

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of

Tronox Limited
a corporation,

National Industrialization Company
(TASNEE)
a corporation,

Docket No. 9377

The National Titanium Dioxide
Company Limited (Cristal)
a corporation,

And

Cristal USA Inc.
a corporation.

**RESPONDENTS NATIONAL INDUSTRIALIZATION COMPANY, THE NATIONAL
TITANIUM DIOXIDE COMPANY LIMITED, AND CRISTAL USA INC.'S
MOTION FOR IN CAMERA TREATMENT OF PROPOSED TRIAL EXHIBITS**

and Attachment A to that declaration (the “Document List” and collectively “Cristal’s Confidential Documents”).

II. ARGUMENT

In camera treatment of documents offered into evidence is appropriate if “public disclosure will likely result in a clearly defined, serious injury to the . . . corporation requesting camera treatment or after finding that the material constitutes sensitive personal information.” 16 C.F.R. § 3.45(b). The person or entity requesting camera treatment can meet this standard by demonstrating that the documents are “sufficiently secret and sufficiently material to [Respondents’] business that disclosure would result in serious competitive injury.” In re Evanston Nw. Healthcare Corp., 2005 F.T.C. LEXIS 27, at *1 (Feb. 9, 2005). In re Bristol-Meyers Co., 90 F.T.C. 455, 456 (1977); In re Gen. Foods Corp., 95 F.T.C. 352, 355 (1980)). For documents more than three years old, the applicant “must also demonstrate, by affidavit or declaration, that such material remains sensitive.” In re 1-800 Contacts, Inc., 2017 FTC LEXIS 55, at *3 (Apr. 4, 2017).

In Bristol-Meyers the Commission outlined six factors the Court may consider in assessing documents sought to be kept in camera

- (1) the extent to which the information is known outside the applicant’s business;
- (2) the extent to which the information is known by employees and others involved in the applicant’s business;

(6) the ease or difficulty with which the information could be properly acquired or duplicated by others.

Bristol-Meyers 90 F.T.C. at 456-57.

Rule 3.45(b) also requires the applicant to specify the duration of camera treatment requested for each document. "In determining the length of time for which camera treatment is appropriate, . . . ordinary business records are granted less protection than trade secrets." Contact 2017 FTC LEXIS 55, at *5. Trade secrets include, *inter alia*, "secret formulas, processes, other secret technical information, or information that is privileged." [O]rdinary business records include information such as customer names, pricing to customers, business costs and profits, as well as business plans, marketing plans, or sales documents. *5-6. Business records meeting the standard for camera treatment are typically kept in camera for two to five years. *Id.*

A. Cristal's Confidential Documents Are Sufficiently Secret and Sensitive to Warrant in Camera Treatment

Cristal's Confidential Documents contain information going to the core of Cristal's competitive activity, and camera treatment is necessary to protect Cristal's confidential business strategies and analyses from public disclosure and use by Cristal's customers, suppliers, and competitors to Cristal's detriment. These documents contain information that could be used against Cristal in business negotiations, that would harm Cristal's reputation or otherwise damage customer relationships, that would give competitors an unfair advantage over Cristal, or that would facilitate competitors' attempts to replicate or frustrate Cristal's strategic initiatives. This information is kept highly confidential within Cristal. Stoll Dep. ¶¶ 11-13.

1. Confidential Financial Forecasts and Information, Customer-Specific Pricing, Product-Level Pricing, and Cost Information

prices, discounts, and price changes for specifically identified Cristal customers), product-level pricing information (details of prices or price changes charged or planned for TiO2 products), and cost information. The Commission has long recognized the substantial injury that can result from the disclosure of confidential financial information. See, e.g. In re SKF Indus. No. 9046C, 1977

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in camera treatment of ten years for a document containing a “highly unusual level of detailed cost data”).

2. Pricing Strategy, Customer Negotiations, and Internal Customer Strategy

The documents noticed for potential use at trial include internal company presentations and communications that reflect Cristal’s confidential pricing strategy and customer negotiations, including internal strategy for customer negotiations. Stoll Decl. ¶¶ 56-57, 62-64. Public disclosure of these confidential customer and internal communications would harm Cristal by (i) damaging established customer relationships, (ii) giving customers a strategic advantage in negotiations, and (iii) providing competitors with a roadmap of Cristal’s pricing and sales process and an unfair insight into how Cristal competes for the business of specific customers. ¶¶ 58-60, 63-68. In addition, many of the documents in this category remain competitively sensitive for more than three years and require extended camera protection. Documents disclosing Cristal’s approach to competitive strategy and negotiations with customers, particularly similarly situated customers, are not stale. Three years is less time than most of Cristal’s customer relationships, and those relationships would be damaged if customer negotiation details from the past five years are revealed. ¶¶ 61, 69-71. As such, Cristal requests that pricing strategy documents and customer negotiations and related internal strategy documents older than three years be granted camera treatment for five years and that more recent documents in these categories be granted camera treatment for ten years.

3. Production and Product Allocation Decisions

The production decision and product allocation documents category consists of Cristal’s proprietary analyses of market dynamics, margins, input costs, customer trends and demands, and other sensitive strategic information going to the core of Cristal’s business, which types of products to produce, how much of each product to produce, at which manufacturing locations to produce said products, and which customers and distributors to prioritize as it negotiates and

delivers said productsd.

position in customer negotiations. ¶¶ 52-55. Cristal therefore requests that all of the documents in this category receive the same treatment for five years.

5. Technical and Trade Secret Information

Cristal's technical information documents consist of information regarding the technical specifications and capabilities of C3.7 (r1.9 (v)3.1 a)4.8.8 (t)-1.9 ()] TJ 'cattairin pl3.7 (nd4.9 (f

its ability to compete effectively against rivals. Stoll Decl. ¶¶ 93-98. These documents will remain sensitive for the foreseeable future. ¶ 98-99.

Indefinite in camera

Respectfully submitted,

/s/ Katherine E. Clemons

James L. Cooper
Peter J. Levitas
Ryan Z. Watts
Katherine E. Clemons
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Avenue, NW
Washington, D.C. 20001-3743
(202) 942-5000
(202) 942-5999 (facsimile)
james.cooper@apks.com
peter.levitas@apks.com
ryan.watts@apks.com

ATTORNEYS FOR NATIONAL
INDUSTRIALIZATION COMPANY
(TASNEE), THE NATIONAL TITANIUM
DIOXIDE COMPANY LIMITED (CRISTAL),
AND CRISTAL USA INC.

Matthew J. Reilly, P.C.
Michael F. Williams, P.C.

KIRKLAND & ELLIS LLP
655 Fifteenth Street, N.W.
Suite 1200
Washington, D.C. 20005
(202) 879-5000
(202) 879-5200 (facsimile)
michael.williams@kirkland.com
matt.reilly@kirkland.com

David J. Zott, P.C.

KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
(312) 862-2428
(312) 862-2200 (facsimile)
david.zott@kirkland.com

ATTORNEYS FOR TRONOX LIMITED

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this st

PUBLIC

dvote@ftc.gov
jnathan@ftc.gov
kcerilli@ftc.gov
rtovsky@ftc.gov
atabor@ftc.gov

Counsel Supporting the Complaint

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UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

Tronox Limited
a corporation,

National Industrialization Company
(TASNEE)
a corporation,

Docket No. 9377

The National Titanium Dioxide
Company Limited (Cristal)
a corporation,

And

Cristal USA Inc.
a corporation.

[PROPOSED] ORDER

Upon consideration of National Industrialization Company, the National Titanium Dioxide Company Limited, and Cristal USA Inc.'s Motion For In Camera Treatment of Proposed Trial Exhibits, it is HEREBY ORDERED that the proposed trial exhibits listed in Attachment A are to be provided in camera treatment for the time period indicated therein.

ORDERED:

D. Michael Chappell
Chief Administrative Law Judge

Date:

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EXHIBIT 1

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UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of

Tronox Limited
a corporation,

National Industrialization Company
(TASNEE)
a corporation,

Docket No. 9377

The National Titanium Dioxide Company
Limited (Cristal)
a corporation,

And

Cristal USA Inc.
a corporation.

DECLARATION OF MARK STOLL

I, Mark Stoll, based upon my personal knowledge concerning matters to which I am competent to testify, hereby declare as follows:

1. I am the General Manager of Mergers and Acquisitions of Cristal USA Inc.
2. I also work closely with Cristal USA Inc.'s corporate parents, National Industrialization Company ("TASNEE") and The National Titanium Dioxide Company Limited, and my role as General Manager of Mergers and Acquisitions is part of the TASNEE corporate structure.
3. Cristal USA Inc., TASNEE, and The National Titanium Dioxide Company Limited are Respondents in the above-captioned matter.
4. I am authorized to testify on behalf of all three of these Respondent entities (collectively, "Cristal") for purposes of this declaration regarding the contents, confidentiality, and materiality of Cristal documents proposed to be introduced at trial.

those documents remain competitively sensitive today. Finally, for each category of documents, I have included a description of why the duration of the treatment that Cristal is seeking is necessary to prevent future harm to Cristal's business interests.

10. Although many of these documents are ordinary business records, they contain information that Cristal has not distributed to the public, its customers, its competitors, its suppliers, or even all Cristal employees.

11. Cristal expends significant effort to maintain the confidentiality of this information except with respect to individual counterparties in negotiations and entities that have signed non-disclosure agreements. Even in these situations, the information Cristal shares is provided only on a need-to-know basis. The information in documents falling into these categories, as identified in the Document List, is not available to the public through other means.

12. Cristal has established procedures and policies to restrict this type of competitively sensitive information to management-level employees, Cristal employees who need access to the information in order to perform their job responsibilities, and the specific customers or suppliers with whom

position by putting Cristal on uneven footing with customers, suppliers, and competitors in its business dealings.

A. Category 1: Confidential Financial Information and Forecasts

15. The documents in this category contain the company's confidential financial information and forecasts, disclosure of which would reveal details about the workings of Cristal's business, its financial positions, and its competitive strengths and weaknesses, all of which could be used by customers, suppliers, and competitors to gain an advantage over Cristal in negotiations and in the marketplace.

16.

21. As such, while the documents themselves may be more than three years old, the information contained in those documents remains competitively sensitive, and disclosure of that information will harm Cristal as much and in the same way as disclosure of more recent documents.

B. Category 2: Customer-Specific Pricing Information

22. Cristal's pricing for TiO₂ products is customer-specific and not generally known outside the particular customer relationship. Cristal negotiates prices for each product on a customer-by-customer basis at arm's length based on a multitude of factors regarding

23. Documents in this category contain the specific pricing and, in some cases, contract terms

29. Only one document falling exclusively into this category is older than three years old:
PX2011.

30.

31.

32.

33.

34.

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36. The type of information contained in this category of documents is treated as highly confidential and proprietary within Cristal. The information is disseminated on a need-to-know basis within Cristal. This granular information is not disclosed outside of the company and its owners other than under an NDA for specific limited circumstances and, in particular, is not disclosed to Cristal's competitors.

37. If this information were to become public, Cristal would be significantly disadvantaged during negotiations with customers. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

38. Competitors could also use this information to undermine Cristal's competitiveness by utilizing Cristal's proprietary information to exploit its perceived weaknesses or adopt its successful strategies.

39. Because of the long-term customer relationships Cristal has built and the length of the TiO₂ business cycle, Cristal would continue to be harmed by release of this information over the next five years.

D. Category 4: Cost Information

40. Documents in this category include specific information about Cristal's costs, such as overhead and input cost information for Cristal's business and production facilities.

41. The type of information contained in this category of documents is treated as highly confidential and proprietary within Cristal. The information is disseminated on a need-to-know basis within Cristal. This granular information is not disclosed outside of the company and its owners other than under an NDA for specific limited circumstances and, in particular, is not disclosed to Cristal's competitors.

42. Customers receiving this information could use Cristal's costs to gain an advantage in negotiations, to Cristal's detriment.

43. Competitors could exploit this information in negotiations with Cristal's customers and could use it to identify and target areas where such information would permit the competitor to gain a competitive advantage over Cristal and focus resources on those areas.

44. Similarly, competitors could use such information to inform their own production decisions in ways that would be harmful to Cristal.

45.

59. Public disclosure would also harm Cristal's ability to compete effectively against rivals, who would seek to exploit their new-found knowledge of Cristal's pricing strategy and appropriate its methodology without having to expend the resources Cristal has put into developing it.

60. Competitors could also use this information to gain a strategic advantage in their own negotiations with customers.

61.

C. Category 7: Customer Negotiations and Internal Customer Strategy

62. Documents in this category contain information reflecting contract and sales negotiations with specific customers and Cristal's internal strategy with respect to those negotiations.

63. Customer relationship management is a critical part of Cristal's business. Public disclosure of these confidential customer and internal communications would harm Cristal by damaging established customer relationships, gp 1 108 455.64001 Tm (63l)-4 (y)orm (f)-55 (om)14.6s r .

75. Release of such documents would significantly lessen Cristal's abilities to compete in the marketplace in the following ways:

76.

89. Release of such documents would significantly lessen Cristal's abilities to compete in the marketplace. Cristal would lose competitive advantages it has developed and is working to develop with regard to its manufacturing processes and systems as well as product development and improvement.

90. Competitors will be able to unfairly appropriate Cristal's innovations and proprietary information. Competitors would be able to ascertain any weaknesses within Cristal's manufacturing systems and processes as well as in Cristal's products and unfairly exploit that confidential information to significantly lessen Cristal's competitiveness in the marketplace.

91. Cristal devotes significant resources to developing and refining its technical expertise and keeping the details of that expertise confidential. These details are trade secrets, and public disclosure of these trade secrets would diminish their value.

92. The details of the facilities and processes discussed in these documents do not change significantly over time, so it is important that Cristal be able to maintain the confidentiality of this information for the foreseeable future, for at least the next 17.2 (e)-2.8 (C TJ1 0 2.9 (a)-1.7 (dv)10.4 (a)-2.9 (nt)6.8 (a)-2.9

V. Category 12: Documents Produced Pursuant to Protective Orders in Federal Court Proceedings

104. I understand that certain documents on the exhibit lists were originally produced pursuant to or subject to protective orders in civil litigations in federal courts. Those documents are identified as Litigation Protective Order in the Document List.

VI. Conclusion

105.

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ATTACHMENT A

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
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PX0020; RX1173

2/5/2018

PX0020-001

PX0020-037

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2009	5/1/2017		CR2R-000234485	CR2R-000234487	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2011	4/5/2013		CR2R-000262988	CR2R-000262993	Customer-Specific Pricing Information		Indefinite (or, in the alternative, at least 10 years)
PX2014; RX0756	11/21/2016		CR2R-001578220	CR2R-001578448	Business Plans and Competitive Strategy; Cost Information		5 years
PX2016	4/3/2013		CR2R-001657616	CR2R-001657618	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2020	8/25/2016		CR2R-002371813	CR2R-002371814	Business Plans and Competitive Strategy		5 years
PX2021	5/25/2011		CR2R-000328563	CR2R-000328565	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2025	00/00/2017		CR2R-000781209	CR2R-000781209	Product-Level Pricing Information		5 years
PX2026	10/6/2017		CR2R-000794237	CR2R-000794237	Customer-Specific Pricing Information; Business Plans and Competitive Strategy		5 years
PX2027	9/14/2016		CR2R-001000051				

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2031	11/18/2015		CR2R-001969524	CR2R-001969593	Pricing Formulas/Models; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX2036	11/4/2011		CR2R-001813614	CR2R-001813616	Customer-Specific Pricing Information; Pricing Strategy		0 years
PX2038	8/29/2015		CR2R-006551755	CR2R-006551762	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		0 years
PX2039	9/9/2016		CR2R-000050431	CR2R-000050435	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		0 years
PX2041	8/19/2016		CR2R-000197278	CR2R-000197279	Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy		0 years
PX2042	9/23/2016		CR2R-000781208	CR2R-000781227	Product-Level Pricing Information; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		0 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
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Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2061	3/16/2017	[REDACTED]	CRI_SR0000001343	CRI_SR0000001359	Business Plans and Competitive Strategy	[REDACTED]	5 years
PX2062	5/12/2017	[REDACTED]	CRI_SR0000001313	CRI_SR0000001328	Business Plans and Competitive Strategy	[REDACTED]	5 years
PX2065	9/9/2013	[REDACTED]	CR2R-000296975	CR2R-000296976	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy	[REDACTED]	5 years
PX2068	7/17/2015	[REDACTED]	CR2R-000532792	CR2R-000532793	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy	[REDACTED]	10 years
PX2069	8/30/2016	[REDACTED]	CR2R-002533239	CR2R-002533242	Customer-Specific Pricing Information	[REDACTED]	5 years
PX2070	2/28/2012	[REDACTED]	CR2R-000317646	CR2R-000317650	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy	[REDACTED]	5 years
PX2077	11/24/2015	[REDACTED]	CR2R-001420053	CR2R-001420057	Pricing Strategy	[REDACTED]	5 years
PX2088	6/17/2014	[REDACTED]	CR2R-000288754	CR2R-000288764	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy	[REDACTED]	5 years
PX2089	9/1/2016	[REDACTED]	CR2R-000774681	CR2R-000774682	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy	[REDACTED]	10 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2110; RX0689	3/29/2017		CR2R-003151848	CR2R-003151850	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2112	6/8/2016		CR2R-003481215	CR2R-003481216	Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions		10 years
PX2113	1/20/2017		CR2R-005822092	CR2R-005822093	Pricing Strategy		5 years
PX2116; RX0734	8/23/2016		CR2R-005255428	CR2R-005255623	Customer-Specific Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2122	3/5/2017		CR2R-000561137	CR2R-000561141	Production and Product Allocation Decisions		10 years
PX2123	11/22/2016		CR2R-005247497	CR2R-005247517	Business Plans and Competitive Strategy		5 years
PX2124	3/20/2017		CR2R-000563218	CR2R-000563248	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2125	5/28/2017		CR2R-000563611	CR2R-000563616	Production and Product Allocation Decisions; Cost		

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document
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Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates
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Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2158	12/4/2015		CR2R-001735513	CR2R-001735517	Cost Information; Business Plans and Competitive Strategy		5 years
PX2162	7/15/2016		CR2R-003737613	CR2R-003737614	Business Plans and Competitive Strategy		5 years
PX2163	3/30/2016		CR2R-011855153	CR2R-011855158	Confidential Financial Information and Forecasts		
PX2164; RX0741	12/16/2016		CR2R-003738762	CR2R-003738819	Proprietary Technical Information		10 years
PX2165	5/26/2017		CR2R-002850635	CR2R-002850637	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information		10 years
PX2167	5/9/2016		CR2R-001671028	CR2R-001671029	Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2174	9/14/2017		CR2R-002461395	CR2R-002461398	Production and Product Allocation Decisions; Cost Information		10 years
PX2175	3/30/2017		CR2R-002836565	CR2R-002836576	Cost Information; Proprietary Technical Information		10 years
PX2177	12/22/2016		CR2R-006539196	CR2R-006539247	Production and Product Allocation Decisions; Cost Information		10 years
PX2178	9/19/2016		CR2R-006532779	CR2R-006532922	Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2179	04/00/2017		CRI_SR0000001434	CRI_SR0000001441	Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX2180	2/8/2017		CR2R-000569711	CR2R-000569739	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2181	6/9/2017		CR2R-000573780	CR2R-000573781	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2183	9/2/2016		CR2R-000595459	CR2R-000595464	Proprietary Technical Information		10 years
PX2184	5/24/2017		CR2R-000596605	CR2R-000596608	Sensitive Compensation and Benefits Information		5 years
PX2187	6/21/2017		CR2R-008126684	CR2R-008126688			

Cristal Confidential Documents

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Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2207	4/17/2017		CR2R-005147658	CR2R-005147717	Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX2208; RX0610	12/00/2016		CR2R-005986934	CR2R-005987017	Cost Information; Proprietary Technical Information		10 years
PX2209	12/3/2015		CR2R-004694271	CR2R-004694273	Business Plans and Competitive Strategy		5 years
PX2210	9/29/2015		CR2R-005414290	CR2R-005414374	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2211	5/10/2017		CR2R-002414676	CR2R-002414677	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2217	12/00/2016		CRI_SR0000001585	CRI_SR0000001590	Production and Product Allocation Decisions; Cost Information		10 years
PX2218	12/22/2014		CR2R-001073808	CR2R-001073810	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2219	9/15/2016		CR2R-000774485	CR2R-000774489	Cost Information; Business Plans and Competitive Strategy		5 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
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PX2220

9/7/2016

CR2R-000197723

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2246	8/19/2015		CR2R7G-000005474	CR2R7G-000005680	Customer-Specific Pricing Information; Litigation Protective Order		n Accordance with Protective Order
PX2247	2/18/2015		CR2R7G-000022383	CR2R7G-000022661	Product-Level Pricing Information; Litigation Protective Order		n Accordance with Protective Order
PX2248	8/3/2012		CR2R7G-000030929	CR2R7G-000030990	Litigation Protective Order		n Accordance with Protective Order
PX2249	10/18/2012		CR2R7G-000045905	CR2R7G-000045970	Litigation Protective Order		n Accordance with Protective Order
PX2250	7/17/2012		CR2R7G-000067725	CR2R7G-000067780	Pricing Strate2.5 (ip (c)-1.8 (ing35 ()ri)-1.8 (c)2.119 l)-1.8 (c)2.119 n4.5 (0)] 1.2 (t)8.5 (c)-4.5 (t)8.4 (iv)-9. (ing)-5.1 ()-3.5 ()e 528.2s1 (e)6.s/rmla 56.		

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2259	6/9/2016		CR2R-000110711	CR2R-000110713	Cost Information; Proprietary Technical Information		10 years
PX2262	1/30/2014		CR2R-000292951	CR2R-000292956	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2270	9/2/2014		CR2R-002663153	CR2R-002663155	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2271	5/18/2016		CR2R-003728694	CR2R-003728705	Business Plans and Competitive Strategy		5 years
PX2274	5/15/2015		CR2R-008089004	CR2R-008089005	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2275	9/29/2016		CR2R-000966866	CR2R-000966867			

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2293	2/16/2017		CR2R-004366850	CR2R-004366850	Business Plans and Competitive Strategy		5 years
PX2294	6/6/2017		CR2R-004375903	CR2R-004375904	Product-Level Pricing Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2295; RX0743	2/5/2017		CR2R-004367689	CR2R-004367690	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2299	8/1/2016		CR2R-000774978	CR2R-000774981			

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2310	7/28/2017		CRP3-000501244	CRP3-000501247	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2311	7/27/2017		CRP3-000501252	CRP3-000501257	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2312	10/18/2017		CRP3-000519313	CRP3-000519314	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2313	10/18/2017		CRP3-000519385	CRP3-000519386	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2314	10/25/2017		CRP3-000520804	CRP3-000520808	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2315; RX0735	5/18/2017		CR2R-011267074	CR2R-011267078	Pricing Formulas/Models; Customer-Specific Pricing Information		Indefinite (or, in the alternative, at least 10 years)
PX2316; RX0736	10/31/2017		CRP3-000521998	CRP3-000522000	Customer-Specific Pricing Information; Product-Level Pricing Information		5 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2340	3/6/2017		CR2R-006003947	CR2R-006003950	Business Plans and Competitive Strategy		5 years
PX2343	5/26/2016		CR2R-003742634	CR2R-003742640	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
PX2345	10/24/2017		CRP3-000535641	CRP3-000535652	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2346	11/2/2017		CRP3-000535428	CRP3-000535429	Business Plans and Competitive Strategy		5 years
PX2347	8/22/2017		CRP3-000535221	CRP3-000535224	Confidential Financial Information and Forecasts; Cost Information; Business Plans and Competitive Strategy		5 years
PX2356	10/1/2017		CRP3-000191352	CRP3-0000535gg-(e)] TJ	1 (P)58 539.28 I 375.35 (3)-1.1a.7 ming.1 (r)-7 ming.1	,3 (St)8.n5 (19.5 (ns)-2.9 (-)-3.5 (a)3.5 (nd)1.2 (-)-2(-)-3.5 (a)3.5 (nd)1.8) (-)-2.1 564s (535 .5 (

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2360	9/29/2017		CRP3-000191372	CRP3-000191385	Pricing Formulas/Models		Indefinite (or, in the alternative, at least 10 years)
PX2363	8/29/2017						

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2370	5/2/2017		CRP3-000531968	CRP3-000180011	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information		10 years
PX2371	12/6/2017		CRP3-000186409	CRP3-000186429	Cost Information; Proprietary Technical Information		10 years
PX2372	10/22/2017		CRP3-000189773	CRP3-000189778	Proprietary Technical Information		10 years
PX2373; RX0731	10/3/2017		CRP3-000191135	CRP3-000191207	Pricing Strategy; Business Plans and Competitive Strategy; Confidential Financial Information and Forecasts; Cost Information		5 years
PX2376	8/19/2017		CRP3-000227621	CRP3-000227626	Proprietary Technical Information		10 years
PX2377	10/12/2017		CRP3-000228672	CRP3-000228697	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2378; RX0866	10/13/2017		CRP3-000229060	CRP3-000229081	Cost Information; Proprietary Technical Information		10 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2380	11/6/2017		CRP3-000230909	CRP3-000230912	Proprietary Technical Information		10 years
PX2381	9/29/2017		CRP3-000241505	CRP3-000241508	Proprietary Technical Information		10 years
PX2382	10/12/2017		CRP3-000241724	CRP3-000241792	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2383	7/12/2017		CRP3-000505856	CRP3-000505899			

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2400	9/29/2017		CRP3-000233935	CRP3-000233938	Proprietary Technical Information		
PX2401	9/30/2017		CRP3-000234087	CRP3-000234124	Proprietary Technical Information		10 years
PX2402	10/3/2017		CRP3-000233965	CRP3-000233966	Proprietary Technical Information		10 years
PX2404	9/29/2017		CRP3-000233948	CRP3-000233952	Proprietary Technical Information		10 years
PX2406	10/6/2017		CRP3-000233391	CRP3-000233393	Cost Information; Proprietary Techn7		

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2411	11/1/2017		CRP3-000234619	CRP3-000234673	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2412	11/3/2017		CRP3-000230992	CRP3-000231001	Proprietary Technical Information		10 years
PX2413	11/6/2017		CRP3-000235112	CRP3-000235115	Proprietary Technical Information		10 years
PX2415	8/19/2017		CRP3-000238929	CRP3-000238935	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2416	9/18/2017		CRP3-000241916	CRP3-000241922	Proprietary Technical Information		10 years
PX2418	10/26/2017		CRP3-000234521	CRP3-000234527	Proprietary Technical Information		10 years
PX2420	8/19/2017		CRP3-000245057	CRP3-000245058	Production and Product Allocation Decisions		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2423	8/31/2017		CRP3-000244734	CRP3-000244735	Proprietary Technical Information		10 years
PX2425	9/29/2017		CRP3-000241505	CRP3-000241508	Proprietary Technical Information		10 years
PX2426	11/6/2017		CRP3-000230909	CRP3-000230912	Proprietary Technical Information		10 years
PX2427	11/6/2017		CRP3-000230926	CRP3-000230931	Proprietary Technical Information		10 years
PX2428	11/1/2017		CRP3-000552059	CRP3-000552063	Production and Product Allocation Decisions; Cost Information		10 years
PX2431	10/12/2017		CRP3-000237563	CRP3-000237631	Cost Information; Proprietary Technical Information		10 years
PX2433	11/18/2015		CR2R-001568001	CR2R-001568001	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions		10 years
PX2435	11/3/2015		CR2R-004014415	CR2R-004014415	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2438	5/7/2017		CR2R-006004150	CR2R-006004153	Sensitive Compensation and Benefits Information		5 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates
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Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2455	1/29/2016		CR2R-000787749	CR2R-000787751	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2456	11/18/2015		CR2R-000525575	CR2R-000525576	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations		

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2478	10/24/2017		CRP3-000553491	CRP3-000553492	Proprietary Technical Information		10 years
PX2479	10/25/2017		CRP3-000552828	CRP3-000552830	Production and Product Allocation Decisions		10 years
PX2480	12/28/2017		CRP3-000551415	CRP3-000551420	Proprietary Technical Information		10 years
PX2482	11/2/2017		CRP3-000552029	CRP3-000552035	Proprietary Technical Information		10 years
PX2484	10/14/2017		CRP3-000553281	CRP3-000553282	Production and Product Allocation Decisions: Cost		

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2490	12/20/2017		CRP3-000189745	CRP3-000189746	Production and Product Allocation Decisions; Cost Information		10 years
PX2492	1/4/2018		CRP3-000227455	CRP3-000227456	Production and Product Allocation Decisions; Cost Information		10 years
PX2493	9/4/2017		CRP3-000241242	CRP3-000241244	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2495	1/4/2018		CRP3-000531043	CRP3-000531048	Cost Information		5 years
PX2496	12/5/2017		CRP3-000569629	CRP3-000569631	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX5000; RX1063	4/6/2018		PX5000-001	PX5000-171	Product-Level Pricing Information; Business Plans and Competitive Strategy		5 years
PX5001; RX1064	4/6/2018		PX5001-001	PX5001-056	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX6000	12/16/2011		FTC-PROD-0073442	FTC-PROD-0073444	Pricing Strategy; Confidential Financial Information and Forecasts; Litigation Protective Order		5 years



Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6038	11/21/2002		FTC-PROD-0077226	FTC-PROD-0077228	Litigation Protective Order		In Accordance with Protective Order
PX6039	12/8/2011		FTC-PROD-0077324	FTC-PROD-0077336	Pricing Strategy; Proprietary Technical Information; Business Plans and Competitive Strategy; Litigation Protective Order		10 years
PX6040	4/5/2012		FTC-PROD-0079407	FTC-PROD-0079410	Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
PX6042	9/13/2009		FTC-PROD-0082571	FTC-PROD-0082578	Litigation Protective Order		In Accordance with Protective Order
PX6043	9/2/2008		FTC-PROD-0082983	FTC-PROD-0082984	Pricing Strategy; Litigation Protective Order		5 years
PX6044	5/23/2008		FTC-PROD-0082991	FTC-PROD-0082994	Pricing Strategy; Litigation Protective Order		5 years
PX6045	8/15/2011		FTC-PROD-0083286	FTC-PROD-0083290	Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
PX6046	5/15/2013		FTC-PROD-0090724	FTC-PROD-0090726	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX6047	5/22/2012		CR2R7G-000087834	CR23tom4			

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6049	9/1/2015		FTC-PROD-0064536	FTC-PROD-0064572	Customer-Specific Pricing Information; Litigation Protective Order		5 years
PX6050	4/19/2013		FTC-PROD-0036432	FTC-PROD-0036463	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX7000; RX0179	9/12/2017		PX7000-001	PX7000-066	Pricing Formulas/Models; Customer-Specific Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX7004; RX0177	9/19/2017		PX7004-001	PX7004-047	Pricing Formulas/Models; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX7006; RX0182	9/21/2017		PX7006-001	PX7006-100	Pricing Formulas/Models; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX7008; RX0178	9/26/2017		PX7008-001	PX7008-094	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX7009; RX0142	2/8/2018		PX7009-001				

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX7017; RX0124	3/9/2018		PX7017-001	PX7017-079	Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX7018; RX0122	3/13/2018		PX7018-001	PX7018-071	Pricing Strategy; Confidential Financial 10 J 1 0 0 D (n);5.St2.3 (r377.02999)-4.3 (F) (a)3.5 (tnt)9.3 (ia)2.7 (l)-4.3 (F[(1)-2.53475 (io)1.1)-2.5ss al1 7.		

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0607	4/9/2016		CR2R-002881125	CR2R-002881147	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
RX0608	8/29/2015		CR2R-003724440	CR2R-003724513			

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0635	9/1/2016		CR2R-008430653	CR2R-008430654	Customer Negotiations and Internal Customer Strategy		10 years
RX0636	1/8/2015		CR2R-009884583	CR2R-009884584	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0645	10/26/2012 16:54		CR2R-001034563	CR2R-001034567	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0646	1/8/2016 3:02		CR2R-003145104	CR2R-003145107	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
RX0647	10/11/2016 15:29		CR2R-011685708	CR2R-011685712	Customer Negotiations and Internal Customer Strategy		10 years
RX0663	8/5/2015		CR2R-000829360	CR2R-000829367	Customer-Specific Pricing Information; Pricing		

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0680	3/20/2015		CR2R-001004863	CR2R-001004867	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0681	2/8/2017		CR2R-001018534	CR2R-001018534	Product-Level Pricing Information; Pricing Strategy		5 years
RX0683	8/1/2016		CR2R-002207635	CR2R-002207636	Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions; Proprietary Technical Information		10 years
RX0684	1/12/2017		CR2R-002472308	CR2R-002472333	Production and Product Allocation Decisions		10 years
RX0685	5/7/2013		CR2R-002631483	CR2R-002631483	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0686	10/16/2015		CR2R-002907954	CR2R-002907958	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0688	6/5/2015		CR2R-003147043				





Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0725	September 2017		n/a	n/a	Confidential Financial Information and Forecasts		5 years
RX0726	7/9/1905		n/a	n/a	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
RX0728	9/20/2016		CR2R-005252392	CR2R-005252408	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0760	6/28/2012 9:30		CR2R7G-000062352	CR2R7G-000062720	Litigation Protective Order		In Accordance with Protective Order

Cristal Confidential Documents

Exhibit Number	Date	Document Description
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Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
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RX0818

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0838	6/19/2014		CR2R-005020359	CR2R-005020360	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0839	3/9/2017		CR2R-005150472	CR2R-005150490	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
RX0840	6/10/2015		CR2R-005161117	CR2R-005161143	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
RX0841	12/6/2016		CR2R-005163929	CR2R-005163941	Business Plans and Competitive Strategy		5 years
RX0842	12/2/2015		CR2R-005205821	CR2R-005205964	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
RX0845	5/31/2017		CR2R-005398198	CR2R-005398199	Cost Information; Business Plans and Competitive Strategy		5 years
RX0847	7/8/2016		CR2R-005458758	CR2R-005458807	Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0848	7/27/2015		CR2R-005637336	CR2R-005637337	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0849	9/26/2014		CR2R-005729539	CR2R-005729542	Customer Negotiations and Internal Customer Strategy		5 years
RX0851	8/21/2016		CR2R-006560000	CR2R-006560003	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
RX0853	1/16/2014		CR2R-006863807	CR2R-006863812	Proprietary Technical Information		10 years
RX0854	9/10/2015		CR2R-006953906	CR2R-006953908	Production and Product Allocation Decisions		10 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Endi
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PUBLIC

EXHIBIT 2

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

The Valspar Corporation and
Valspar Sourcing, Inc.,

Plaintiffs,

vs.

PROTECTIVE ORDER

Kronos Worldwide, Inc., and
Millennium Inorganic Chemicals, Inc.,

Defendants.

Court File No. 13-3214 (RHK/LIB)

Upon consideration of the Stipulation of the parties [Docket No. 113] as modified by this Court in accordance with Fed. R. Civ. P. 26(c), it is --

HEREBY ORDERED that:

1. This Protective Order (“Order”) shall apply to all documents, records, tangible materials and other information produced, served, or disclosed in this action from the inception of the case until its conclusion, including all app

j. “Written Assurance” means an executed document in the form attached as Exhibit A.

3. A Party may designate a document “Confidential” to protect Documents that a Party or third party believes in good faith to contain confidential commercial, proprietary, financial or business information, trade secrets, private or personal information, or other confidential research, development, regulatory or commercial information which is, by its nature, confidential.

4. Documents shall be designated as “Confidential” by placing or affixing on the document, in a manner which shall not interfere with its legibility, the notation “CONFIDENTIAL.” Documents bearing the notation “CONFIDENTIAL 13-3214 (RHK/LIB)” or similar notations are deemed notated as “CONFIDENTIAL” for the purposes of this Order. Electronic or native documents or data shall be similarly marked where practicable, and where not practicable, written notification by a producing party that it is producing Documents designated as “Confidential” shall suffice. Solely for the purposes of the efficient and timely production of documents, and to avoid the need for a detailed and expensive confidentiality examination of documents the disclosure of which is not likely to become an a producing party ayniinialiy esignate as DConfidential”] TJ0 -27.6 Td[(wan)32

documents or their contents to any person other than those specified in paragraph 6 and 7. Any other use or communication is prohibited.

6. Access to any “Confidential” document shall be limited to:
 - a. outside counsel, including any attorney of a law firm designated as attorneys of record in the Minnesota Action, as well as paralegals, secretaries, and clerical staff working with

“Confidential” information, provided that the designating party may seek relief from the Court following a good faith meet and confer effort

director, such person must agree to be bound by the terms of this Order;

g. any former employee of a party may see documents produced by his or her former employer;

h. any other person designated by written agreement between the Parties or by subsequent order of this Court after reasonable notice to all Parties.

8.

PUBLIC

10. Each person appropriately designated pursuant to paragraphs 6(c), (f), (g), (h), or (i) and/or paragraphs 7(c), (f), (g), or (h) to receive “Confidential” or “Attorneys Eyes Only” information shall execute a “Written Assurance” in the form attached as Exhibit A

11. All depositions or portions of depositions taken in this action that contain Confidential or Attorneys Eyes Only information may be designated “Confidential” or “Attorneys Eyes Only” and thereby obtain the protections accorded other “Confidential” or “Attorneys Eyes Only” documents. Confidentiality designations for depositions shall be made either on the record or by written notice to the other party within fourteen (14) business days of receipt of the transcript. Unless otherwise agreed, depositions shall be treated as “Confidential” or “Attorneys Eyes Only” during the 14-day period following receipt of the transcript. The deposition of any witness (or any portion of such deposition) that encompasses “Confidential” or “Attorneys Eyes Only” information shall be taken only in the presence of persons who are qualified to have access to such information. To the extent a party believes it is reasonably necessary for a noticed deponent or a person designated pursuant to Fed. R. Civ. P. 30(b)(6) to review documents or information marked “Confidential” to which that witness would not otherwise be permitted access in accordance with this Order in order to prepare testimony in connection with the Minnesota Action, the requesting party shall give notice to all parties 14 business days in advance of disclosure of the Confidential information and the name of the witness to whom the disclosure is sought to be made. The producing party has seven (7) business days in which to object in writing to the request. Absent objection, and upon execution by the witness of Exhibit A, the witness may review the “Confidential” documents and information identified in the notice for the limited purpose of

preparing testimony for deposition. If the producing party objects to the disclosure, the parties shall meet and confer regarding the request for disclosure. If, following a good faith meet and confer effort, the parties cannot agree, the requesting party may seek a subsequent order of this Court.

12. Any party who inadvertently fails to identify documents as “Confidential” or “Attorneys Eyes Only” shall, promptly upon discovery of its oversight, provide written notice of the error and substitute appropriately-designated documents. Any party receiving such improperly-designated documents shall retrieve such documents from persons not entitled to receive those documents and, upon receipt of the substitute documents, shall return or destroy the improperly-designated documents.

13. Documents, including, without limitation, those designated as “Confidential” or “Attorneys Eyes Only” under this Order, shall not be copied or otherwise reproduced except to the extent such copying or reproduction is reasonably necessary for permitted uses in the Minnesota Action or Related Actions. The protections conferred by this Order cover not only Documents, including, without limitation, those designated as “Confidential” or “Attorneys Eyes Only,” but also any information copied or extracted there from, as well as all copies, excerpts, summaries, or compilations thereof (hereinafter referred to collectively as “copies”), testimony, conversations, or presentations by parties or counsel to or in court or in other settings that might reveal the contents of Documents, including, without limitation, those designated as “Confidential” or “Attorneys Eyes Only.” However, reports of statistical experts that rely upon data that has been designated as “Confidential” or “Attorneys Eyes Only,” but that do not reveal an individual party’s data, are not deemed to contain “Confidential” or “Attorneys Eyes Only” information if aggregated with two or

more other parties' data. All copies of documents or information designated as "Confidential" or "Attorneys Eyes Only" under this Order or any portion thereof, shall be affixed with the notation "CONFIDENTIAL" or "ATTORNEYS EYES ONLY" if tha

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documents to be filed under seal. Any party which seeks to assert that a document should be filed with the Court under seal shall have the burden of demonstrating that the document should be filed under seal.

16. Any party may challenge the designation of any information designated “Confidential” or “Attorneys Eyes Only.” The challenging party shall identify in writing and with specificity (i.e., by document control numbers, deposition transcript page and line reference, or other means sufficient to easily locate such materials) the document(s) for which it seeks to challenge the “Confidential” or “Attorneys Eyes Only” designation. A designation challenge will trigger an obligation on the part of the producing party to make a good faith determination of whether the designation is justified. Except in the case of a designation challenge for more than 20 documents or more than 25 pages of deposition testimony, within ten (10) business days the producing party shall respond in writing to the designation challenge either agreeing to de-designate the “Confidential” or “Attorneys Eyes Only” document at issue or provide the challenging party an explanation for the designation. If a designation challenge entails more than 20 documents or more than 25 pages of deposition testimony, the challenging party and the producing party shall meet and confer, in good faith, to establish a reasonable timeframe for designation and response.

If the challenging party disagrees with a producing party’s designation of material as “Confidential” or “Attorneys Eyes Only” following a designation challenge, it may move the Court for relief from the Protective Order as to the contested designation(s), providing notice to any third party whose designation of produced documents as “Confidential” or “Attorneys Eyes Only” in the action may be affected. The party asserting that the material is “Confidential” or “Attorneys Eyes

other process. The designating party shall be solely responsible for asserting any objection to the requested production. Nothing herein shall be construed as requiring the receiving party or anyone else covered by this Order to appeal any order requiring production of “Confidential” or “Attorneys Eyes Only” information covered by this Order, or to subject himself, herself, or itself to any penalties for non compliance with any legal process order or to seek any relief from the Court.

23. In the event that any Party is served with a court order, and/or administrative or regulatory order to compel production or disclosure of any documents, materials, papers, or things that have been designated “Confidential” or “Attorneys Eyes Only,” that Party shall notify, in writing, counsel of record for the other Parties to this Order within five (5) business days of the receipt of such process or order.

24. Nothing contained herein shall prevent any party from using “Confidential” or “Attorneys Eyes Only” information for a trial in this Action. The Parties agree to meet and confer prior to the filing of final exhibit lists to evaluate which of the proposed exhibits require confidential treatment for purposes of trial, if any. The confidentiality notation may be redacted by the producing party prior to trial for any use of the material at trial by j26.52 0 Td(nt)Tj14.()Tj5.4id(by5i22.68 eta

25. The parties agree that any disclosure of “Confidential” or “Attorneys Eyes Only” information contrary to the terms of this Order by a party or anyone acting on its, his or her behalf constitutes a violation of the Order remediable by this Court, regardless of where the disclosure occurs.

26. Any subsequent party to the litigation will be bound by this Order.

27. The tmen

EXHIBIT A
ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND

I, _____ [print or type full name], of

_____ [print or type
full address], declare under penalty of perjury that I have read in _____ [print or type full address],
_____ [print or type full address],

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_____ [print or type full name] as my
Minnesota agent for service of process in connection with this action or any proceedings related to
enforcement of this Protective Order.

Date: _____, 2014

City and State where sworn and signed: _____

Printed name: _____
[print name]

Signature: _____
[signature]

Signatory's or appointed agent's address:

Signatory's or appointed agent's phone number: _____

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EXHIBIT 3

PUBLIC

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Northern Division)

BY _____

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DISTRICT

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WHEREAS, a number of third parties will or may become the subject of document and deposition discovery in these actions; and

WHEREAS, the parties and their counsel agree that their interests, the interests of the customers of the corporate parties and of other third parties that may be requested to provide discovery, and the public interest can be accommodated by a stipulation and order facilitating a timely production and appropriately limiting the use and dissemination of proprietary and competitively sensitive non-public discovery information entitled to confidential treatment.

Accordingly, it is this 21st day of September, 2011, by the United States District Court for the District of Maryland, **ORDERED**:

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legibility, the notation "CONFIDENTIAL - 1:10-cv-00318-RDB." By agreeing to this Order, no party waives the right to challenge any other party's designation. Electronic or native documents or data shall be similarly marked where practicable, and where not practicable,

CONFIDENTIAL - 1:10-cv-00318-RDB Document 196-1 Filed 09/21/11 Page 3 of 18

Information shall suffice. Select for the purposes of the efficient and timely production of

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i. Disclosure may be made to outside counsel and employees of outside counsel for the parties who have direct functional responsibility for the preparation

[REDACTED]

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producing party's current employee, such person must agree to be bound by the terms of this Order.

ix. Disclosure may be made to any other person as the parties may agree to

e) Except as provided in subparagraph 3(d) above, counsel for the parties shall keep all Discovery Material, including, without limitation, documents designated as Confidential Information under this Order, secure within their exclusive possession and shall take reasonable efforts to place such documents in a secure area

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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a) Designation Challenges. The challenging party shall identify in writing and with specificity (i.e., by document control numbers, deposition transcript page and line reference, or other means sufficient to easily locate such materials) the Discovery Material for which it seeks to challenge the Confidential Information designation. A designation challenge will trigger an obligation on the part of the producing party to make a good faith determination of whether the designation is justified. Except in the case of a designation challenge for more than 20 documents or more than 25 pages of deposition testimony, within ten (10) days the producing party shall respond in writing to the designation challenge either agreeing to de-designate the Discovery Material at issue or provide the challenging party an explanation for the

Information, within ten (10) days of such agreement or order, the producing party shall produce a new version with the confidentiality notation redacted.

[REDACTED] shall be deemed to prevent a producing

[REDACTED]

Material at Conclusion of Litigation Within one hundred

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11. Return of Inadvertently Disclosed Protected Information. Any Protected Information that the producing party deems to have been inadvertently disclosed shall be, upon written request, returned to the producing party within five (5) days, or destroyed, at that party's

PUBLIC

15. Application to Subsequent Parties. Any subsequent party to the litigation will be bound by this Order.

Dated: September 21, 2011

GOLD BENNETT CERA & SIDENER LLP

/s/ Solomon B. Cera
Solomon B. Cera - (admitted *pro hac vice*)
(Signed by Robert B. Levin with
permission of Solomon B. Cera)
scera@gbcslaw.com
C. Andrew Dirksen - (admitted *pro hac vice*)
(Signed by Robert B. Levin with
permission of C. Andrew Dirksen)
adirksen@gbcslaw.com
595 Market Street, Suite 2300
San Francisco, California 94105
Telephone: (415) 777-2230
Facsimile: (415) 777-5189

Dated: September 21, 2011

SHAPIRO SHER GUINOT & SANDLER

/s/ Paul Mark Sandler
Paul Mark Sandler
pms@shapirosher.com
Robert B. Levin
rbl@shapirosher.com
36 South Charles Street
Charles Center South, Suite 2000
Baltimore, Maryland 21201
Telephone: (410) 385-0202
Facsimile: (410) 539-7611

PUBLIC

[REDACTED]

PUBLIC

Date: September 21, 2011

ARNOLD & PORTER LLP

James L. Cooper - (admitted *pro hac vice*)
james.cooper@aporter.com
(Signed by Robert R. Levin with

PUBLIC

Dated: September 21, 2011

LOCKE, LORD, BISSELL & LIDDELL LLP

/s/ Paul E. Coggins

Paul E. Coggins

pcoggins@lockelord.com

*(Signed by Robert B. Levin with
permission of Paul E. Coggins)*

Kiprian E. Mendrygal

kmendrygal@lockelord.com

*(Signed by Robert B. Levin with
permission of Kiprian E. Mendrygal)*

Kelly R. Vickers

kvickers@lockelord.com

*(Signed by Robert B. Levin with
permission of Kelly R. Vickers)*

2200 Ross Avenue, Suite 2200

Dallas, Texas 75201

Telephone: (214) 740-8000

Facsimile: (214) 740-8800

Attorneys for Defendant Kronos Worldwide Inc.

IT IS SO ORDERED.



Richard D. Bennett

United States District Judge

SEPTEMBER 21, 2011

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CONFIDENTIAL OR PROPRIETARY

[REDACTED]

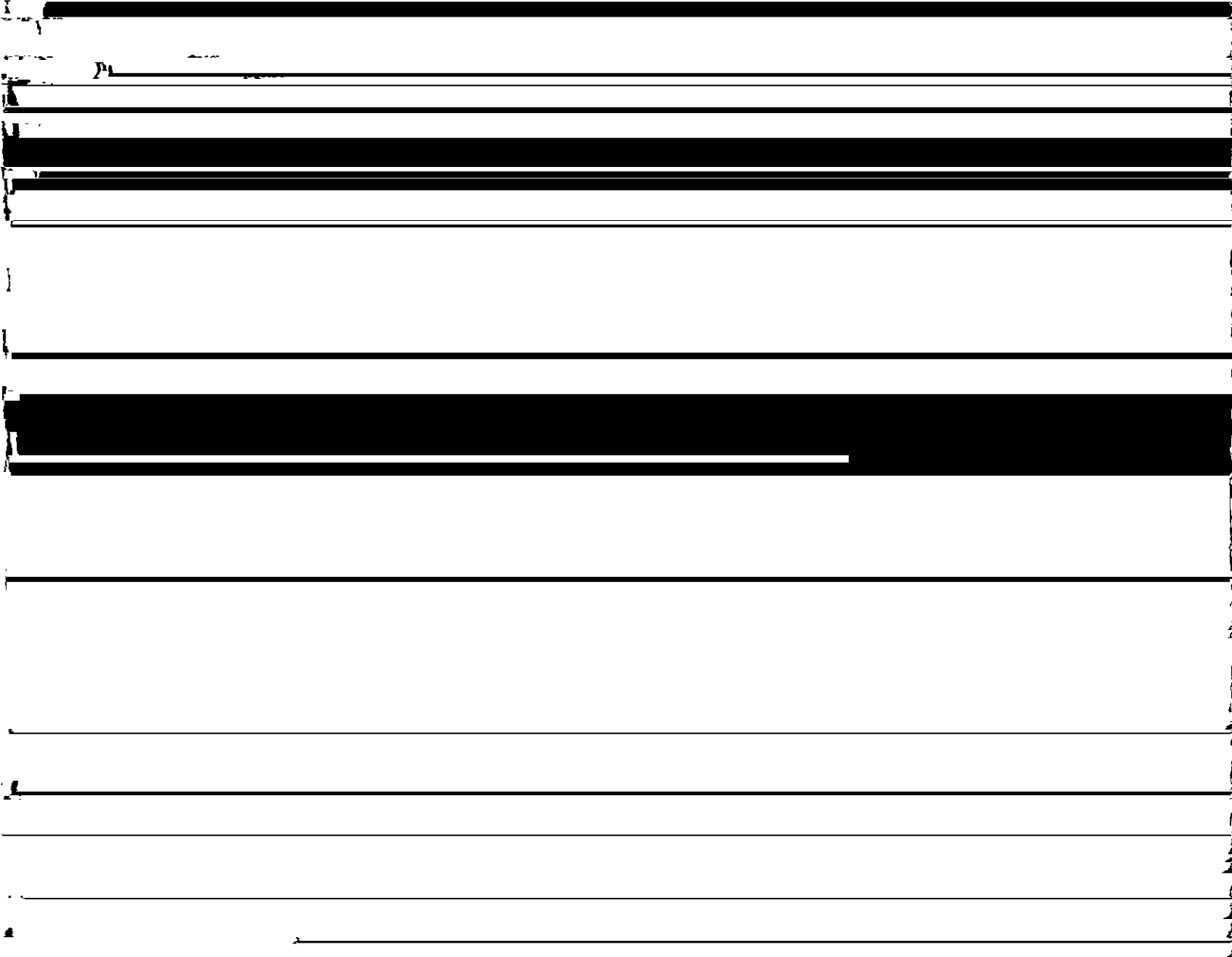
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EXHIBIT A

CERTIFICATION AND CONFIDENTIALITY AGREEMENT

I, _____, certify and declare under penalty of perjury that I have read in its entirety and understand the Stipulated Protective Order that was issued by the United States District Court of Maryland (Northern Division) on _____ in the case of *In re Titanium Dioxide Antitrust Litigation*, Master Docket No. 10-CV-00318 (RDB). I agree to comply with and to be bound by all the terms of this Stipulated Protective Order and I understand and acknowledge that failure to so comply could expose me to sanctions and

I understand and acknowledge that failure to so comply could expose me to sanctions and



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EXHIBIT 4

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

Tronox Limited
a corporation,

National Industrialization Company
(TASNEE)
a corporation,

The National Titanium Dioxide
Company Limited (Cristal)
a corporation,

And

Cristal USA Inc.
a corporation.

ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Avenue, NW
Washington, D.C. 20001-3743
(202) 942-5000
(202) 942-5999 (facsimile)

21. As such, while the documents themselves may be more than three years old, the information contained in those documents remains competitively sensitive, and disclosure of that information will harm Cristal as much and in the same way as disclosure of more recent documents.

B. Category 2: Customer-Specific Pricing Information

22. Cristal's pricing for TiO₂ products is customer-specific and not generally known outside the particular customer relationship. Cristal negotiates prices for each product on a customer-by-customer basis at arm's length based on a multitude of factors regarding

23. Documents in this category contain the specific pricing and, in some cases, contract terms

29. Only one document falling exclusively into this category is older than three years old:
PX2011.

30.

31.

32.

33.

34.

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36. The type of information contained in this category of documents is treated as highly confidential and proprietary within Cristal. The information is disseminated on a need-to-know basis within Cristal. This granular information is not disclosed outside of the company and its owners other than under an NDA for specific limited circumstances and, in particular, is not disclosed to Cristal's competitors.

37. If this information were to become public, Cristal would be significantly disadvantaged during negotiations with customer [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

38. Competitors could also use this information to undermine Cristal's competitiveness by utilizing Cristal's proprietary information to exploit its perceived weaknesses or adopt its successful strategies.

39. Because of the long-term customer relationships Cristal has built and the length of the TiO2 business cycle, Cristal would continue to be harmed by release of this information over the next five years.

D. Category 4: Cost Information

40. Documents in this category include specific information about Cristal's costs, such as overhead and input cost information for Cristal's business and production facilities.

41. The type of information contained in this category of documents is treated as highly confidential and proprietary within Cristal. The information is disseminated on a need-to-know basis within Cristal. This granular information is not disclosed outside of the company and its owners other than under an NDA for specific limited circumstances and, in particular, is not disclosed to Cristal's competitors.

42. Customers receiving this information could use Cristal's costs to gain an advantage in negotiations, to Cristal's detriment.

43. Competitors could exploit this information in negotiations with Cristal's customers and could use it to identify and target areas where such information would permit the competitor to gain a competitive advantage over Cristal and focus resources on those areas.

44. Similarly, competitors could use such information to inform their own production decisions in ways that would be harmful to Cristal.

45.

59. Public disclosure would also harm Cristal's ability to compete effectively against rivals, who would seek to exploit their new-found knowledge of Cristal's pricing strategy and appropriate its methodology without having to expend the resources Cristal has put into developing it.

60. Competitors could also use this information to gain a strategic advantage in their own negotiations with customers.

61.

C. Category 7: Customer Negotiations and Internal Customer Strategy

62. Documents in this category contain information reflecting contract and sales negotiations with specific customers and Cristal's internal strategy with respect to those negotiations.

63. Customer relationship management is a critical part of Cristal's business. Public disclosure of these confidential customer and internal communications would harm Cristal by damaging established customer relationships, gp 1 108 455.64001 Tm (63l)-4 (y)orm (f)-55 (om)14.6s r .

75. Release of such documents would significantly lessen Cristal's abilities to compete in the marketplace in the following ways:

76.

89. Release of such documents would significantly lessen Cristal's abilities to compete in the marketplace. Cristal would lose competitive advantages it has developed and is working to develop with regard to its manufacturing processes and systems as well as product development and improvement.

90. Competitors will be able to unfairly appropriate Cristal's innovations and proprietary information. Competitors would be able to ascertain any weaknesses within Cristal's manufacturing systems and processes as well as in Cristal's products and unfairly exploit that confidential information to significantly lessen Cristal's competitiveness in the marketplace.

91. Cristal devotes significant resources to developing and refining its technical expertise and keeping the details of that expertise confidential. These details are trade secrets, and public disclosure of these trade secrets would diminish their value.

92. The details of the facilities and processes discussed in these documents do not change significantly over time, so it is important that Cristal be able to maintain the confidentiality of this information for the foreseeable future, for at least the next 17.2 (e)-2.8 (C TJ1 0 2.9 (a)-1.7 (dv)10.4 (a)-2.9 (nt)6.8 (a)-2.9

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
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PX0020; RX1173

2/5/2018

PX0020-001

PX0020-037

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2009	5/1/2017		CR2R-000234485	CR2R-000234487	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2011	4/5/2013		CR2R-000262988	CR2R-000262993	Customer-Specific Pricing Information		Indefinite (or, in the alternative, at least 10 years)
PX2014; RX0756	11/21/2016		CR2R-001578220	CR2R-001578448	Business Plans and Competitive Strategy; Cost Information		5 years
PX2016	4/3/2013		CR2R-001657616	CR2R-001657618	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2020	8/25/2016		CR2R-002371813	CR2R-002371814	Business Plans and Competitive Strategy		5 years
PX2021	5/25/2011		CR2R-000328563	CR2R-000328565	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2025	00/00/2017		CR2R-000781209	CR2R-000781209	Product-Level Pricing Information		5 years
PX2026	10/6/2017		CR2R-000794237	CR2R-000794237	Customer-Specific Pricing Information; Business Plans and Competitive Strategy		5 years
PX2027	9/14/2016		CR2R-001000051				

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2031	11/18/2015		CR2R-001969524	CR2R-001969593	Pricing Formulas/Models; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX2036	11/4/2011		CR2R-001813614	CR2R-001813616	Customer-Specific Pricing Information; Pricing Strategy		0 years
PX2038	8/29/2015		CR2R-006551755	CR2R-006551762	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		0 years
PX2039	9/9/2016		CR2R-000050431	CR2R-000050435	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		0 years
PX2041	8/19/2016		CR2R-000197278	CR2R-000197279	Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy		0 years
PX2042	9/23/2016		CR2R-000781208	CR2R-000781227	Product-Level Pricing Information; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		0 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
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Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2061	3/16/2017	[REDACTED]	CRI_SR0000001343	CRI_SR0000001359	Business Plans and Competitive Strategy	[REDACTED]	5 years
PX2062	5/12/2017	[REDACTED]	CRI_SR0000001313	CRI_SR0000001328	Business Plans and Competitive Strategy	[REDACTED]	5 years
PX2065	9/9/2013	[REDACTED]	CR2R-000296975	CR2R-000296976	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy	[REDACTED]	5 years
PX2068	7/17/2015	[REDACTED]	CR2R-000532792	CR2R-000532793	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy	[REDACTED]	10 years
PX2069	8/30/2016	[REDACTED]	CR2R-002533239	CR2R-002533242	Customer-Specific Pricing Information	[REDACTED]	5 years
PX2070	2/28/2012	[REDACTED]	CR2R-000317646	CR2R-000317650	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy	[REDACTED]	5 years
PX2077	11/24/2015	[REDACTED]	CR2R-001420053	CR2R-001420057	Pricing Strategy	[REDACTED]	5 years
PX2088	6/17/2014	[REDACTED]	CR2R-000288754	CR2R-000288764	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy	[REDACTED]	5 years
PX2089	9/1/2016	[REDACTED]	CR2R-000774681	CR2R-000774682	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy	[REDACTED]	10 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2110; RX0689	3/29/2017		CR2R-003151848	CR2R-003151850	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2112	6/8/2016		CR2R-003481215	CR2R-003481216	Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions		10 years
PX2113	1/20/2017		CR2R-005822092	CR2R-005822093	Pricing Strategy		5 years
PX2116; RX0734	8/23/2016		CR2R-005255428	CR2R-005255623	Customer-Specific Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2122	3/5/2017		CR2R-000561137	CR2R-000561141	Production and Product Allocation Decisions		10 years
PX2123	11/22/2016		CR2R-005247497	CR2R-005247517	Business Plans and Competitive Strategy		5 years
PX2124	3/20/2017		CR2R-000563218	CR2R-000563248	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2125	5/28/2017		CR2R-000563611	CR2R-000563616	Production and Product Allocation Decisions; Cost		

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document
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Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates
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Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2158	12/4/2015		CR2R-001735513	CR2R-001735517	Cost Information; Business Plans and Competitive Strategy		5 years
PX2162	7/15/2016		CR2R-003737613	CR2R-003737614	Business Plans and Competitive Strategy		5 years
PX2163	3/30/2016		CR2R-011855153	CR2R-011855158	Confidential Financial Information and Forecasts		
PX2164; RX0741	12/16/2016		CR2R-003738762	CR2R-003738819	Proprietary Technical Information		10 years
PX2165	5/26/2017		CR2R-002850635	CR2R-002850637	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information		10 years
PX2167	5/9/2016		CR2R-001671028	CR2R-001671029	Business Plans and Competitive Strategy		5 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2174	9/14/2017		CR2R-002461395	CR2R-002461398	Production and Product Allocation Decisions; Cost Information		10 years
PX2175	3/30/2017		CR2R-002836565	CR2R-002836576	Cost Information; Proprietary Technical Information		10 years
PX2177	12/22/2016		CR2R-006539196	CR2R-006539247	Production and Product Allocation Decisions; Cost Information		10 years
PX2178	9/19/2016		CR2R-006532779	CR2R-006532922	Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2179	04/00/2017		CRI_SR0000001434	CRI_SR0000001441	Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX2180	2/8/2017		CR2R-000569711	CR2R-000569739	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2181	6/9/2017		CR2R-000573780	CR2R-000573781	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2183	9/2/2016		CR2R-000595459	CR2R-000595464	Proprietary Technical Information		10 years
PX2184	5/24/2017		CR2R-000596605	CR2R-000596608	Sensitive Compensation and Benefits Information		5 years
PX2187	6/21/2017		CR2R-008126684	CR2R-008126688			

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
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Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2207	4/17/2017		CR2R-005147658	CR2R-005147717	Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
PX2208; RX0610	12/00/2016		CR2R-005986934	CR2R-005987017	Cost Information; Proprietary Technical Information		10 years
PX2209	12/3/2015		CR2R-004694271	CR2R-004694273	Business Plans and Competitive Strategy		5 years
PX2210	9/29/2015		CR2R-005414290	CR2R-005414374	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2211	5/10/2017		CR2R-002414676	CR2R-002414677	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2217	12/00/2016		CRI_SR0000001585	CRI_SR0000001590	Production and Product Allocation Decisions; Cost Information		10 years
PX2218	12/22/2014		CR2R-001073808	CR2R-001073810	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2219	9/15/2016		CR2R-000774485	CR2R-000774489	Cost Information; Business Plans and Competitive Strategy		5 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
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PX2220

9/7/2016

CR2R-000197723

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2246	8/19/2015		CR2R7G-000005474	CR2R7G-000005680	Customer-Specific Pricing Information; Litigation Protective Order		n Accordance with Protective Order
PX2247	2/18/2015		CR2R7G-000022383	CR2R7G-000022661	Product-Level Pricing Information; Litigation Protective Order		n Accordance with Protective Order
PX2248	8/3/2012		CR2R7G-000030929	CR2R7G-000030990	Litigation Protective Order		n Accordance with Protective Order
PX2249	10/18/2012		CR2R7G-000045905	CR2R7G-000045970	Litigation Protective Order		n Accordance with Protective Order
PX2250	7/17/2012		CR2R7G-000067725	CR2R7G-000067780	Pricing Strate2.5 (ip (c)-1.8 (ing35 ()ri)-1.8 (c)2.119 l)-1.8 (c)2.119 n4.5 (0)] 1.2 (t)8.5 (c)-4.5 (t)8.4 (iv)-9. (ing)-5.1 ()-3.5 ()e 528.2s1 (e)6.s/rmla 56.		

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2259	6/9/2016		CR2R-000110711	CR2R-000110713	Cost Information; Proprietary Technical Information		10 years
PX2262	1/30/2014		CR2R-000292951	CR2R-000292956	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2270	9/2/2014		CR2R-002663153	CR2R-002663155	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
PX2271	5/18/2016		CR2R-003728694	CR2R-003728705	Business Plans and Competitive Strategy		5 years
PX2274	5/15/2015		CR2R-008089004	CR2R-008089005	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2275	9/29/2016		CR2R-000966866	CR2R-000966867			

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2293	2/16/2017		CR2R-004366850	CR2R-004366850	Business Plans and Competitive Strategy		5 years
PX2294	6/6/2017		CR2R-004375903	CR2R-004375904	Product-Level Pricing Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2295; RX0743	2/5/2017		CR2R-004367689	CR2R-004367690	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX2299	8/1/2016		CR2R-000774978	CR2R-000774981			

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2310	7/28/2017		CRP3-000501244	CRP3-000501247	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2311	7/27/2017		CRP3-000501252	CRP3-000501257	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2312	10/18/2017		CRP3-000519313	CRP3-000519314	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2313	10/18/2017		CRP3-000519385	CRP3-000519386	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2314	10/25/2017		CRP3-000520804	CRP3-000520808	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
PX2315; RX0735	5/18/2017		CR2R-011267074	CR2R-011267078	Pricing Formulas/Models; Customer-Specific Pricing Information		Indefinite (or, in the alternative, at least 10 years)
PX2316; RX0736	10/31/2017		CRP3-000521998	CRP3-000522000	Customer-Specific Pricing Information; Product-Level Pricing Information		5 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2340	3/6/2017		CR2R-006003947	CR2R-006003950	Business Plans and Competitive Strategy		5 years
PX2343	5/26/2016		CR2R-003742634	CR2R-003742640	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
PX2345	10/24/2017		CRP3-000535641	CRP3-000535652	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2346	11/2/2017		CRP3-000535428	CRP3-000535429	Business Plans and Competitive Strategy		5 years
PX2347	8/22/2017		CRP3-000535221	CRP3-000535224	Confidential Financial Information and Forecasts; Cost Information; Business Plans and Competitive Strategy		5 years
PX2356	10/1/2017		CRP3-000191352	CRP3-0000535gg-(e)] TJ	1 (P)58 539.28 I 375.35 (3)-1.1a.7 ming.1 (r)-7 ming.1	,3 (St)8.n5 (19.5 (ns)-2.9 (-)-3.5 (a)3.5 (nd)1.2 (-)-2(-)-3.5 (a)3.5 (nd)1.8) (-)-2.1 564s (535 .5 (

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2360	9/29/2017		CRP3-000191372	CRP3-000191385	Pricing Formulas/Models		Indefinite (or, in the alternative, at least 10 years)
PX2363	8/29/2017						

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2370	5/2/2017		CRP3-000531968	CRP3-000180011	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information		10 years
PX2371	12/6/2017		CRP3-000186409	CRP3-000186429	Cost Information; Proprietary Technical Information		10 years
PX2372	10/22/2017		CRP3-000189773	CRP3-000189778	Proprietary Technical Information		10 years
PX2373; RX0731	10/3/2017		CRP3-000191135	CRP3-000191207	Pricing Strategy; Business Plans and Competitive Strategy; Confidential Financial Information and Forecasts; Cost Information		5 years
PX2376	8/19/2017		CRP3-000227621	CRP3-000227626	Proprietary Technical Information		10 years
PX2377	10/12/2017		CRP3-000228672	CRP3-000228697	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2378; RX0866	10/13/2017		CRP3-000229060	CRP3-000229081	Cost Information; Proprietary Technical Information		10 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2380	11/6/2017		CRP3-000230909	CRP3-000230912	Proprietary Technical Information		10 years
PX2381	9/29/2017		CRP3-000241505	CRP3-000241508	Proprietary Technical Information		10 years
PX2382	10/12/2017		CRP3-000241724	CRP3-000241792	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2383	7/12/2017		CRP3-000505856	CRP3-000505899			

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2400	9/29/2017		CRP3-000233935	CRP3-000233938	Proprietary Technical Information		
PX2401	9/30/2017		CRP3-000234087	CRP3-000234124	Proprietary Technical Information		10 years
PX2402	10/3/2017		CRP3-000233965	CRP3-000233966	Proprietary Technical Information		10 years
PX2404	9/29/2017		CRP3-000233948	CRP3-000233952	Proprietary Technical Information		10 years
PX2406	10/6/2017		CRP3-000233391	CRP3-000233393	Cost Information; Proprietary Techn7		

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2411	11/1/2017		CRP3-000234619	CRP3-000234673	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
PX2412	11/3/2017		CRP3-000230992	CRP3-000231001	Proprietary Technical Information		10 years
PX2413	11/6/2017		CRP3-000235112	CRP3-000235115	Proprietary Technical Information		10 years
PX2415	8/19/2017		CRP3-000238929	CRP3-000238935	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
PX2416	9/18/2017		CRP3-000241916	CRP3-000241922	Proprietary Technical Information		10 years
PX2418	10/26/2017		CRP3-000234521	CRP3-000234527	Proprietary Technical Information		10 years
PX2420	8/19/2017		CRP3-000245057	CRP3-000245058	Production and Product Allocation Decisions		10 years

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2423	8/31/2017		CRP3-000244734	CRP3-000244735	Proprietary Technical Information		10 years
PX2425	9/29/2017		CRP3-000241505	CRP3-000241508	Proprietary Technical Information		10 years
PX2426	11/6/2017		CRP3-000230909	CRP3-000230912	Proprietary Technical Information		10 years
PX2427	11/6/2017		CRP3-000230926	CRP3-000230931	Proprietary Technical Information		10 years
PX2428	11/1/2017		CRP3-000552059	CRP3-000552063	Production and Product Allocation Decisions; Cost Information		10 years
PX2431	10/12/2017		CRP3-000237563	CRP3-000237631	Cost Information; Proprietary Technical Information		10 years
PX2433	11/18/2015		CR2R-001568001	CR2R-001568001	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions		10 years
PX2435	11/3/2015		CR2R-004014415	CR2R-004014415	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2438	5/7/2017		CR2R-006004150	CR2R-006004153	Sensitive Compensation and Benefits Information		5 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates
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Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2455	1/29/2016		CR2R-000787749	CR2R-000787751	Pricing Strategy; Business Plans and Competitive Strategy		5 years
PX2456	11/18/2015		CR2R-000525575	CR2R-000525576	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations		

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2478	10/24/2017		CRP3-000553491	CRP3-000553492	Proprietary Technical Information		10 years
PX2479	10/25/2017		CRP3-000552828	CRP3-000552830	Production and Product Allocation Decisions		10 years
PX2480	12/28/2017		CRP3-000551415	CRP3-000551420	Proprietary Technical Information		10 years
PX2482	11/2/2017		CRP3-000552029	CRP3-000552035	Proprietary Technical Information		10 years
PX2484	10/14/2017		CRP3-000553281	CRP3-000553282	Production and Product Allocation Decisions: Cost		

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX2490	12/20/2017		CRP3-000189745	CRP3-000189746	Production and Product Allocation Decisions; Cost Information		10 years
PX2492	1/4/2018		CRP3-000227455	CRP3-000227456	Production and Product Allocation Decisions; Cost Information		10 years
PX2493	9/4/2017		CRP3-000241242	CRP3-000241244	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
PX2495	1/4/2018		CRP3-000531043	CRP3-000531048	Cost Information		5 years
PX2496	12/5/2017		CRP3-000569629	CRP3-000569631	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX5000; RX1063	4/6/2018		PX5000-001	PX5000-171	Product-Level Pricing Information; Business Plans and Competitive Strategy		5 years
PX5001; RX1064	4/6/2018		PX5001-001	PX5001-056	Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX6000	12/16/2011		FTC-PROD-0073442	FTC-PROD-0073444	Pricing Strategy; Confidential Financial Information and Forecasts; Litigation Protective Order		5 years



Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6038	11/21/2002		FTC-PROD-0077226	FTC-PROD-0077228	Litigation Protective Order		In Accordance with Protective Order
PX6039	12/8/2011		FTC-PROD-0077324	FTC-PROD-0077336	Pricing Strategy; Proprietary Technical Information; Business Plans and Competitive Strategy; Litigation Protective Order		10 years
PX6040	4/5/2012		FTC-PROD-0079407	FTC-PROD-0079410	Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
PX6042	9/13/2009		FTC-PROD-0082571	FTC-PROD-0082578	Litigation Protective Order		In Accordance with Protective Order
PX6043	9/2/2008		FTC-PROD-0082983	FTC-PROD-0082984	Pricing Strategy; Litigation Protective Order		5 years
PX6044	5/23/2008		FTC-PROD-0082991	FTC-PROD-0082994	Pricing Strategy; Litigation Protective Order		5 years
PX6045	8/15/2011		FTC-PROD-0083286	FTC-PROD-0083290	Customer Negotiations and Internal Customer Strategy; Litigation Protective Order		5 years
PX6046	5/15/2013		FTC-PROD-0090724	FTC-PROD-0090726	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX6047	5/22/2012		CR2R7G-000087834	CR23tom4			

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX6049	9/1/2015		FTC-PROD-0064536	FTC-PROD-0064572	Customer-Specific Pricing Information; Litigation Protective Order		5 years
PX6050	4/19/2013		FTC-PROD-0036432	FTC-PROD-0036463	Customer-Specific Pricing Information; Litigation Protective Order		In Accordance with Protective Order
PX7000; RX0179	9/12/2017		PX7000-001	PX7000-066	Pricing Formulas/Models; Customer-Specific Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX7004; RX0177	9/19/2017		PX7004-001	PX7004-047	Pricing Formulas/Models; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX7006; RX0182	9/21/2017		PX7006-001	PX7006-100	Pricing Formulas/Models; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		Indefinite (or, in the alternative, at least 10 years)
PX7008; RX0178	9/26/2017		PX7008-001	PX7008-094	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX7009; RX0142	2/8/2018		PX7009-001				

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
PX7017; RX0124	3/9/2018		PX7017-001	PX7017-079	Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
PX7018; RX0122	3/13/2018		PX7018-001	PX7018-071	Pricing Strategy; Confidential Financial 10 J	1 0 0 D (n);5.St2.3 (r377.02999)-4.3 (F) (a)3.5 (tnt)9.3 (ia)2.7 (l)-4.3 (F[(1)-2.53475 (io)1.1)-2.5ss al1 7.	

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0607	4/9/2016		CR2R-002881125	CR2R-002881147	Production and Product Allocation Decisions; Cost Information; Proprietary Technical Information		10 years
RX0608	8/29/2015		CR2R-003724440	CR2R-003724513			

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0635	9/1/2016		CR2R-008430653	CR2R-008430654	Customer Negotiations and Internal Customer Strategy		10 years
RX0636	1/8/2015		CR2R-009884583	CR2R-009884584	Customer-Specific Pricing Information; Product-Level Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0645	10/26/2012 16:54		CR2R-001034563	CR2R-001034567	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0646	1/8/2016 3:02		CR2R-003145104	CR2R-003145107	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
RX0647	10/11/2016 15:29		CR2R-011685708	CR2R-011685712	Customer Negotiations and Internal Customer Strategy		10 years
RX0663	8/5/2015		CR2R-000829360	CR2R-000829367	Customer-Specific Pricing Information; Pricing		

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0680	3/20/2015		CR2R-001004863	CR2R-001004867	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0681	2/8/2017		CR2R-001018534	CR2R-001018534	Product-Level Pricing Information; Pricing Strategy		5 years
RX0683	8/1/2016		CR2R-002207635	CR2R-002207636	Customer Negotiations and Internal Customer Strategy; Production and Product Allocation Decisions; Proprietary Technical Information		10 years
RX0684	1/12/2017		CR2R-002472308	CR2R-002472333	Production and Product Allocation Decisions		10 years
RX0685	5/7/2013		CR2R-002631483	CR2R-002631483	Customer-Specific Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		5 years
RX0686	10/16/2015		CR2R-002907954	CR2R-002907958	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy		10 years
RX0688	6/5/2015		CR2R-003147043				





Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0725	September 2017		n/a	n/a	Confidential Financial Information and Forecasts		5 years
RX0726	7/9/1905		n/a	n/a	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
RX0728	9/20/2016		CR2R-005252392	CR2R-005252408	Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0760	6/28/2012 9:30		CR2R7G-000062352	CR2R7G-000062720	Litigation Protective Order		In Accordance with Protective Order

Cristal Confidential Documents

Exhibit Number	Date	Document Description
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Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
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RX0818

Exhibit Number	Date	Document Description	Beginning Bates	Ending Bates	Categories of Confidential Information	Further Description of Document	Duration of <i>In Camera</i> Treatment
RX0838	6/19/2014		CR2R-005020359	CR2R-005020360	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		5 years
RX0839	3/9/2017		CR2R-005150472	CR2R-005150490	Production and Product Allocation Decisions; Proprietary Technical Information		10 years
RX0840	6/10/2015		CR2R-005161117	CR2R-005161143	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy		5 years
RX0841	12/6/2016		CR2R-005163929	CR2R-005163941	Business Plans and Competitive Strategy		5 years
RX0842	12/2/2015		CR2R-005205821	CR2R-005205964	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Production and Product Allocation Decisions; Cost Information; Business Plans and Competitive Strategy		10 years
RX0845	5/31/2017		CR2R-005398198	CR2R-005398199	Cost Information; Business Plans and Competitive Strategy		5 years
RX0847	7/8/2016		CR2R-005458758	CR2R-005458807	Production and Product Allocation Decisions; Proprietary Technical Information; Business Plans and Competitive Strategy		10 years
RX0848	7/27/2015		CR2R-005637336	CR2R-005637337	Customer-Specific Pricing Information; Customer Negotiations and Internal Customer Strategy		10 years
RX0849	9/26/2014		CR2R-005729539	CR2R-005729542	Customer Negotiations and Internal Customer Strategy		5 years
RX0851	8/21/2016		CR2R-006560000	CR2R-006560003	Production and Product Allocation Decisions; Business Plans and Competitive Strategy		10 years
RX0853	1/16/2014		CR2R-006863807	CR2R-006863812	Proprietary Technical Information		10 years
RX0854	9/10/2015		CR2R-006953906	CR2R-006953908	Production and Product Allocation Decisions		10 years

Cristal Confidential Documents

Exhibit Number	Date	Document Description	Beginning Bates	Endi
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PUBLIC

EXHIBIT 5

12.07.2017
PUBLIC 589201

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES

ORIGINAL

In the Matter of)
)
Tronox Limited,)
 a corporation,)
)
National Industrialization Company)
(TASNEE))
 a corporation,)
)
National Titanium Dioxide Company)

DOCKET NO. 9377

PROTECTIVE ORDER GOVERNING CONFIDENTIAL MATERIAL

Commission Rule 3.31(d) states: "In order to protect the parties and third parties against improper use and disclosure of confidential information, the Administrative Law

[REDACTED]

D. Michael Chappell
D. Michael Chappell
Chief Administrative Law Judge

Date: December 7, 2017

ATTACHMENT A

For the purpose of protecting the interests of complainants and third parties in the above-captioned matter, and in accordance with the provisions of the Access to Information Act, the following information is being disclosed to you for your information only. This information is being disclosed to you for your information only. This information is being disclosed to you for your information only.

IT IS HEREBY ORDERED THAT this Order governing Confidential Material (Protective Order) shall apply to all Confidential Material, as defined in this Order.

1. As used in this Order, "confidential material" shall refer to any document or portion thereof that contains personal information, sensitive personal information, or information that is otherwise confidential. Sensitive personal information shall refer to, but shall not be limited to, an individual's Social Security number, tax, travel identification, passport, financial account number, credit card or debit card number, driver's license number or status, identification number, passport number, date of birth (other than year), and any sensitive health information, including but not limited to, an individual's medical records. "Document" shall refer to any discoverable writing, recording, transcript of oral testimony, or electronically stored information in the possession, custody or control of a party. "Commission" shall refer to the Federal Trade Commission ("FTC"), or any of its employees, agents, or consultants, or any other person retained as a consultant or expert for purposes of this proceeding.
2. Any document or portion thereof submitted by a respondent or a third party during the Federal Trade Commission investigation or during the course of any proceeding that is entitled to confidentiality under the General Data Protection Regulation or any regulatory interpretation, or precedent concerning data privacy, in the possession of the Commission or any of its employees, agents, or consultants, or any other person retained as a consultant or expert, shall be treated as confidential material for purposes of this Order. The identity of a third party who submitted such confidential material shall also be treated as confidential material for the purposes of this Order where the submitter has requested such confidential treatment.
3. The parties to this proceeding, as complainant and respondent, may designate any responsive document or portion thereof as confidential material, including documents obtained by them from third parties pursuant to discovery or as otherwise obtained.
4. The parties to this proceeding, as complainant and respondent, shall provide to each third party a copy of this Order so as to inform each such third party of its obligations hereunder.
5. A designation of confidentiality shall constitute a representation in good faith, and after careful determination that the information is not reasonably available to the public domain and that a waiver of the material so designated constitutes confidential material as defined in Paragraph 1 of this Order.

6. Material may be designated as confidential by placing on the document containing such information, in such manner as will not interfere with its use, any marking or if an entire folder or box of documents is confidential by placing on any one of the folders or boxes, and on any information contained therein, a marking or other appropriate notation that identifies such information as confidential. Any portion or portions of the document consisting of personal and financial information contained in electronic documents may also be designated as confidential by placing the designation "CONFIDENTIAL" in any other appropriate notice that identifies the procedure that is to be followed in any other medium on which the document is produced. Masked or otherwise obscured copies of documents may be produced where the portions deleted contain privileged matter, provided that the copy produced shall indicate at the appropriate point that portions have been deleted and the reasons therefor.

7. Confidential material shall be disclosed only to (a) the Administrative Law Judge presiding over such proceedings, personnel assisting the Administrative Commission and its employees and personnel retained by the Commission as consultants for this proceeding; (b) judges and clerks of any court having jurisdiction over any appellate review of such proceedings; (c) any person who is a record for any respondent, their associated attorney and/or employees of their law firm(s); provided, however, that confidential material shall not be disclosed to any person outside of those listed herein, preparation of an exhibit for use in such proceedings, provided they are not confidential in any way, or to any other person, without the agreement to do so by the person(s) to whom the confidential material is disclosed who may have authored or received the information in question.

8. Disclosure of confidential material to any person described in Paragraph 7 of this Order shall be only for the purposes mentioned in the prior paragraph. In the event of any appeal therefrom, and for no other purpose whatsoever, provided, however, that the Commission may, subject to taking appropriate steps to preserve the confidentiality of such material, use or disclose confidential material as provided in the applicable provisions of sections 87(2)(b) and 87(2)(g) of the Freedom of Information Law, or as otherwise required or imposed upon the Commission.

9. In the event that confidential material is contained in any pleading, motion, exhibit or other paper filed or submitted with the Secretary of the Commission, the Secretary shall not be bound to release such papers, but such papers shall be filed *in camera*. To the extent that such material was originally submitted by a third party, the only person to whom such material may be disclosed, without the consent of the submitter of such confidential material, is the party who submitted the paper, and such material to have *in camera* treatment until further order of the Administrative Law Judge. Provided, however, that such papers may be furnished to persons or entities who may receive confidential material pursuant to Paragraphs 7 or 8. If an original filing of any paper containing confidential information is made, the filing party shall file a duplicate copy of the paper that does not reveal confidential material. In the event of a protest or any such material, a party may file on the public record a duplicate copy which also contains the formerly protected material.

10. If counsel plans to introduce into evidence at the hearing any document or transcript containing confidential material produced by another party or third party, the party shall provide advance notice to the other party or third party in writing, together with a copy of the order, that the party wishes to seek an order that the document or transcript be treated as confidential. The notice shall include an appropriate motion with the Administrative Law Judge, who shall have the authority to grant or deny such motion. Except where such an order is granted, a duplicate copy of such document or transcript with the confidential material deleted therefrom may be placed on the public record.

11. If any party receives a discovery request in any investigation or in any other proceeding or matter that may require disclosure of confidential material submitted by another party or third party, the recipient of the discovery request shall promptly notify the submitter of such request. Unless a shorter time is mandated by an order of a court, such notification shall be in writing and received by the submitter at least 10 business days before production, and shall include a copy of this protective order and a cover letter that will apprise the submitter of its rights hereunder. Nothing in this order shall be construed as requiring the recipient of the discovery request to subject itself to any penalties for non-compliance with any such order, or to grant relief from the Administrative Law Judge or the Commission. The recipient shall know and oppose the submitter's efforts to challenge the discoverable non-confidential material. In addition, nothing in this order shall be construed as limiting the application of the Rules of Practice, 45 CFR 4.11(f), its discovery provisions in arbitral proceedings that are directed to the Commission.

12. At the time that any consultant or other person retained to assist counsel in the preparation of this action concludes participation in the action, such person shall return to counsel all copies of documents or portions thereof designated as confidential that are in the possession of such person, together with all notes, memoranda or other papers containing confidential information. At the conclusion of the proceedings, including the exhaustion of judicial review, the parties shall retain documents obtained in this action to their submitters, provided, that the Commission's general retention policies and procedures shall be governed by the provisions of 45 CFR 4.12 and 4.13 and 4.14.

13. The provisions of this Protective Order, including its application to the submission and use of confidential discovery material, shall, without further discussion of the submitter or further order of the Commission, apply to the handling and retention of this material.