ORIGINAL PUBLIC-REDACTED

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

In the Matter of
Jerk, LLC, a limited liability company,
also d/b/a JERK.COM, and
John Fanning, TREATMENT

Pursuant to Rule 3.45 of the Federal Trade Commission's Rules of Practice, 16 C.F.R
§ 3.45(b), non-party Stripe, Inc. ("Stripe") respectfully moves this Court for in camera treatment oftwo competitively-sensitive, confidential business documents (the "Confidential Documents"). Stripe produced these documents, among others, in response to a third-party subpoena and civil investigative demand in this matter. The Federal Trade Commission ("FTC") has now notified Stripe that it intends to introduce six of Stripe's documents, including the Confidential Documents, into evidence at the administrative trial in this matter. See Letter from the Federal Trade Commission dated October 15, 2014 (attached as Exhibit A).
The FTC notified Stripe that intends to seek permanent in camera treatment for five of
the six Stripe documents, including the Confidential Documents, which contain sensitive financial or personal information.

1 The Confidential Documents, however, warrant additional
protection from public disclosure given the sensitive business information and trade secrets they contain. Thus, Stripe submits this Motion requesting permanent in camera treatment of the

1 The FTC filed it motion on December 23, 2014 and seeks permanent in camera treatment for five Stripe documents CX0421 -CX0425. Stripe joins the FTC's request for in camera treatment of the personally

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Confidential Documents in their entirety.
All ofthe materials for which Stripe is seeking in camera treatment are confidential
business documents, such that if they were to become

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In considering both secrecy and materiality, the Court may consider: (1) the extent to
which the information

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EXHIBIT A

PUBLIC-REDACTED

EXHIBITB

UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION OFFICE OF ADM1NISTRATIVE LAW JUDGES

In the Matter of

Jerk, LLC, a limited liability company,
also d/b/a JERK.COM, and

John Fanning, individually and
as a member of Jerk,LLC,
Respondents

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7. Both CX0421 and CX0422 contain business and trade secrets in the form of internal Stripe dashboards, which apply Stripe's secret formulas and technical information. Stripe uses this information in connection

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EXHIBITC

Hearing Exhibits Nos. CX0421 and CX0422

MARKED CONFIDENTIAL REDACTION IN THEIR ENTIRETY REQUESTED

CERTIFICATE OF SERVICE

I, Christine Coopey, declare under penalty of perjury under the laws of the State of California that the following is true and correct.

In the Matter of

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

Jerk, LLC, a limited liability company,
also d/b/a JERK.. COM, and

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DOCKET NO. 9361

John Fanning, individually and
as a member of Jerk, LLC,

Respondents

[PROPOSED) ORDER

Upon consideration ofNon-Party Stripe, Inc.'s ("Stripe's") Motion for In Camera

Treatment, it is HEREBY ORDERED that the following documents are to be provided

permanent in camera treatment from the date of this Order in their entirety.

Exhibit ~' Document . ·-. .
Date Beginning Bates Ending Bates .<. . •. . .
No. Title/Description . . No. ... No. ·
CX0421 Account application 2012 STRIPEOOOO 10 STRIPE000017
dashboard

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Cx0422 Underwriting dashboard 2012-2014 STRIPE 000110 STRIPE 000195

ORDERED:

D. Michael Chappell
Chief Administrative Law Judge

Date: --~--------------