

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

05 24 2018
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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
SUPPLEMENTAL MOTION FOR IN CAMERA TREATMENT OF TRIAL EXHIBITS

National Industrialization Company (TASNEE), the National Titanium Dio
Company Limited, and Cristal USA Inc. (collectively, "Cristal") respectfully request tha
Court granin cameratreatment pursuant to 16 C.F.R. § 3.45(b) to certain proposed trial e:
that were not included in Cristal's initial motion forcameratreatment.

PUBLIC

Following Cristal's initial motion for camera

Exhibit Number	Categories of Confidential Information	Duration of In Camera Treatment	Reason for Inclusion in Supplemental Motion
PX0014	Confidential Financial Information and Forecasts; Business Plans and Competitive Strategy	0 years	Inadvertently Omitted
RX1118	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Confidential Information	5 years	Inadvertently Omitted
RX1119	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Confidential Information	10 years	Inadvertently Omitted
RX1331	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions	10 years	New or Modified Exhibit
RX1343	Litigation Protective Order	10 years	New or Modified Exhibit
RX1344	Production and Product Allocation Decisions	10 years	New or Modified Exhibit

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s E 184410 1002-110 25; 0 1.0019 -1 0 2540 TdTj 3.833 0 T0 Td (o)Tj 5.27 0 Td (r)Tj 3.833 0 Td ()Tj 2.875 .551 0 Td (a)

4 (0)Tj 3.110 TdTd (e)Tj 5.031 0 T22 0 Td (o)Tj 5.251 0 1b

Exhibit A TdTd 401 60 1b

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Exhibit A
Cristal Confidential Documents

RX1364	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information	10 years	New or Modified Exhibit
RX1365	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information	10 years	New or Modified Exhibit
RX1366	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information	10 years	New or Modified Exhibit
RX1367	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information	10 years	New or Modified Exhibit
RX1368	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information	10 years	New or Modified Exhibit
RX1369	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information	10 years	New or Modified Exhibit
RX1370	Confidential Financial Information and Forecasts; Production and Product Allocation Decisions; Cost Information	10 years	New or Modified Exhibit
RX1371	Production and Product Allocation Decisions; Cost Information	10 years	New or Modified Exhibit
RX1373	Customer-Specific Pricing Information; Product-Level Pricing Information; Pricing Strategy; Customer Negotiations and Internal Customer Strategy; Business Plans and Competitive Strategy	10 years	New or Modified Exhibit
RX1375	Customer-Specific Pricing Information; Pricing Strategy; Confidential Financial Information and Forecasts; Production and Product Allocation Decisions	10 years	New or Modified Exhibit
RX1376	Customer-Specific Pricing Information; Pricing Strategy; Confidential Financial Information and Forecasts; Production and Product Allocation Decisions	10 years	New or Modified Exhibit
RX1377	Customer-Specific Pricing Information; Pricing Strategy	5 years	New or Modified Exhibit
RX1399	F7S (g)22.645(N)5.96 (e8-14.1t)-4.076 (r)-14.176 (a)-1576 (r)-14.176 (a)-1.576 (t)-4.0389 (P)-8.152 (r)-14.1 ()-10.38 (I)7.518 3F6h676 (t		

**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 Respondents National Industrialization Company, the National Titanium Dioxide Company Limited, and Cristal USA I

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th of May, 2018, I filed the foregoing document electronically with:

Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue, N.W.,
Rm. H-113
Washington, DC 20580
secretary@ftc.gov

I also hereby certify that I caused a true and correct copy of the foregoing Supplemental Motion for In Camera Treatment of Trial Exhibits to be served upon the following via electronic mail.

/s/ Katherine E. Clemons
Rmretary@ftc.gov

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Notice of Electronic Service

I hereby certify that on May 24, 2018, I filed an electronic copy of the foregoing Respondent Cristal's Supplemental Motion for In Camera Treatment, with:

D. Michael Chappell
Chief Administrative Law Judge
600 Pennsylvania Ave., NW
Suite 110
Washington, DC, 20580

Donald Clark
600 Pennsylvania Ave., NW
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I hereby certify that on May 24, 2018, I served via E-Service an electronic copy of the foregoing Respondent Cristal's Supplemental Motion for In Camera Treatment, upon:

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I hereby certify that on May 24, 2018, I served via other means, as provided in 4.4(b) of the foregoing Respondent Cristal's Supplemental Motion for In Camera Treatment, upon:

Seth Weiner
