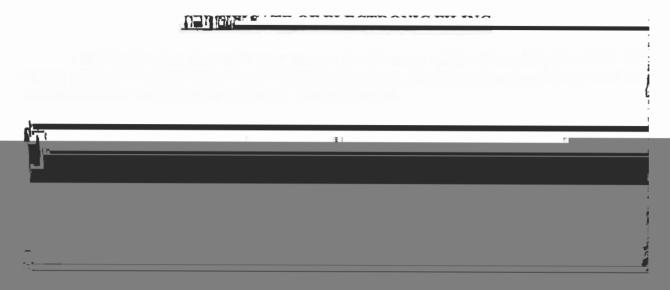
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Counsel for Respondent Henry Schein, Inc.





I certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the paper original and that I possess a paper original of the signed documents that are available for review by the parties and the adjudicator.

March 6, 2018

By: /s/ James J.
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