## UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSIC OFFICE OF ADMINISTRATIVE LAW JUDGE

In the Matter of Otto Bock HealthCare North America, Inc., a corporation Docket No. 9378 ORIGINAL PUBLIC DOCUMENT

23 2018

591640

Respondent.

## <u>FREEDOM'S SECOND MOTION FOR IN CAMERA TREATMENT</u> OF CERTAIN TRIAL EXHIBITS

Pursuant to Rule 3.45(b) of the Federal Trade Commission Rules of Practice, 16 C.F.R. § 3.45(b), the January 18, 2018 Scheduling Order ("Scheduling Order"),<sup>1</sup> the December 20, 2017 Protective Order Governing Confidential Material ("Protective Order"), and in response to Administrative Law Judge Chappell's July 2, 2018 Order on Freedom's First Motion for *In Camera* Treatment (the "July 2nd Order"), FIH Group Holdings, LLC ("Freedom") has substantially narrowed the exhibits for which it seeks *in camera* treatment. Freedom has conducted a complete and thorough review of every exhibit identified in Freedom's original motion for *in camera* treatment, and has followed the guidance of the July 2nd Order in doing so. In Freedom's original motion, it requested *in camera* treatment for 1016 exhibits. Through its comprehensive review and removal of duplicates,<sup>2</sup> Freedom has reduced the total number of exhibits requiring *in camera* treatment to 522, which is nearly 50% of its original request.<sup>3</sup>

<sup>&</sup>lt;sup>1</sup> As amended by Order dated April 26, 2018.

<sup>&</sup>lt;sup>2</sup> Freedom has removed any Ottobock-produced exhibits that also appear on Ottobock's second motion for *in camera* treatment.

<sup>&</sup>lt;sup>3</sup> The July 2nd Order reviewed Freedom's and Ottobock's Motions together. The July 2nd Order noted that the two Motions, combined, sought *in camera* treatment for 1,699 documents. After a comprehensive review and narrowing, Freedom's and Ottobock's Second Motions for *In Camera* Treatment only seek *in camera* treatment for

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Additionally, pursuant to the July 2nd Order, Freedom has designated the specific page and line numbers of deposition transcripts, lowered its request for the length of time of *in camera* treatment, and removed its current request for *in camera* treatment of the expert reports.

Freedom, by and through its counsel, hereby seeks *in camera* treatment for the remaining exhibits included in its original motion. These documents contain highly sensitive and proprietary information. Public disclosure of such information would result in Freedom's competitors obtaining Freedom's most sensitive and confidential business information, which, in the highly competitive market of prosthetic devices, would cause significant harm to Freedom's competitive position. Accordingly, Freedom respectfully requests an order requiring the designated materials to be used at the hearing only *in camera* and maintained under seal for a definite amount of time.

The documents and portions thereof for which Freedom seeks *in camera* treatment, upon thorough review of Complaint Counsel's and Respondent Counsel's Exhibit Lists,<sup>4</sup> satisfy the requirements for *in camera* treatment as set forth in Rule 3.45 and are consistent with applicable law of the Federal Trade Commission ("FTC" or the "Commission"). The information contained in the documents designated by Freedom is "sufficiently secret and sufficiently material to [Freedom's] business that disclosure would result in serious competitive injury." *In re General Foods Corp.*, 95 F.T.C. 352 (1980). Furthermore, this secret and material information warrants *in camera* treatment even when balanced against the "importance of the information in explaining the rationale of [the Commission's] decisions." *See id.* 

a combined 973 documents—reducing the total request by 726 documents, and which is 57% of the original requests.

<sup>&</sup>lt;sup>4</sup> Due to the Hold Separate and Asset Maintenance Agreement (the "Hold Separate Agreement"), attached hereto as Exhibit "D", Freedom has been held separate and apart from Ottobock and has not reviewed any documents belonging to any Ottobock custodian.

The exhibits and portions thereof at issue in this motion are listed in the table attached as Exhibit "A" and copies of the exhibits are attached (in CD format) as Exhibit "B". For ease of reference, Freedom has grouped the exhibits identified in the Exhibit "A" table into the following eight categories:

- 1. Business Plans & Strategies;
- 2. Contract Negotiations and Customer Contracts;
- 3. Intellectual Property, Proprietary Information and Trade Secrets;
- 4. Customer-Specific Documents;
- 5. Pricing and Cost Information;
- 6. Market Analysis Documents;
- 7. Sales and Financial Information; and
- 8. Multiple Category Documents.

The public exposure of the identified exhibits would result in a clearly defined, serious injury to Freedom. Freedom's motion for *in camera* treatment is fully supported by the sworn Declaration of Maynard Carkhuff attached hereto as Exhibit "C",<sup>5</sup> which analyzes the content of each individual exhibit listed in Exhibit "A".

#### I. INTRODUCTION

On December, 20, 2017, Complaint Counsel filed an Administrative Complaint (the "Complaint") against Otto Bock HealthCare North America, Inc. ("Ottobock" or "Respondent"). On May 18, 2018, Complaint Counsel provided to Respondent's Counsel its Final Proposed Exhibit List per Administrative Law Judge D. Michael Chappell's April 26, 2018 Fourth Revised

<sup>&</sup>lt;sup>5</sup> Pursuant to the July 2nd Order, to make "a stronger case" for the confidentiality of these exhibits, Freedom submits the declaration of Maynard Carkhuff, an employee with the requisite knowledge of the company.

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Scheduling Order. Complaint Counsel's Final Proposed Exhibit List included approximately 1,885 exhibits. Respondent's Final Proposed Exhibit List was provided to Complaint Counsel on May 29, 2018, and included approximately 1,050 exhibits.

Freedom has thoroughly reviewed each proposed exhibit originating from a Freedom custodian, or a third party custodian, that has been identified by either Complaint Counsel or Respondent Counsel to determine whether the confidential material included in the exhibits warrants *in camera* treatment. Freedom is aware of the important consideration the Commission places on disclosure of information to explain the rationale of its decisions. Freedom, however, is also aware that the Commission recognizes the need for parties (and nonparties) to protect confidential business information, the disclosure of which would result in serious competitive injury. *See In re OSF Healthcare Sys. & Rockford Health Sys.*, 2012 WL 1355598, at \*3 (F.T.C. Mar. 29, 2012). Accordingly, Freedom has narrowly tailored its request for *in camera* treatment to only that information that is sufficiently secret and material consistent with the Court's guidance for determining *in camera* treatment. Freedom has identified 522 exhibits that require *in camera* treatment.

#### II. ARGUMENT

The Commission's Rules and precedent allow for *in camera* treatment of Freedom's identified exhibits. Due to the highly sensitive and confidential nature of the identified exhibits, and the clearly defined, serious injury Freedom would suffer if its contents became public, the identified exhibits should be afforded *in camera* treatment.

#### A. Legal Standard

Commission Rule 3.45(b) provides that the "Administrative Law Judge shall order that such material [set forth in a motion to obtain *in camera* treatment] be placed *in camera* only after finding that its public disclosure will likely result in a clearly defined, serious injury to the

person, partnership, or corporation requesting *in camera* treatment." 16 C.F.R. § 3.45(b). A ruling on *in camera* treatment, "like other questions relating to the proper, fair, and expeditious conduct of adjudicative hearings[,] is a matter within the sound discretion of the administrative law judge." *In re Bristol-Myers Co.*, 90 F.T.C. 455, 457 (1977).

To demonstrate that *in camera* treatment is warranted, the movant must establish that the information is "sufficiently secret and sufficiently material to the [proponent's] business that disclosure would result in serious competitive injury," and then balance that factor against the "importance of the information in explaining the rationale of the [Commission's] decisions." *General Foods Corp.*, 95 F.T.C. at 352 (citing *Bristol-Myers Co.*, 90 F.T.C. at 455). In *Bristol-Myers*, the Commission set forth six factors to weigh in considering whether information is sufficiently secret and material:

(1) the extent to which the information is known outside of his business;
 (2) the extent to which it is known by employees and others involved in his business;
 (3) the extent of measures taken by him to guard the secrecy of the information;
 (4) the value of the information to him and to his competitors;
 (5) the amount of effort or money expended by him in developing the information;
 (6) the ease or difficulty with which the information could be properly acquired or duplicated by others.

*Bristol-Myers Co.*, 90 F.T.C. 455 (1977) (citing Restatement of Torts § 757, Comment b at 6 (1939)).

The Commission has previously "recognized that it may be appropriate to provide *in camera* treatment for business records to be introduced as evidence . . . , such as business strategies, marketing plans, pricing policies, or sales documents." *OSF Healthcare Sys.*, 2012 WL 1355598, at \*3 (holding that such business records are typically afforded two to five years of *in camera* treatment). The Commission has previously held that the "likely loss of business advantages is a good example of a 'clearly defined, serious injury." *In re Hoechst Marion Roussel, Inc.*, 2000 FTC LEXIS 138, \*6 (F.T.C. Sept. 19, 2000).

## B. <u>The Final Proposed Exhibits Subject to this Motion Meet the Standard for *In* <u>Camera Treatment Because Their Public Disclosure Would Result in Serious,</u> <u>Clearly Defined Injury to Freedom.</u></u>

For each of the categories of documents set forth by Freedom, the information sought to be afforded *in camera* treatment is sufficiently secret and material, and the secrecy and materiality outweigh the importance of the information in explaining the rationale of the Commission's decision. *See General Foods Corp.*, 95 F.T.C. at 352. The Commission has previously recognized that the type of information contained within each of Freedom's identified categories of documents deserve *in camera* treatment.

All six *Bristol-Myers* factors support Freedom's motion for *in camera* treatment. First, as a private company, none of the aforementioned information is known outside of Freedom, aside from documents between Freedom and contracting parties. Second, the information contained in these documents are only disclosed to certain Freedom employees on a need-to-know basis, and is only shared with non-Freedom individuals that are in a contractual relationship with Freedom. Third, Freedom requires its employees to sign non-disclosure and confidentiality agreements to maintain the secrecy of this information. Fourth, the documents at issue contain highly secret and material information, such that disclosure would result in serious injury to Freedom and would be advantageous to Freedom's competitors at Freedom's (and potentially its customers') expense. Fifth, Freedom expends a great amount of time and resources into developing its business strategies, which are key to its competitiveness in the prosthetics marketplace. Sixth, it would be nearly impossible for a non-party to properly acquire or duplicate the information contained in the documents at issue because these documents were kept confidential by Freedom. Disclosure of this information would create a "likely loss of business advantage," resulting in a "clearly defined, serious injury." See Hoechst Marion Roussel, Inc., 2000 FTC LEXIS 138, at \*6. Moreover, due to the Hold Separate Agreement, Freedom is essentially a nonparty to this

adjudication, and deserves "special solicitude" in its request for *in camera* treatment of its confidential business information. *See In re Kaiser Aluminum & Chem. Corp.*, 103 FTC 500, 500 (1984). It is therefore both appropriate and proper for the Commission to grant *in camera* treatment to the exhibits identified by Freedom.

As described in the attached Carkhuff Declaration, the documents at issue fall into seven distinct categories, with an eighth category containing documents that fall into multiple categories. The following chart lists each category of materials, the applicable paragraph discussing the category in the Carkhuff Declaration, and the time period for which Freedom requests *in camera* treatment.

<b>Category of Confidential Information</b>	<b>Declaration</b>	Time Period
Business Plans and Strategies	¶ 8	5 Years
Contract Negotiations and Customer Contracts	¶ 9	5 Years
Intellectual Property, Proprietary Information and Trade Secrets	¶ 10	Indefinite
Customer-Specific Information	¶ 11	5 Years
Pricing and Cost Information	¶ 12	3 Years
Market Analysis Information	¶ 13	5 Years
Sales and Financial Information	¶ 14	5 Years

If a document falls within multiple categories, Freedom requests that the category carrying the longest time period of *in camera* treatment apply.

#### 1. <u>Business Plans and Strategies</u>

Freedom seeks *in camera* treatment for documents containing business plans and strategies. This type of information has previously been held by the Commission to deserve *in* 

*camera* treatment. *See Union Oil Company of California*, 2004 WL 2458848, at \*3 (F.T.C. Oct. 7, 2004) (granting motion for *in camera* treatment of "business planning" information); *Champion Spark Plug Co.*, 1982 FTC LEXIS 85 (F.T.C. Apr. 5, 1982) (granting *in camera* treatment for documents containing "overall business plans and strategies" for five years). The disclosure of these documents would harm Freedom by revealing to competitors Freedom's current and future business plans to improve its business. Allowing Freedom's competitors access to this information would allow them to see Freedom's future plans in the market and possibly make anticipatory decisions before Freedom can complete its plan, thereby undermining Freedom's plans for growth. Accordingly, Freedom requests that this information remain *in camera* for a period of five years. *See In the Matter of Tronox Ltd.*, 9377, 2018 WL 2336017, at \*1 (F.T.C. May 15, 2018) (granting *in camera* treatment for a period of ten years for documents containing *in camera* treatment for a period of ten years for documents containing respondent's "business plans").

#### 2. <u>Contract Negotiations and Customer Contracts</u>

Additionally, Freedom has identified certain documents containing contracts and negotiations with customers that are deserving of *in camera* treatment. Similar documents have previously been granted *in camera* treatment by the Commission. *See In re OSF Healthcare Sys.*, 2012 WL 1355598, at \*3 (granting motion for *in camera* treatment for "contracts with [customers] and negotiations with [customers]"). Freedom enjoys many different customer relationships, which include varying types of contracts with those customers. Disclosure of such information would harm Freedom's customer relationships and undermine Freedom's ability to negotiate in the future. Freedom's relationships with certain customers could suffer if they learned that other customers entered into contracts with Freedom with different terms. Accordingly, Freedom requests that this information remain *in camera* for a period of five years.

*In re Evanston Nw. Healthcare Corp., & Enh Med. Grp., Inc.,* 2005 WL 1541539, at \*2 (F.T.C. June 1, 2005) (granting *in camera* treatment, for a period of ten years, for "information related to contract negotiations and rates").

#### 3. Intellectual Property, Proprietary Information, and Trade Secrets

Freedom requests *in camera* treatment for documents containing intellectual property, proprietary information and trade secrets, such as highly confidential technical information created at great expense to produce Freedom's prosthetic devices. Information that is "highly proprietary and sensitive" is sufficient grounds for extending *in camera* protection. *In re E.I. Dupont De Nemours & Co.*, 97 F.T.C. 116 (1981); *see also In re Union Oil Company of California*, 2004 WL 3142853, at \*1 (F.T.C. Nov. 22, 2004) (granting indefinite *in camera* treatment for "trade secrets, such as secret formulas, processes, and other secret technical information"). Accordingly, Freedom requests that this information remain *in camera* indefinitely. *See In the Matter of Tronox Ltd. A Corp*, 9377, 2018 WL 2336017, at \*1 (F.T.C. May 15, 2018) (granting indefinite *in camera* treatment for documents containing "trade secrets").

#### 4. <u>Customer-Specific Information</u>

The Final Proposed Exhibit Lists contain documents setting forth customer-specific information, which has also been held by the Commission to be deserving of *in camera* treatment. *See Polypore Int'l, Inc.*, 2009 WL 1499350, at \*4 (F.T.C. May 13, 2009) (granting *in camera* treatment to "customer-specific documents"). Freedom has developed relationships with many different customers over the years. **{ Redacted – Subject to Pending Motion for In Camera Treatment }.** Accordingly, Freedom requests that this highly sensitive information remain *in camera* for five years. *See In the Matter of Tronox Ltd. A Corp.*, 9377, 2018 WL

2336017, at \*1 (F.T.C. May 15, 2018) (granting *in camera* treatment for a period of ten years for "customer-specific price and volume information").

#### 5. Pricing and Cost Information

Documents containing pricing strategy and cost information have been granted *in camera* treatment because disclosure is likely to give unfair competitive advantages to competitors. *See In re Mcwane, Inc., & Star Pipe Products, Ltd., A Ltd. P'ship,* 2012 WL 3862131, at \*3 (F.T.C. Aug. 17, 2012) (granting *in camera* treatment to documents containing "pricing and cost information"); *In re Polypore Int'l, Inc.,* 2009 WL 1499350, at \*4 (F.T.C. May 13, 2009) (granting *in camera* treatment to "costing data"); *In re E.I. Dupont De Nemours & Co.,* 97 F.T.C. 116 (1981) (granting *in camera* treatment to "certain lists of prices" because they would "assist its competitors if released").

Freedom seeks *in camera* treatment for documents containing generic price and cost information of its products, as opposed to the customer-specific information in Category 4. The disclosure of Freedom's prices and/or costs of its products would damage its relationship with its customers, its negotiating power with customers, and assist competitors by providing them with vital information that Freedom has thus far remained confidential. { **Redacted – Subject to Pending Motion for In Camera Treatment }.** Accordingly, Freedom requests that this information remain *in camera* for three years. *See In the Matter of Tronox Ltd. A Corp., et al, Respondents.*, 9377, 2018 WL 2336017, at \*1 (F.T.C. May 15, 2018) (granting *in camera* treatment for a period of five years for "aggregated price and volume information").

#### 6. <u>Market Analysis Documents</u>

Freedom seeks *in camera* treatment for documents containing market analysis, which have previously been granted *in camera* treatment by the Commission. *See Polypore Int'l, Inc.*,

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2009 WL 1499350, at \*4 (F.T.C. May 13, 2009) (granting *in camera* treatment to "market analysis" information); *Evanston Nw. Healthcare Corp., & Enh Med. Grp., Inc.*, 2005 WL 1541539, at \*2 (F.T.C. June 1, 2005) (granting *in camera* treatment to information including "market analysis"). Freedom's market analyses are commercially valuable to Freedom's competitors and customers, and are inherently material to its business. Freedom's market analyses are valuable to its competitive position in the market and provide an insight into Freedom's future plans to better compete in the market. For instance, Freedom's market analyses may provide a competitor with weaknesses of a product or voids in a market, which a competitor can use in its marketing or to create a new product to fill that void. The value of this information to Freedom's competitors is similar to that of Freedom's business plans and strategies. Accordingly, Freedom requests that this information remain *in camera* for five years. *See In the Matter of Tronox Ltd. A Corp., et al, Respondents.*, 9377, 2018 WL 2336017, at \*1 (F.T.C. May 15, 2018) (granting *in camera* treatment for a period of ten years for documents containing respondent's "business plans").

#### 7. <u>Sales and Financial Information</u>

Freedom seeks *in camera* treatment sales and financial information, which have also been granted *in camera* treatment by the Commission. *See In re ECM Biofilms, Inc., A Corp., Also d/b/a Enviroplastics Int'l,* 2014 WL 3974607, at \*1 (F.T.C. Aug. 4, 2014) (granting *in camera* treatment to "financial information"). Freedom's sales data and financial information are commercially valuable to Freedom's competitors and customers, and are inherently material to its business. Disclosure of this information would undermine Freedom's negotiating power with customers and would allow competitors to obtain valuable insight into Freedom's business. For example, some of Freedom's financial and sales documents segment its sales by each customer,

which would allow competitors to see Freedom's strongholds or where Freedom's support was wavering. Accordingly, Freedom requests that this information remain *in camera* for five years. *See In the Matter of Impax Labs., Inc.,* 2017 WL 4948988, at \*1 (F.T.C. Oct. 23, 2017) (granting *in camera* treatment for documents containing "financial and sales projections" for ten years).

#### 8. <u>Multiple Categories</u>

In addition to the aforementioned documents, some proposed exhibits contain two or more types of information warranting *in camera* treatment. As stated above, for these documents, Freedom seeks *in camera* treatment for the longer applicable period of time.

## C. <u>In Camera Treatment is Warranted for Certain Exhibits that are More Than</u> <u>Three Years Old.</u>

Pursuant to the July 2nd Order, Freedom has substantially reduced the number of exhibits more than three years old, for which it seeks *in camera* treatment. Freedom's original motion contained 46 exhibits more than three years old; however, Freedom has removed 41 exhibits— eliminating approximately 89% of those exhibits for which Freedom originally sought *in camera* protection. The remaining exhibits contain information that remains competitively sensitive, including customer-specific pricing information that could be used against Freedom in future negotiations, as well as projections that proceed past 2018, which would provide competitors with an insight into Freedom's strategies moving forward. Such documents include pricing that was given to different customers, which could, to this day, still disrupt Freedom's customer relationships if they found out they paid higher prices than other customers. *See* Ex. C, Carkhuff Decl.

## D. <u>In Camera Treatment is Warranted for Highly Confidential Freedom</u> Information Contained within Ottobock-produced Documents.

Additionally, for all of the aforementioned reasons, to the extent that any highlyconfidential Freedom information is contained within Ottobock's documents created during the due diligence and/or pre-Hold Separate Agreement periods, Freedom requests that *in camera* treatment be granted for its information.

## E. <u>In Camera Treatment is Also Warranted for Possible Trial Testimony by</u> <u>Freedom's Witnesses.</u>

Both Respondent and Complaint Counsel have designated several Freedom employees as potential trial witnesses. If called upon, it is likely that Freedom's employees will be questioned about the topics covered by this motion. Testimony on any of these topics could result in the disclosure of the same information contained in the documents described above. Accordingly, Freedom requests that any trial testimony, either upon direct examination or cross examination by either party on any of these topics, be subject to *in camera* treatment for a period of three (3) to five (5) years from the date of this motion.

## F. <u>Pursuant to the July 2nd Order, Freedom Will Prepare an *In Camera* Version of its Expert Reports Based on the Outcome of the Pending Motions for *In Camera* Treatment.</u>

In the July 2nd Order, Judge Chappell held that only "once the orders on pending *in camera* treatment motions are issued, the parties shall prepare two versions of their expert reports." Accordingly, Freedom does not include the expert reports in its Motion, but reserves the right to prepare *in camera* versions of the expert reports once the orders on pending *in camera* motions are issued.

## III. CONCLUSION

For the foregoing reasons, and those contained in the Declaration of Maynard Carkhuff, Freedom respectfully requests that this Court grant *in camera* protection to all documents identified in Exhibit "A" and any trial testimony pertaining to the information contained in the documents in Exhibit "A".

Dated: July 23, 2018

Respectfully submitted,

/s/ Andrew J. Rudowitz Wayne A. Mack Edward G. Biester III Sean S. Zabaneh Sean P. McConnell Sarah Kulik William Shotzbarger Andrew J. Rudowitz Duane Morris LLP 30 South 17<sup>th</sup> Street Philadelphia, PA 19103-4196 Telephone: (215) 979-1000 Fax: (215) 979-1020 WAMack@duanemorris.com EGBiester@duanemorris.com SSZabaneh@duanemorris.com SPMcConnell@duanemorris.com SCKulik@duanemorris.com WShotzbarger@duanemorris.com AJRudowitz@duanemorris.com

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## UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of Otto Bock HealthCare North America, Inc., a corporation

Docket No. 9378

PUBLIC

Respondent.

## **PROPOSED ORDER**

Upon consideration of Freedom's Second Motion for *In Camera* Treatment of Certain Trial Exhibits (the "Motion"), any opposition thereto, any hearing thereon, and the entire record in this proceeding,

IT IS HEREBY ORDERED, that Freedom's Motion is GRANTED.

IT IS FURTHER ORDERED, that pursuant to Rule 3.45(b) of the Federal Trade

Commission Rules of Practice, 16 C.F.R. § 3.45(b), the documents identified in the index attached as Exhibit A to the Motion, and any related trial testimony, shall be subject to the requested *in camera* treatment and will be kept confidential and not placed on the public record of this proceeding.

Date: \_\_\_\_\_

D. Michael Chappell Administrative Law Judge

# **EXHIBIT** A

## **PUBLIC**

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX00754	4/18/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX00755	4/18/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX00757	3/27/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX00758	2/20/2017	{Redacted}	{Redacted}	Pricing and Cost Information	Freedom	Partial (p. 2)		3 Years
PX00760	3/24/2016	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX00761	2/26/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX00762	4/18/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Partial (pp. 2- 11)		5 Years
PX00763		{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX00764		{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX00765	12/18/2015	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX00767		{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX00772	3/24/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX00774	8/17/2015	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX00775	8/24/2016	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
PX00780	12/15/2017	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Partial (p. 2)		5 Years
PX00781	12/14/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX00782	12/9/2015	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX00785	1/1/2018	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX00786	1/1/2018	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX00789	1/18/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX00790	10/21/2015	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX00791		{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX00794	12/9/2016	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX00795	9/23/2016	{Redacted}	{Redacted}	Pricing and Cost Information	Freedom	Complete		3 Years
PX00796	12/13/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information	Freedom	Complete		5 Years
PX00798	1/11/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX00799	3/30/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX00800	10/6/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX00801	1/1/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX00802		{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
PX00804	1/4/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX00808	1/1/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX00809	12/20/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX00817	1/19/2018	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX00821	2/17/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX00822	4/11/2016	{Redacted}	{Redacted}	Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX00828	8/7/2017	{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX00832	9/6/2017	{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX00833	9/2/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX00834	2/5/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Partial		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX00838	1/5/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX00839	1/5/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX00840	1/9/2018	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX00860	2/16/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents	Freedom	Complete		5 Years
PX00862	3/30/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX00863	12/6/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information	Freedom	Complete		5 Years
PX01029	3/4/2016	{Redacted}	{Redacted}	Market Analysis Documents	Freedom	Partial (pp. 2- 3)		5 Years
PX01032		{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom	Complete		Indefinite
PX01033	8/15/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01034	8/13/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01035	8/13/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom	Complete		Indefinite
PX01037	8/14/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		Indefinite
PX01039	8/17/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information; For Further Review	Freedom & Ottobock	Complete		Indefinite
PX01040	8/8/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01041	7/27/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01042	4/18/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01043	11/11/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		Indefinite
PX01044	11/13/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01045	5/6/2016	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom	Complete		Indefinite
PX01046	11/17/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		Indefinite
PX01047	10/11/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom	Complete		Indefinite
PX01048	10/10/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01050	3/10/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01051	10/12/2015	{Redacted}	{Redacted}	Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01052	5/12/2016	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom	Complete		Indefinite
PX01053	7/16/2015	{Redacted}	{Redacted}	Customer-Specific Documents; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01069	7/26/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents	Freedom	Partial (p. 2)		5 Years
PX01073	10/25/2016	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01075	1/19/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01079	4/4/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01080	3/8/2016	{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01089	10/19/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01102	6/15/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01104	5/3/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01105	4/24/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01106	3/13/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01108	2/3/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01109	1/7/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01114	5/31/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		Indefinite
PX01115	1/12/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01116	11/6/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01117	11/13/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
PX01118	7/31/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information	Freedom	Complete		Indefinite
PX01120	7/27/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01122	9/19/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01124	4/15/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01125	5/24/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01126	10/17/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information	Freedom	Complete		Indefinite
PX01127	10/4/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01129	1/22/2018	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information	Freedom	Complete		Indefinite
PX01132	11/13/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01133	11/13/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
PX01136	5/18/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01137	7/27/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01139	12/15/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01140	5/22/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01142	1/23/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01143	2/20/2016	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01144	3/16/2016	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01146	3/21/2016	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01147	7/21/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information	Freedom	Complete		Indefinite
PX01148	10/9/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01149	2/20/2016	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01154	6/7/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Market Analysis Documents	Freedom	Complete		5 Years
PX01155		{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
PX01156	11/10/2017	{Redacted}	{Redacted}	Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01157	7/17/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01159	4/18/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
PX01160	4/19/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01162	10/15/2015	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01164	8/17/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01171	5/8/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		Indefinite
PX01174		{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01175		{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01185	7/18/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom	Complete		Indefinite
PX01187	7/12/2017	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts	Freedom	Complete		5 Years
PX01188	6/14/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01189	2/9/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01192	7/14/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01193	3/23/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		Indefinite
PX01194	10/30/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01195	10/25/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01196	10/17/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01197	10/19/2017	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
PX01198	10/5/2017	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information	Freedom	Complete		Indefinite
PX01202	10/18/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Contract Negotiations and Customer Contracts; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01203	10/3/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01205	1/15/2018	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
PX01208	8/8/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		Indefinite
PX01217	11/3/2017	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
PX01218	9/19/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite
PX01220	11/29/2017	{Redacted}	{Redacted}	Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01221	12/1/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		Indefinite
PX01222	1/3/2018	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01227	6/28/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite
PX01228	1/1/2018	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01232	1/27/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01233	5/19/2017	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts; Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01234	5/16/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01237	4/7/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01239	12/8/2016	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Partial (p. 2)		5 Years
PX01241	10/14/2016	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01243	12/1/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
PX01244	9/22/2016	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01249	11/30/2015	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01255		{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Freedom; Ottobock	Freedom & Ottobock	Complete		5 Years
PX01285	7/6/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Contract Negotiations and Customer Contracts	Freedom	Complete		5 Years
PX01286	7/3/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Partial (pp. 1- 2)		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01289	8/11/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Contract Negotiations and Customer Contracts; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01290	7/31/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		Indefinite
PX01293	6/6/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01295	3/27/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01311	7/7/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01312	8/4/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01313	9/7/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01314	10/4/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01315	11/3/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01318	3/16/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
PX01321	2/12/2018	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Partial (p. 1)	1	5 Years
PX01388	12/1/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite
PX01389	10/2/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01390	11/1/2017	{Redacted}	{Redacted}	Market Analysis Documents	Freedom	Complete		5 Years
PX01393	1/13/2018	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01394	1/16/2018	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01396	1/24/2018	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
PX01397	1/10/2018	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
PX01399	1/22/2018	{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01401	1/22/2018	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
PX01409	1/25/2018	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01411	10/17/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01413	11/10/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information	Freedom & Ottobock	Complete		5 Years
PX01418	11/30/2017	{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01420	11/29/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01422	12/5/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
PX01426	8/1/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01427	5/10/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01428	8/29/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01429	10/20/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01431		{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01432		{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01434		{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01435	6/5/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
PX01439	11/6/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01441	12/6/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01443	2/1/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01444	8/31/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01455	11/3/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Partial (p. 2)		5 Years
PX01460	4/5/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01477	9/6/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01500	1/21/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01501	6/29/2017	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
PX01502	3/20/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01611	10/7/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information	Freedom	Complete		Indefinite
PX01641	6/8/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01642	3/30/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01643	8/14/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01644	4/6/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01645	3/30/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01646	7/15/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01647	8/28/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01648	9/7/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01649	7/26/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01650	7/15/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX01651	7/17/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01652	8/8/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01656	4/20/2017	{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01657	3/24/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01658	1/30/2017	{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01659	9/12/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01660	3/12/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01661	4/18/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01662	8/1/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01663	3/27/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01664	7/27/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01665	8/17/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
PX01667	5/10/2016	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01670	8/28/2017	{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01671	7/26/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01672	9/22/2017	{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01673	9/22/2017	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom & Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01674	11/27/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
PX01676	4/4/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01678	8/3/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01680	1/10/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01681	2/12/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
PX01682	7/17/2015	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01685	4/7/2016	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01687	7/6/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01695	7/13/2016	{Redacted}	{Redacted}	Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01697	9/2/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01698	9/22/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01701	12/13/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information	Freedom	Complete		5 Years
PX01837	5/26/2017	{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01842	8/12/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01843	7/31/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom	Complete		Indefinite
PX01844	12/19/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01845	4/20/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01847		{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom	Complete		Indefinite
PX01849	5/18/2016	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
PX01850	7/19/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01853	1/22/2018	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
PX01944	6/26/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Contract Negotiations and Customer Contracts; Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01959	3/13/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01961	1/29/2018	{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01962	1/26/2018	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite
PX01964	11/4/2015	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite
PX01965	12/11/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01966		{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts; Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX01967	6/23/2017	{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information; Freedom	Freedom	Complete		5 Years
PX01968	1/4/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information; Freedom	Freedom	Complete		5 Years
PX01975		{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		Indefinite
PX01977	2/7/2018	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
PX01979	10/30/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01980	11/7/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01981	6/8/2017	{Redacted}	{Redacted}	Pricing and Cost Information	Freedom	Complete		3 Years
PX01983	2/9/2017	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX01988	1/5/2016	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite
PX01989	5/20/2015	{Redacted}	{Redacted}	Customer-Specific Documents; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
PX01991	1/19/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
PX01996	6/14/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
PX02001	6/1/2017 0:00		{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite
PX02003	8/1/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX02004	4/6/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Contract Negotiations and Customer Contracts; Sales and Financial Information	Freedom	Complete		5 Years
PX02005		{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Complete		Indefinite
PX02008	9/7/2017 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
PX02023 R	4/20/2017 0:00		{Redacted}	Contract Negotiations and Customer Contracts; Sales and Financial Information	Freedom	Complete		5 Years
PX02024	3/24/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Partial (p. 5 & 6 of 8)		5 Years
PX02026	1/30/2017 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
PX02027	2/3/2017 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
PX02028	9/12/2017 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
PX02029	2/14/2017 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
PX02030	2/16/2017 0:00		{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX02031	3/12/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Sales and Financial Information;	Freedom	Complete		Indefinite
PX02034								5 Years
HEP0029 43	3/27/2017 0:00	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		
PX02034 R	3/27/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite
ĸ	3/21/2017 0.00	{Redacted}	{Revacteu}	Sales and Financial	Freedom	Complete		5 Years
PX02037	8/4/2017 0:00	{Redacted}	{Redacted}	Information;	Freedom	Complete		Jiedis
PX02048	5/26/2016 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Complete		5 Years
		(Iteauceu)	(Iteaucrea)	Sales and Financial				5 Years
PX02052	8/28/2017 0:00	{Redacted}	{Redacted}	Information;	Freedom	Complete		
PX02053	7/26/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Contract Negotiations and Customer Contracts	Freedom	Partial (p. 2, 3)		5 Years
PX02054	9/5/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Contract Negotiations and Customer Contracts	Freedom	Partial (p.3)		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX02056	9/22/2017 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
PX02057	4/6/2017 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
PX02058	9/22/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Contract Negotiations and Customer Contracts	Freedom	Complete		5 Years
PX02066	9/28/2016 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
PX02068	12/16/2016 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information;	Freedom	Complete		5 Years
PX02069	3/13/2017 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
PX02075	7/20/2016 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX02077	9/28/2016 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
PX02079	1/13/2017 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
PX02080	12/19/2016 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX02081	1/13/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
PX02087	4/4/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Partial (p.1)		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
				Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Sales and				Indefinite
PX02089	4/20/2017 0:00	{Redacted}	{Redacted}	Financial Information	Freedom	Complete		
PX02102	12/7/2016 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
PX02104	11/21/2016 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information;	Freedom	Complete		5 Years
PX02109		{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts	Freedom	Complete		5 Years
PX02111		{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts;	Freedom	Complete		5 Years
PX02112	6/13/2017 0:00	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts;	Freedom	Complete		5 Years
PX02119	4/4/2017 0:00	{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information;	Freedom	Complete		5 Years
PX02122		{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts; Sales and Financial Information;	Freedom	Complete		5 Years
		(	(	Business Plans & Strategies;				5 Years
PX02124	7/8/2016 0:00	{Redacted}	{Redacted}	Pricing and Cost Information;	Freedom	Complete		
PX02125	9/7/2017 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
PX03016	10/20/2016 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX03041	10/19/2016 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Contract Negotiations and Customer Contracts; Sales and Financial Information	Freedom	Complete		5 Years
PX03041	7/29/2017 0:00	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts	Freedom	Complete		5 Years
PX03055	8/16/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		5 Years
PX03056	6/22/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Contract Negotiations and Customer Contracts	Freedom	Complete		5 Years
PX03059	2/15/2017 0:00	{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
PX03060	5/26/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information;	Freedom	Complete		5 Years
PX03115	3/1/2017 0:00	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information;	Freedom			5 Years
PX03236	6/22/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX03237	6/22/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Complete		Indefinite
PX03275	7/6/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
PX03279	7/21/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information;	Freedom	Complete		5 Years
PX03280	7/21/2017 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
				Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market			9:18 - 10:1, 13:8 - 14:22, 27:19 - 29:4, 29:11-30:7, 31:24-33:7, 35:14- 24, 37:3 - 6, 45:4- 12, 45:22-60:4, 67:16 - 68:19, 71:8-5, 96:17 - 98:1, 106:25 - 107:10, 110:13 - 121:25, 123:7- 130:3, 131:16 - 25, 133:11 - 136: 14, 142:6 - 12, 144:14 - 153:2, 154:16 - 156:14, 158:10 - 159:2, 164:6 - 168:1, 168:20-174:8, 179:20-183:5. 184:7-186:2, 188:22 - 190:2, 191:12 - 192:5, 197:1 - 199:2, 201:1 - 203:9, 207:	10 Years
PX05005	12/1/2017 0:00	{Redacted}	{Redacted}	Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Partial	9 - 209:7, 213:1 - 214:18, 221:1 -	

Exhibit 1 Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
				Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing			12: 7 - 16: 6 17: 17 - 19: 20 20: 4 - 21: 2 22: 15 - 23: 2 24: 1 - 12 25: 24 - 27: 16 29: 2 - 32: 12 33: 7 - 36: 21 38: 14 - 43: 3 43: 23 - 47: 11 48: 3 - 63: 1 64: 12 - 84: 10 85: 8 - 87: 7 87: 22 - 88: 22 90: 1 - 93: 5 93: 19 - 96: 20 97: 6 - 99: 21 100: 4 - 101: 7 102: 17 - 105: 8 105: 18 - 110: 5 112: 1 - 113: 7	10 Years
PX05006	12/5/2017 0:00	{Redacted}	{Redacted}	and Cost Information; Sales and Financial Information;	Freedom	Partial	115: 10 - 120: 6	

Exhibit T Number	rial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
				Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing			24: 7 -26: 17, 63: 24 - 64: 15, 79: 15 - 80: 2, 90: 13 - 91: 8, 101: 14 - 106: 14, 109: 1 - 111: 23, 112: 12 -113: 11, 115: 23 -122: 2, 137: 4 -138: 24, 149: 10 - 150: 5154: 16 - 155: 1, 156: 15 - 157: 2, 163: 23 - 164: 15, 166: 20 - 168: 4 169: 10 - 171: 1, 172: 22 - 173: 4 177: 25 - 178: 12, 216: 14 - 219: 18, 222: 25 - 224: 12, 226: 7 - 227: 22, 229: 8 - 233: 19, 235: 18 - 237: 2, 239: 18 - 240: 4, 243: 9 -270: 23, 273: 18 - 279: 2, 287: 6 - 296: 8,	10 Years
PX05007	12/5/2017 0:00	{Redacted}	{Redacted}	and Cost Information; Sales and Financial Information;	Freedom	Partial	300: 11 -303: 11, 304: 24 -311: 4	

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
				Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales			17:19 - 19:10, 33:13 - 18, 35:15 - 20, 36:16 - 37:6, 43:18 - 45:14, 45:22 - 48:22, 60:21 - 64:18, 68:2 - 21, 71:2 - 74:1, 83:2 - 84:19, 106:22 - 108:10, 108:16 - 110:2, 110:3 - 20, 113:3 - 8, 113:9 - 117:25, 120:6 - 121:5, 126:2 - 15, 136:15 - 22, 140:18 - 141:22, 143:24 - 145:11, 145:22 - 147:25, 152:3 - 153:15, 154:23 - 161:9, 162:10 - 166:5, 171:24 - 172:15, 175:4 - 12, 175:13 - 176:10, 181:2 - 19, 185:21 - 187:9, 187:10 - 20	
PX05103	1/31/2018 0:00	{Redacted}	{Redacted}	and Financial Information;	Freedom	Partial		

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05109	3/13/2018 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Partial	30:11-31:4, 34:7- 35:24, 35:25-38:9, 42:6-44:25, 45:1- 5, 46:11-48:23, 48:24-55:25, 56:4- 59:23, 60:2-61:9, 61:15-64:1, 64:12- 72:23, 74:5-11, 83:11-84:11, 116:12-119:1, 122:16-127:22, 132:14-136:9, 138:19-142:23, 146:15-153:14, 154:18-157:25, 159:5-160:15, 162:9-193:16, 194:19-242:22, 248:12-250:4	10 Years
PX05110	3/13/2018 0:00		{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Partial	87:23 - 88:8, 88:9 - 90:9, 115:6 - 119:8, 126:24 - 127:11, 127:12 - 130:5, 184:19 - 188:3	10 Years

Exhibit 1 Number	rial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
				Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales			11: $14 - 21$ 11: $25 - 12: 11$ 12: $25 - 13: 15$ 14: $13 - 22$ 15: $24 - 16: 2$ 16: $12 - 18$ 17: $16 - 21$ 18: $9 - 18$ 19: $17 - 20$ 20: $1 - 4$ 20: $5 - 8$ 20: $20 - 25$ 21: $19 - 22$ 23: $18 - 24: 17$ 25: $1 - 9$ 25: $15 - 26: 2$ 26: $9 - 18$ 27: $12 - 21$ 28: $12 - 15$ 28: $24 - 29: 14$ 31: $12 - 19$ 32: $10 - 17$ 34: $9 - 17$ 35: $17 - 36: 22$ 36: $23 - 37: 18$	10 Years
PX05111	3/13/2018 0:00	{Redacted}	{Redacted}	and Financial Information;	Freedom	Partial	37: 22 - 41: 19	

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05112	3/15/2018 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Partial	23:1-29:25, 44:1- 57:25, 68:1-72:25, 80:1-82:25, 151:1- 152:25, 157:1- 158:25, 171:1- 17:25, 174:1- 176:25, 178:1- 180:4, 187:1-25, 192:1-25, 203:1- 208:25	10 Years
PX05113	3/16/2018 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Partial	115: 24 - 116: 18	10 Years
PX05114	3/16/2018 0:00		{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Partial	35: 23 – 25, 40: 22 - 42: 6, 72: 8 – 24, 73: 18 - 74: 19, 90: 19 - 92: 19, 94: 6 - 95: 7, 95: 20 - 97: 14, 104: 10 - 105: 8, 105: 9 - 111: 18, 122: 19 - 132: 16, 187: 16 - 189: 10	

Exhibit T Number	rial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
				Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing			8: $15 - 9: 4$ 8: $15 - 10: 4$ 11: $24 - 12: 1$ 17: $7 - 18: 5$ 20: $24 - 23: 10$ 24: $12 - 33: 7$ 37: $17 - 40: 18$ 43: $2 - 46: 20$ 47: $3 - 62: 1$ 62: $11 - 66: 1$ 67: $9 - 70: 12$ 70: $20 - 86: 17$ 86: $23 - 87: 4$ 87: $19 - 94: 13$ 95: $2 - 100: 16$ 101: $21 - 103: 16$ 104: $6 - 107: 19$ 108: $21 - 110: 4$ 110: $16 - 111: 12$ 113: $21 - 118: 2$ 118: $15 - 119: 2$ 120: $13 - 121: 2$ 120: $13 - 121: 2$ 120: $3 - 22$ 129: $22 - 135: 6$ 136: $17 - 142: 8$	10 Years
PX05115	3/16/2018 0:00	{Redacted}	{Redacted}	and Cost Information; Sales and Financial Information;	Freedom	Partial	143: 13 - 145: 23	

Exhibit 1 Number	Γrial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05118	3/20/2018 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom		23:15-25:11, 39:21-40:8, 126:11-24, 128:3- 129:16	10 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
				Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing			8:14-11:4, 18:6- 25, 22:3-24:5, 27:4 28:4, 29:25-35:13, 42:6-44:5, 45:3- 16, 46:17-49:15, 52:25-55:8, 58:1- 10, 65:23-68:7, 69:12-70:5, 71:22- 74:6, 89:5-93:4, 99:12-23, 101:23- :104:17, 112:1-5, 113:10-116:18, 120:9-121:9, 123:11-124:21, 128:9-129:1, 132:6-11, 135:16- 136:4, 152:6- 157:9, 161:15- 165:12, 166:6-20, 168:16-169:4, 170:24-171:25, 178:20-180:7, 187:17-188:20, 190:3-192:21, 193:12-194:5,	10 Years
PX05122	3/22/2018 0:00	{Redacted}	{Redacted}	and Cost Information; Sales and Financial Information;	Freedom	Partial	196:4-197:9, 197:22-198:20,	

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05126	3/27/2018 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Partial	42:1 - 43:25, 67:1 - 70:25, 75:1 - 76:2, 106:1 - 25, 110:1 - 25, 111:1 - 112:25, 118:1 - 119:25, 122:1 - 25, 135:1 - 136:25, 135:1 - 137:2, 140:1 - 144:25, 151:1 - 25, 157:1 - 158:25, 164:1 - 167:25, 180:1 - 25, 181:1 - 25, 200:1 - 25, 203:1 - 204:25, 209:1 - 214:17	
PX05137	3/30/2018 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Partial	223: 14 - 230: 8, 231: 13 - 232: 21, 243: 7 - 244: 15	10 Years

Exhibit T Number	rial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05138	3/30/2018 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Partial	12: 2 - 14: 3 26: 21 - 31: 20 31: 21 - 34: 24 37: 15 - 42: 12 43: 23 - 46: 16 47: 3 - 48: 5 65: 16 - 66: 8 70: 2 - 18 94: 6 - 19 95: 11 - 102: 12 104: 9 - 106: 21 107: 6 - 108: 19 109: 9 - 113: 15 119: 19 - 121: 25 127: 8 - 129: 6 143: 11 - 144: 4 150: 24 - 168: 14 169: 2 - 172: 9 178: 9 - 180: 1 182: 5 - 193: 1 203: 5 - 205: 18 205: 19 - 216: 10 216: 17 - 218: 9 219: 15 - 221: 12 222: 9 - 226: 6	10 Years
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Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
PX05143	4/2/2018 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Partial		10 Years
RX-0006 FI000072 3		{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0007 FI000072 2		{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0013 FI000056 4		(Dodootod)	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial	Freedom	Complete		5 Years
RX-0029	1/8/2015	{Redacted}	{Redacted}	InformationBusiness Plans & Strategies;Intellectual Property,Proprietary Information andTrade Secrets; MarketAnalysis Documents; Pricingand Cost Information; Salesand Financial Information	Freedom	Complete		Indefinite
RX-0030	1/27/2015	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information	Freedom	Complete		Indefinite
RX-0041	3/24/2015 0:00	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information;	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0056 FI000054 5		{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
RX-0069	7/18/2015	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0070	7/21/2015	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0071	7/21/2015	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0073	8/3/2015	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
RX-0092	10/15/2015	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0110	12/9/2015	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
RX-0112	10/21/2015	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0113	12/15/2015	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0114	12/14/2015	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0116	12/16/2015	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0117	12/16/2015	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0127	1/26/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0147	2/29/2016 23:05		{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0148	3/1/2016 0:46	{Redacted}	{Redacted}	Business Plans & Strategies;	Freedom	Complete		5 Years
RX-0156	3/15/2016 18:45	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information; Sales and Financial Information;	Freedom	Complete		Indefinite
RX-0159	3/16/2016 21:45	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
RX-0163 FI000065 7	0,10,2010 21110	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0166	3/22/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0169	3/24/2016 23:37	{Redacted}	{Redacted}	Business Plans & Strategies;	Freedom	Complete		5 Years
RX-0172	3/30/2016	{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0177	4/6/2016 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
RX-0179	4/7/2016	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0182	4/12/2016	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0186	4/19/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0195	5/5/2016	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0196	5/6/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0197	5/10/2016 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information;	Freedom	Complete		5 Years
RX-0198	5/6/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0201	5/12/2016 22:53	{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information;	Freedom	Complete		5 Years
RX-0204	5/13/2016 5:09	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information;	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0205	5/17/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0206	5/17/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0207	5/17/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0210	5/21/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
RX-0213	5/24/2016	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0214	5/24/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0221	6/2/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0232	6/21/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0236	6/22/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0243	7/12/2016	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
RX-0244	7/12/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents	Freedom	Complete		5 Years
RX-0247	7/19/2016 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information;	Freedom	Complete		Indefinite
RX-0249	7/20/2016 14:05	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts;	Freedom	Complete		5 Years
RX-0251	7/26/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0256	8/2/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0259	8/11/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		Indefinite
RX-0260	8/12/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Partial, p. 2		Indefinite
RX-0261	8/17/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0262	8/22/2016	{Redacted}	{Redacted}	Market Analysis Documents	Freedom	Complete		5 Years
RX-0263	8/22/2016 23:33	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information;	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0265	8/24/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		Indefinite
RX-0272	8/31/2016 22:45	{Redacted}	{Redacted}	Market Analysis Documents;	Freedom	Complete		5 Years
RX-0274	9/13/2016 21:37			Business Plans & Strategies; Contract Negotiations and Customer Contracts	Freedom	Complete		5 Years
RX-0274	9/14/2016	{Redacted} {Redacted}	{Redacted} {Redacted}	Customer-Specific Documents	Freedom	Complete		5 Years
RX-0276	9/14/2016	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
RX-0279	9/20/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0280	9/21/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0282	9/22/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0283	9/22/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0284	9/22/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0285	9/22/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0289	9/28/2016 22:19	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
RX-0293	10/3/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents	Freedom	Complete		5 Years
RX-0294	10/4/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents	Freedom	Complete		5 Years
RX-0295	10/4/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0296	10/4/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0299	10/7/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
RX-0303	10/12/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0305	10/18/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0306	10/19/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom & Ottobock	Complete		Indefinite
RX-0308	10/19/2016 22:31	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information;	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
	40/40/2010 20 21	<b></b>		Business Plans & Strategies; Sales and Financial		Complete		5 Years
RX-0309 RX-0314	10/19/2016 22:31 10/20/2016	{Redacted}	{Redacted}	Information; Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0315	10/27/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents	Freedom	Complete		5 Years
RX-0318	11/8/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0319	11/10/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information	Freedom	Complete		Indefinite
RX-0331	12/6/2016	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents	Freedom	Complete		Indefinite
RX-0335	12/19/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0339	12/29/2016	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0340	12/29/2016	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts; Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0349	1/4/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0354	1/12/2017 5:52	(Dodootod)	(Dodootod)	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial	Freedom	Complete		5 Years
RX-0354	1/12/2017 5:52 1/27/2017	{Redacted}	{Redacted} {Redacted}	Information; Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0363 FI-V- 00001		{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0364	2/2/2017	{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0366	2/6/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0367	2/6/2017 0:00	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts;	Freedom	Complete		5 Years
RX-0368	2/7/2017	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts; Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0369	2/7/2017	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0370	2/13/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0376	3/4/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
RX-0377 FI-V- 00002		{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Partial, p. 2		5 Years
RX-0380	3/15/2017	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information	Freedom	Complete		Indefinite
RX-0383	3/23/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0384	3/23/2017	(Dadaatad)	(Dedested)	Business Plans & Strategies; Sales and Financial	Freedom	Dertiel n. 1		5 Years
RX-0385	3/23/2017	{Redacted} {Redacted}	{Redacted} {Redacted}	Information Business Plans & Strategies; Sales and Financial Information	Freedom	Partial, p. 1 Complete		5 Years
RX-0391	3/31/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
RX-0392	3/31/2017 0:00	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts; Sales and Financial Information;	Freedom	Complete		5 Years
RX-0402	4/11/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
RX-0403	4/17/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0405	4/18/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Sales and Financial Information;	Freedom	Complete		Indefinite
RX-0409	4/21/2017 15:50		{Redacted}	Contract Negotiations and Customer Contracts;	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0418	5/8/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		Indefinite
RX-0420	5/10/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0421	5/10/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0425	3/7/2017 4:21	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts; Sales and Financial Information	Freedom	Partial, pp. 6- 10		5 Years
RX-0426	5/15/2017	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
RX-0429	5/16/2017	{Redacted}	{Redacted}	Pricing and Cost Information	Freedom	Complete		3 Years
RX-0430	5/16/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Contract Negotiations and Customer Contracts	Freedom	Complete		5 Years
RX-0431	5/18/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0432 FI-V- 00003		{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0433	5/27/2017 16:29	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts	Freedom	Complete		5 Years
RX-0444	6/13/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
RX-0452	7/7/2017 0:00	{Redacted}	{Redacted}	Sales and Financial Information;	Freedom	Complete		5 Years
RX-0457	7/14/2017			Business Plans & Strategies; Customer-Specific Documents; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
		{Redacted}	{Redacted}	Sales and Financial		Ormulate		
RX-0459	7/14/2017 0:00	{Redacted}	{Redacted}	Information;	Freedom	Complete		5 Years
RX-0464	7/18/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
RX-0467	4/6/2015	{Redacted}	{Redacted}	Pricing and Cost Information	Freedom	Complete		3 Years
RX-0469	7/24/2017	{Redacted}	{Redacted}	Contract Negotiations and Customer Contracts; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0480	8/1/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information;	Freedom	Complete		5 Years
RX-0481	8/1/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information;	Freedom	Complete		5 Years
RX-0481	5/10/2017	{Redacted}	{Redacted}	Pricing and Cost Information	Freedom	Complete		3 Years
101-0400	0/10/2011	{neuacieu}	{Neuacieu}		riccuoin	Jounhiere		STEdis

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0488	8/3/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0501 FI000054 6		{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0505	8/17/2017 0:00	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0511	8/21/2017	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
RX-0529 FI021932 4		{Redacted}	{Redacted}	Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0537	9/10/2017	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
RX-0543	9/15/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Contract Negotiations and Customer Contracts; Sales and Financial Information	Freedom	Complete		5 Years
RX-0546	9/21/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0553	11/10/2016	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0573 FI-V- 00007		{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0577 Fl000001 5		{Redacted}	{Redacted}	Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0582 FI000000 1		{Redacted}	{Redacted}	Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0602	10/17/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0603	10/17/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information	Freedom	Complete		Indefinite
RX-0611	10/24/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0614	10/27/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0618	10/30/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0622 FI000037 5		{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
RX-0625	11/2/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0630	11/5/2017	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
RX-0632	11/6/2017	{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0634	11/6/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0669	11/21/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information;	Freedom	Complete		5 Years
RX-0677	11/28/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
RX-0701	11/30/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0705	12/1/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		5 Years
RX-0706	12/1/2017	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0708	12/1/2017 0:00	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information;	Freedom	Complete		Indefinite
RX-0710	12/4/2017	, ,		Business Plans & Strategies	Freedom	Complete		5 Years
RX-0731	12/14/2017	{Redacted} {Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0732	12/14/2017	{Redacted}	{Redacted}	Business Plans & Strategies	Freedom	Complete		5 Years
RX-0741	1/1/2018	{Redacted}	{Redacted}	Business Plans & Strategies; Customer-Specific Documents; Market Analysis Documents	Freedom	Complete		5 Years
RX-0746	1/3/2018	{Redacted}	{Redacted}	Business Plans & Strategies; Sales and Financial Information	Freedom	Complete		5 Years
RX-0747	1/4/2018	{Redacted}	{Redacted}	Market Analysis Documents	Freedom	Complete		5 Years
RX-0748	1/8/2018	{Redacted}	{Redacted}	Market Analysis Documents	Freedom	Complete		5 Years
RX-0757	1/15/2018	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
RX-0764	1/18/2018	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0766	1/22/2018	{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0767	1/23/2018	{Redacted}	{Redacted}	Business Plans & Strategies; Intellectual Property, Proprietary Information and Trade Secrets; Sales and Financial Information	Freedom	Complete		Indefinite
RX-0768	1/23/2018	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0772	1/25/2018	{Redacted}	{Redacted}	Business Plans & Strategies; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0773	1/25/2018	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information	Freedom	Complete		Indefinite
RX-0774 FI-V- 00008		{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0777	1/31/2018	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
RX-0789	2/8/2018	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets; Market Analysis Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		Indefinite

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0792 FI-V- 00011		{Redacted}	{Redacted}	Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0793	2/13/2018	{Redacted}	{Redacted}	Intellectual Property, Proprietary Information and Trade Secrets	Freedom	Complete		Indefinite
RX-0817 FI048319 5		{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
RX-0818 FI048319 6		{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
RX-0819	5/1/2017	{Redacted}	{Redacted}	Market Analysis Documents	Freedom	Complete		5 Years
RX-0820	9/22/2017	{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0821	10/17/2017	{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information	Freedom & Ottobock	Complete		5 Years
RX-0823	4/10/2017	{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
RX-0825	4/4/2017	{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0827	6/30/2016	{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0828	8/22/2016	{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years
RX-0830	8/15/2016	{Redacted}	{Redacted}	Market Analysis Documents; Sales and Financial Information	Freedom	Complete		5 Years

Exhibit Number	Trial Exhibit Date	Document Range	Trial Exhibit Description	In Camera Treatment	Party With Confidential Information	Complete vs. Partial In Camera Treatment	Designations for Deposition Transcripts	Duration of In Camera Treatment
RX-0833 FI048450 7		{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
RX-0884 FI-V- 00009		{Redacted}	{Redacted}	Customer-Specific Documents; Pricing and Cost Information; Sales and Financial Information	Freedom	Complete		5 Years
RX-0885 SSPR000 0001		{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years
RX-0902 FI-V- 00010		{Redacted}	{Redacted}	Sales and Financial Information	Freedom	Complete		5 Years

### **EXHIBIT B**

### PUBLIC

# DOCUMENTS FULLY REDACTED AND WITHHELD SUBJECT TO PENDING MOTION FOR IN CAMERA TREATMENT

## **EXHIBIT C**

### **PUBLIC**

#### UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of Otto Bock HealthCare North America, Inc., a corporation

Docket No. 9378

Respondent.

**PUBLIC DOCUMENT** 

#### DECLARATION OF MAYNARD CARKHUFF IN SUPPORT OF FREEDOM'S SECOND MOTION FOR *IN CAMERA* TREATMENT OF CERTAIN TRIAL EXHIBITS

I, Maynard Carkhuff, make the following declaration under 28 U.S.C. § 1746.

1. I am the Chairman of FIH Group Holdings, LLC ("Freedom"). I am also the manager of the Hold Separate Agreement and Asset Maintenance Agreement.

2. I previously held the positions of President, CEO, Vice Chairman and Chief Technology Officer for Freedom.

3. I submit this declaration in support of Freedom's Second Motion for *In Camera* Treatment (the "Motion").

4. I am personally familiar with the content of the documents identified in the Motion, the competitive significance to Freedom and the level of confidentiality associated with the subject matter therein. Based on my review of many of the documents identified in Exhibit "A", my conversations with those individuals who reviewed each document at my direction, my knowledge of Freedom's business, and my familiarity with the confidentiality protection afforded this type of information by Freedom, I submit that the disclosure of certain content reflected in these documents to the public and to competitors of Freedom would cause serious competitive injury to Freedom. In the ordinary course of business, Freedom keeps certain

information strictly confidential and limits its distribution within the company to employees who must or should know it in connection with their job duties. For example, sales and financial documents include Freedom's confidential financial information, which is typically segmented for product types, regions, and customers. This information is generally known only to a handful of sales, accounting, and marketing personnel. The only people outside of Freedom who would be aware of some of this information are the customers themselves or distributors of Freedom's products. Additionally, each document identified in Exhibit "A" has, upon production in this case, been designated "Confidential Material" pursuant to the Protective Order entered on December 20, 2017.

5. Freedom is a manufacturer of, among other things, prosthetic devices, and sells prosthetic devices to customers in the United States and around the world. The documents identified in Exhibit "A" relate to and contain information regarding Freedom's pricing strategy, sales and financial information, business plans and strategies, contract negotiations and customer contracts, intellectual property and proprietary information, market analyses, costing data, and customer-specific documents, all of which are critical to Freedom's business, marketing, sales, competitiveness and profitability. Competitors and third parties with access to this information would gain a significant business advantage in the prosthetic device marketplace at the expense of Freedom, its customers, and amputees.

6. I understand that the parties to this litigation have included on their trial exhibit lists over one thousand documents that may include Freedom's confidential information. I was provided with each document contained in Exhibit "A" of Freedom's Second Motion for *In Camera* Treatment of Certain Trial Exhibits. Due to the volume, a single person could not reasonably review and categorize each document. I reviewed many of the documents, and,

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further, a small number of agents acting at my direction has reviewed each document multiple times and has described to me the categories of confidential information contained in these documents. For each category, I explain below why Freedom would be harmed if the confidential information was made public. The comprehensive reviews of the documents were conducted for the purpose of determining which designated exhibits contain confidential information, the public disclosure of which would cause a clearly defined, serious injury to Freedom.

7. Freedom places significant value upon maintaining the secrecy and confidentiality of the categories of documents identified in Exhibit "A". The public disclosure of any of this critically sensitive information would be highly detrimental to Freedom. Each document is individually reviewed in turn below, and for convenience's sake, organized by the following categories:

- a. Business Plans & Strategies
- b. Contract Negotiations and Customer Contracts
- c. Intellectual Property, Proprietary Information and Trade Secrets
- d. Customer-Specific Documents
- e. Pricing and Cost Information
- f. Market Analysis Documents
- g. Sales and Financial Information
- h. Multiple Category Documents

8. The subject documents are also summarized in the table attached as Exhibit "A" to Freedom's Motion.

9. <u>Business Plans & Strategies</u>: Freedom has produced documents categorized as "Business Plans and Strategies," which include strategic plans, budgets, presentations, and other forward-looking business plans. The disclosure of these documents would harm Freedom by revealing to competitors Freedom's current and future business plans to improve its business. Allowing Freedom's competitors access to this information would allow them to see Freedom's future plans in the market and possibly make anticipatory decisions before Freedom can complete its plan, thereby undermining Freedom's plans for growth. Additionally, this information could allow competitors to enact their own defensive plans to combat Freedom's current plans. Finally, some of these documents involve plans for specific customers, which could allow these customers to use this information against Freedom in negotiations. I believe this information should remain confidential.

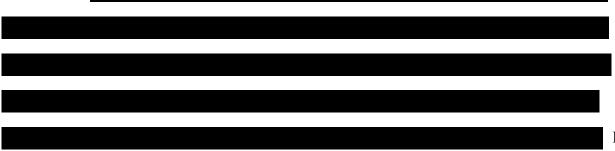
10. <u>Contract Negotiations and Customer Contracts</u>: Freedom has produced documents that include contract negotiations and contracts with customers. Freedom supplies prosthetic devices to many different customers and negotiates contracts with parties such as customers, distributors, banks and advisors. The public disclosure of the information contained in these documents could harm Freedom's customer relationships and undermine Freedom's ability to negotiate in the future, thereby seriously damaging Freedom's competitive position in the market. Freedom's relationships with certain customers could suffer if they learned that other customers entered into contracts with Freedom with different terms. Further, competitors will be able to seize on this information and use it to steal Freedom's customers, thus further disrupting Freedom's relationships with its customers. I believe this information should remain confidential.

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11. <u>Intellectual Property, Proprietary Information and Trade Secrets</u>: Freedom has produced documents that include trade secrets and proprietary information, including information regarding the technical specifications for its current and future products. The disclosure of this information would clearly harm Freedom's ability to compete in the market because competitors would be able to use Freedom's technology to create similar products and/or devise strategies to market its products against Freedom based on otherwise unavailable information.

12.	Customer-Specific Documents:	Freedom has also produced	"customer-specific
documents."			
	I believe this infor	mation should remain confide	ential.

13. <u>Pricing and Cost Information</u>: Freedom has also produced documents containing generic "pricing and cost information," as opposed to the customer-specific documents. This information is also sensitive and would seriously harm Freedom if publicly disclosed. Such information includes average sales price of certain products and certain categories of products. The disclosure of Freedom's prices and/or costs of its products would damage its relationship with its customers, undermine its negotiating power with customers, and assist competitors by providing them with vital information that Freedom has thus far remained confidential.



believe this information should remain confidential.

14. <u>Market Analysis Documents</u>: Freedom has produced "market analysis documents," which contain Freedom's analysis of competitors and the market in general, including assessments of competitor products and pricing. These documents are commercially valuable to Freedom's competitors and customers, and are inherently material to its business. Because the market analyses serve as a basis for current and future business plans, Freedom's market analyses can provide competitors with an insight into Freedom's current plans to market its products against competitors, as well as its future plans to better compete in the market. For instance, Freedom's market analyses may provide a competitor with weaknesses of a product or voids in a market, which a competitor can use in its marketing or to create a new product to fill that void. The sensitivity of these documents is similar to that of Freedom's business plans, as

they both provide insight into future plans and disclosure would allow a competitor to undermine Freedom's future growth. I believe this information should remain confidential.

15. <u>Sales and Financial Information</u>: Freedom has produced documents containing its "sales and financial information." Freedom's sales data and financial information are commercially valuable to Freedom's competitors and customers, and are inherently material to its business. Disclosure of this information would undermine Freedom's negotiating power with customers and would allow competitors to obtain valuable insight into Freedom's business. The public release of these materials would harm Freedom because the data can reveal Freedom's current and future plans to improve its business and compete in the market. Freedom's competitors could use these documents to plan their own competitive activities and/or unfairly undermine Freedom's plans for growth. For example, some of Freedom's financial and sales documents segment its sales by each customer, which would allow competitors to see Freedom's strongholds or where Freedom's support was wavering. I believe this information should remain confidential.

16. All of the documents identified in Exhibit "A" that are more than three years old contain information that is highly sensitive, and the length of time that has passed has not deteriorated the level of confidentiality. Such documents include forecasts and plans that go beyond 2018, which would provide competitors with Freedom's current and future business plans similar to the more recent business plans and strategies set forth Paragraph 9. Other such documents include pricing that was given to different customers, which could, to this day, still disrupt Freedom's customer relationships if they found out they paid higher prices than other customers. Altogether, each of the documents more than three years old, identified in Exhibit "A," contains information that remains competitively sensitive.

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Prior to this administrative proceeding, the information contained in the document 17. identified in Exhibit "A" has been exposed only to appropriate Freedom personnel, any parties included in the subject communications, and any contracting parties to the documents. Freedom requires its employees to sign non-disclosure and confidentiality agreements to protect and maintain the secrecy of this information. General Freedom employees do not have access to the documents containing in camera material. As a private company, none of the aforementioned information is in the public domain and cannot be obtained through other means.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury, that the foregoing is true and correct.

This  $\underline{/\mathcal{L}}$  th day of July, 2018.

Washington, D.C. City, State

Maynard Carkhuff

## **EXHIBIT D**

### PUBLIC

# DOCUMENT FULLY REDACTED AND WITHHELD SUBJECT TO PENDING MOTION FOR IN CAMERA TREATMENT

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 23, 2018, I caused a true and correct copy of the foregoing Freedom's Second Motion for *In Camera* Treatment of Certain Trial Exhibits to be served via FTC E-Filing System and e-mail upon the following:

D. Michael Chappell Chief Administrative Law Judge 600 Pennsylvania Ave., N.W. Rm. H-110 Washington, DC, 20580

Donald S. Clark Federal Trade Commission Office of the Secretary 600 Pennsylvania Avenue NW Washington DC, 20580

Meghan Iorianni Jonathan Ripa Steven Lavender William Cooke Yan Gao Lynda Lao Stephen Mohr Michael Moiseyev James Weiss Daniel Zach

Federal Trade Commission 600 Pennsylvania Ave., NW Washington, DC, 20580 Amy Posner Lisa De Marchi Sleigh Catherine Sanchez Sarah Wohl Joseph Neely Dylan Brown Betty McNeil Stephen Rodger Jordan Andrew

/s/ Andrew J. Rudowitz Andrew J. Rudowitz, Esq.

#### Notice of Electronic Service

#### I hereby certify that on July 23, 2018, I filed an electronic copy of the foregoing Freedom's Second Motion for In Camera Treatment of Certain Trial Exhibits, with:

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

Donald Clark 600 Pennsylvania Ave., NW Suite 172 Washington, DC, 20580

I hereby certify that on July 23, 2018, I served via E-Service an electronic copy of the foregoing Freedom's Second Motion for In Camera Treatment of Certain Trial Exhibits, upon:

Steven Lavender Attorney Federal Trade Commission slavender@ftc.gov Complaint

William Cooke Attorney Federal Trade Commission wcooke@ftc.gov Complaint

Yan Gao Attorney Federal Trade Commission ygao@ftc.gov Complaint

Lynda Lao Attorney Federal Trade Commission llao1@ftc.gov Complaint

Stephen Mohr Attorney Federal Trade Commission smohr@ftc.gov Complaint

Michael Moiseyev Attorney Federal Trade Commission mmoiseyev@ftc.gov Complaint

James Weiss Attorney Federal Trade Commission jweiss@ftc.gov

#### Complaint

Daniel Zach Attorney Federal Trade Commission dzach@ftc.gov Complaint

Amy Posner Attorney Federal Trade Commission aposner@ftc.gov Complaint

Meghan Iorianni Attorney Federal Trade Commission miorianni@ftc.gov Complaint

Jonathan Ripa Attorney Federal Trade Commission jripa@ftc.gov Complaint

Wayne A. Mack Duane Morris LLP wamack@duanemorris.com Respondent

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