

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

In the Matter of

TAPESTRY, INC., a corporation,

and

CAPRI HOLDINGS LIMITED,
a corporation,

Docket No. 9429

**NON-PARTY STAUD, INC.'S UNOPPOSED
MOTION FOR *IN CAMERA* TREATMENT**

Non-Party STAUD, Inc. (“STAUD”), a privately held company, respectfully moves this Court pursuant to Rule 3.45 of the Commission’s Rules of Practice, 16 C.F.R. § 3.45(b), for *in camera* treatment of certain competitively sensitive, confidential business documents (the “Confidential Documents”) that STAUD produced and which the Federal Trade Commission (“FTC”) and Respondents Capri Holdings Limited (“Capri”) and Tapestry, Inc. (“Tapestry”) (together, “Respondents”) have designated as administrative trial exhibits. *See* Letter from the FTC dated August 29, 2024 (attached as Exhibit A) and E-mail from Capri dated August 30, 2024 (attached as Exhibit B).

STAUD is a third-party to this litigation, and its confidential business documents would not have been made public but for subpoenas it received in this case. STAUD asks the Court to grant *in camera* treatment of these documents for a five-year period. *In camera* treatment is necessary to prevent STAUD’s competitors from gaining access to STAUD’s competitively sensitive documents and information. The parties do not oppose STAUD’s motion for *in camera* treatment of the Confidential Documents.

In support of this motion, STAUD relies on the Declaration of Casey Williams, attached as Exhibit C (“Williams Confidentiality Decl.”), which provides additional details about the Confidential Documents, and states as follows.

I. The Confidential Documents

STAUD produced documents in response to subpoenas that Capri served on May 14, 2024, and that the FTC served on May 15, 2024. STAUD seeks protection for the competitively sensitive and confidential STAUD documents that the FTC and Respondents included on their respective exhibit lists.

In particular, the FTC and Respondents have informed STAUD that, collectively, they intend to offer five STAUD documents into evidence at the upcoming administrative trial, all of which STAUD designated confidential under the protective order, along with a declaration of Casey Williams (“Williams Authenticity Declaration”). STAUD seeks *in camera* treatment for the entirety of four of the documents.

| Exhibit No. | Begin Bates | End Bates | Date | Title |
|--------------------------|--------------|--------------|-------------------------|---|
| DX-0028, PX3140 | STAUD_000001 | STAUD_000001 | January 2019 – May 2024 | STAUD Monthly Spend Paid Search Spreadsheet |
| DX-0029, PX3106 | STAUD_000002 | STAUD_000002 | January 2019 – May 2024 | STAUD Handbag Sales 2019-2024 Spreadsheet |
| DX-0030, DX-0331, PX3107 | STAUD_000004 | STAUD_000025 | June 2021 | STAUD investor deck |
| DX-0032, DX-0333 | STAUD_000027 | STAUD_000027 | January 2019 – May 2024 | STAUD Manufacturer Data Spreadsheet |

Copies of each of the four Confidential Documents for which STAUD seeks *in camera* treatment in their entirety are attached as sealed Exhibits D, E, F, and G.

II. Legal Standard

An Administrative Law Judge may order that material offered into evidence be placed *in camera* under Commission Rule 3.45(b), “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). The requesting party must “make a clear showing that the information concerned is sufficiently secret and sufficiently material to [its] business that disclosure would result in serious competitive injury.” *In re General Foods Corp.*, 1980 FTC LEXIS 99, at *10 (Mar. 10, 1980); see *In the Matter of 1-800-Contacts, Inc.*, 2016 FTC LEXIS 146, at *2 (Aug. 8, 2016). In determining whether *in camera* treatment is justified, courts consider the following factors: (1) the extent to which information is known outside of the business; (2) the extent to which it is known by employees and others involved in the business; (3) the extent of measures taken to guard the secrecy of the information; (4) the value of the information to the business and its competitors; (5) the amount of effort or money expended in developing the information; and (6) the ease or difficulty with which the information could be acquired or duplicated by others. *In re Bristol-Myers Co.*, 1977 WL 189054, at *2 (Nov. 11, 1977). These factors favor *in camera* treatment of STAUD’s Confidential Documents.

In camera treatment is routinely granted for competitively sensitive business records, including documents revealing financial metrics such as costs, margins, revenues, competitive positioning, strategic plans, and marketing and pricing strategies. See, e.g., *1-800 Contacts*, 2016 FTC LEXIS 146, at *8-35 (granting third parties’ requests for five-year *in camera* treatment of documents discussing customer-specific pricing, marketing and bidding strategies, financial metrics, and other competitively sensitive information); *In re North Texas Specialty Physicians*,

2004 FTC LEXIS 109, at *5-21 (April 23, 2004) (granting third parties' requests for five-year *in camera* treatment of documents containing competitively sensitive information, such as fee schedules, strategic plans, and negotiating strategies). *In camera* treatment is also granted where disclosing such information would give competitors insight into a company's "relative size in a particular product line market which competitors could employ to their advantage." *In re Champion Spark Plug Co.*, 1982 FTC LEXIS 85, at *2 (April 5, 1982). When *in camera* treatment is granted for these types of business records, it is typically provided for two to five years. *See North Texas Specialty Physicians*, 2004 FTC LEXIS 109, at *2.

Third parties deserve "special solicitude" in their requests for *in camera* treatment for their confidential business information. *See In re Kaiser Aluminum & Chem. Corp.*, 103 FTC 500, at *2-3 (May 25, 1984) ("As a policy matter, extensions of confidential or *in camera* treatment in appropriate cases involving third party bystanders encourages cooperation with future adjudicative discovery requests.").

III. Argument

STAUD, a non-party to this litigation, requests *in camera* treatment for the entirety of four competitively sensitive documents that the FTC and/or Respondents identified as trial exhibits. This narrowly tailored request is focused on specific material the disclosure of which to the public and to STAUD's competitors would cause competitive harm to STAUD. As discussed in the Williams Confidentiality Decl. (Ex. C), these documents reveal business strategies, financial information, pricing, revenues, sales, marketing plans, supply chain information, business development strategies, and market assessments that STAUD does not share publicly, and which STAUD disseminates only to those STAUD agents with a need to know the information. STAUD would suffer competitively if this information were made available through these proceedings to its competitors. The disclosure of "competitively sensitive documents" is the kind of "serious

injury” that supports the *in camera* treatment STAUD requests. See *North Texas Specialty Physicians*, 2004 FTC LEXIS 109, at *6 (granting *in camera* treatment where documents were “competitively sensitive” and disclosure could cause serious competitive injury).

Each of these four Confidential Documents contains data that is more than three years old. While there is a presumption against providing *in camera* treatment for information of that age, the presumption can be overcome by “demonstrate[ing] ... that [the] material remains competitively sensitive.” *In re 1-800 Contacts*, 2017 FTC LEXIS 55, at *3 (April 4, 2017); see also *In re Polypore Int’l, Inc.*, 2009 WL 1499350, at *5 (May 13, 2009) (granting *in camera* treatment for documents over three years old, while noting presumption against doing so). The competitive value of the information in these Confidential Documents overcomes the presumption. Each of these Confidential Documents contains comprehensive data regarding all aspects of STAUD’s business, including, among other things, its sales, marketing spend, and manufacturers. Further, the data in these Confidential Documents is not significantly older than three years – for three of these Confidential Documents, the data goes back to 2019, and for the fourth, it is from June 2021.

STAUD’s status as a third party is relevant to the treatment of its Confidential Documents. The Commission has held that “[t]here can be no question that the confidential records of businesses involved in Commission proceedings should be protected insofar as possible.” *H.P. Hood & Sons*, 1961 WL 65882, at *2, 4 (Mar. 14, 1961) (noting that courts generally attempt “to protect confidential business information from unnecessary airing”); see also *In re McWane, Inc.*, 2012 WL 3862131, at *2 (Aug. 17, 2012). This protection is particularly warranted in the case of a third party, which deserves “special solicitude” in its request for *in camera* treatment for its confidential business information. See *In re Kaiser Aluminum & Chem.*, 103 FTC at 500.

Therefore, STAUD's third-party status favors granting *in camera* status for the Confidential Documents.

IV. Conclusion

For the reasons set forth above and in the accompanying Williams Confidentiality Decl., STAUD respectfully requests that this Court protect STAUD's competitively sensitive information by granting *in camera* treatment for STAUD_000001, STAUD_000002, STAUD_000004 and STAUD_000027, for a five year period from the date of the requested Order.

Dated: September 10, 2024

Respectfully submitted,

By: /s/Elizabeth C. Wolicki

Stephen J. Siegel
ssiegel@atllp.com
Elizabeth C. Wolicki
ewolicki@atllp.com
ARMSTRONG TEASDALE LLP
100 North Riverside Plaza
Chicago, IL 60606
(312) 419-6900

Counsel for Non-Party STAUD, Inc.

STATEMENT REGARDING MEET AND CONFER

The undersigned certifies that Respondent Counsel in its evidentiary notice (Exhibit B) informed counsel for STAUD that Respondents would not object to STAUD's motion and that the FTC informed counsel for STAUD via e-mail on September 9, 2024 that it would not object to STAUD's motion.

Dated: September 10, 2024

By: /s/Elizabeth C. Wolicki

Stephen J. Siegel
ssiegel@atllp.com
Elizabeth C. Wolicki
ewolicki@atllp.com
ARMSTRONG TEASDALE LLP
100 North Riverside Plaza
Chicago, IL 60606
(312) 419-6900

Counsel for Non-Party STAUD, Inc.

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

In the Matter of

TAPESTRY, INC., a corporation,

and

CAPRI HOLDINGS LIMITED,
a corporation,

Docket No. 9429

**[PROPOSED] ORDER GRANTING NON-PARTY
STAUD, INC.’S UNOPPOSED MOTION FOR *IN CAMERA* TREATMENT**

Having considered non-party STAUD, Inc.’s Unopposed Motion for *In Camera* Treatment, STAUD’s motion is granted. It is HEREBY ORDERED that the following exhibits are to be provided *in camera* treatment for five years from the date of this Order:

| Exhibit No. | Begin Bates | End Bates | Date | Title |
|--------------------------------|--------------|--------------|----------------------------|--|
| DX-0028, PX3140 | STAUD_000001 | STAUD_000001 | January 2019 – May 2024 | STAUD Monthly Spend Paid Search Spreadsheet |
| DX-0029, PX3106 | STAUD_000002 | STAUD_000002 | January 2019 – May 2024 | STAUD Handbag Sales 2019-2024 Spreadsheet |
| DX-0030, DX-0331, PX3107 | STAUD_000004 | STAUD_000025 | June 2021 | STAUD investor deck |
| DX-0032, DX-0333 | STAUD_000027 | STAUD_000027 | January 2019 – May 2024 | STAUD Manufacturer Data Spreadsheet |

ORDERED:

Date: _____

Hon. Dania L. Ayoubi

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2024, I filed the foregoing **Non-Party STAUD, Inc.'s Unopposed Motion for *In Camera* Treatment**, electronically using the FTC's E-Filing System, which will send notification of such filing to:

April Tabor
Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-113
Washington, DC 20580
ElectronicFilings@ftc.gov

The Honorable Dania L. Ayoubi
Office of Administrative Law Judges
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-110
Washington, DC 20580
OALJ@ftc.com

I also certify that I caused the foregoing document to be served via email upon the following:

Complaint Counsel**U.S. Federal Trade Commission**

Abby L. Dennis (adennis@ftc.gov)
Peggy Bayer Femenella (pbayerfemenella@ftc.gov)
Frances Anne Johnson (fjohnson@ftc.gov)
Timothy Singer (tsinger@ftc.gov)
Brandon Boxbaum (bboxbaum@ftc.gov)
Victoria Sims (vsims@ftc.gov)
Peter Colwell (pcolwell@ftc.gov)
Blake Risenmay (brisenmay@ftc.gov)
Andrew Lowdon (alowdon@ftc.gov)
Sarah Kerman (skerman@ftc.gov)
Kassandra DiPietro (kdipietro@ftc.gov)
Nicole Lindquist (nlindquist@ftc.gov)
Danielle Quinn (dquinn@ftc.gov)
Laura Antonini (lantonini@ftc.gov)
Sean D. Hughto (shughto@ftc.gov)
Edmund Saw (esaw@ftc.gov)

Counsel for Respondent Tapestry, Inc.**Latham & Watkins LLP**

Amanda P. Reeves (amanda.reeves@lw.com)
Ian R. Conner (ian.conner@lw.com)
Lindsey S. Champlin (lindsey.champlin@lw.com)

Jennifer L. Giordano (jennifer.giordano@lw.com)
David L. Johnson (david.johnson@lw.com)
Seung Wan (Andrew) Paik (andrew.paik@lw.com)
Mary A. Casale (Mary.Casale@lw.com)
Christopher J. Brown (Chris.Brown@lw.com)
Al Pfeiffer (Al.Pfeiffer@lw.com)
Christopher S. Yates (Chris.Yates@lw.com)
Lawrence E. Buterman (Lawrence.Buterman@lw.com)
Sean Berkowitz (Sean.Berkowitz@lw.com)

Counsel for Respondent Capri Holdings Limited

Wachtell, Lipton, Rosen & Katz

Jonathan M. Moses (JMMoses@WLRK.com)
Elaine P. Golin (EPGolin@WLRK.com)
Damian G. Didden (DGDidden@WLRK.com)
Katharine R. Haigh (KRHaigh@WLRK.com)
Brittany A. Fish (BAFish@WLRK.com)
Martin J. Sicilian (MJSicilian@WLRK.com)
Jordan Cohen-Kaplan (JCKaplan@WLRK.com)
Adam L. Goodman (ALGoodman@WLRK.com)
Karen Wong (KWong@wlrk.com)

/s/ Elizabeth C. Wolicki

Stephen J. Siegel
ssiegel@atllp.com
Elizabeth C. Wolicki
ewolicki@atllp.com
ARMSTRONG TEASDALE LLP
100 North Riverside Plaza
Chicago, IL 60606
(312) 419-6900

Counsel for Non-Party STAUD, Inc.

EXHIBIT A

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

WASHINGTON, D.C. 20580

Bureau of Competition
Mergers II Division

August 29, 2024

VIA EMAIL TRANSMISSIONSTAUD, Inc. C/O
Elizabeth C. Wolicki
Armstrong Teasdale LLP
7 Timothy Singeres Square
Floor 44
New York, NY 10036
ewolicki@atllp.comRE: *In the Matter of Tapestry, Inc. and Capri Holdings Limited*, Docket No. 9429

Dear Elizabeth C. Wolicki:

By this letter we are providing formal notice, pursuant to Rule 3.45(b) of the Commission's Rules of Practice, 16 C.F.R. § 3.45(b), that Complaint Counsel intends to offer the documents and testimony referenced in the enclosed Attachment A into evidence in the administrative trial in the above-captioned matter. Please let me know if you need copies of the documents and testimony referenced in Attachment A.

The administrative trial is scheduled to begin on September 25, 2024. All exhibits admitted into evidence become part of the public record unless Administrative Law Judge Dania L. Ayoubi grants *in camera* status (i.e., non-public/confidential).

For documents or testimony that include sensitive or confidential information that you do not want on the public record, you must file a motion seeking *in camera* status or other confidentiality protections pursuant to 16 C.F.R. §§ 3.45 and 4.10(g). Judge Ayoubi may order materials, whether admitted or rejected as evidence, be placed *in camera* only after finding that their public disclosure will likely result in a clearly-defined, serious injury to the person, partnership, or corporation requesting *in camera* treatment.

Motions for *in camera* treatment for evidence to be introduced at trial must meet the strict standards set forth in 16 C.F.R. § 3.45 and explained in *In re 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re Jerk, LLC*, 2015 FTC LEXIS 39 (Feb. 23, 2015); *In re Basic Research, Inc.*, 2006 FTC LEXIS 14 (Jan. 25, 2006). Motions also must be supported by a declaration or affidavit by a person qualified to explain the confidential nature of the material. *In re 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re North Texas Specialty Physicians*, 2004 FTC LEXIS 66 (Apr. 23, 2004). For your convenience, we included, as links in the cover email, an example of a third-party motion (and the accompanying declaration or affidavit) for *in camera* treatment that was filed and granted in an FTC administrative proceeding. If you choose to move for *in camera* treatment, you must provide a copy of the

document(s) for which you seek such treatment to the Administrative Law Judge. Also, you or your representative will need to file a Notice of Appearance in the administrative proceeding. For more information regarding filing documents in adjudicative proceedings, please see <https://www.ftc.gov/about-ftc/bureaus-offices/office-secretary/document-filing>.

Please be aware that under the current Scheduling Order **the deadline for filing motions seeking *in camera* treatment is September 10, 2024**. A copy of the May 16, 2024 Scheduling Order can be found at [Tapestry/Capri](#). If you have any questions, please feel free to contact me at (202) 326-2701 or lantonini@ftc.gov.

Sincerely,

/s/ Laura Antonini
Laura Antonini
Counsel Supporting the Complaint

Attachment

| Ex No. | Description | Date | Bates-Begin | Bates-End |
|---------------|--|-------------|--------------------|------------------|
| PX3106 | Staud Spreadsheet: STAUD Handbag Sales 2019 - 2024 with Country - Tapestry Capri | | STAUD_000002 | STAUD_000002 |
| PX3107 | Staud Spreadsheet: STAUD Handbag Sales 2019 - 2024 with Country - Tapestry Capri | | STAUD_000004 | STAUD_000004 |
| PX3140 | Staud Spreadsheet: Monthly Spend Paid Search | | STAUD_000001 | STAUD_000001 |
| PX3141 | Staud Spreadsheet: No. 10 - Retail Store Info | | STAUD_000026 | STAUD_000026 |

EXHIBIT B

From: Pollard, Beatrice R. <BRPollard@wlrk.com>
Sent: Friday, August 30, 2024 5:52 PM
To: Elizabeth C. Wolicki
Cc: Golin, Elaine P.; Fish, Brittany A.
Subject: STAUD Confidential Materials
Attachments: 2024.05.16 - Scheduling Order.pdf; 2024.04.25 - Protective Order Governing Confidential Material.pdf

CAUTION: EXTERNAL EMAIL

Counsel,

Pursuant to the Scheduling Order and Protective Order *In the Matter of Tapestry Inc., and Capri Holdings Ltd.*, Dkt No. 9439 (attached for reference) and 16 C.F.R. § 3.45(b), we are providing notice that we intend to offer materials or testimony provided by STAUD as evidence at the FTC's Part 3 administrative evidentiary hearing beginning on September 25, 2024 in Washington, DC. Accordingly, pursuant to the Scheduling Order in this matter, if a third party wishes *in camera* treatment for a document or transcript that a party intends to introduce into evidence, that third party shall file an appropriate motion with the Administrative Law Judge within ten (10) days after it receives notice of a party's intent to introduce such material. Respondents will not oppose any proposed *in camera* treatment. The materials and/or testimony included are:

1. DX-0032 - STAUD_000027
2. DX-0031 - STAUD_000026
3. DX-0030 - STAUD_000004
4. DX-0331 - STAUD_000004
5. DX-0333 - STAUD_0000027
6. DX-0332 - STAUD_0000026
7. DX-0029 - STAUD_000002
8. DX-0028 - STAUD_000001
9. DX-0027 - Declaration of C. Williams (Staud)

Thanks,

Beatrice

Beatrice R. Pollard

Wachtell, Lipton, Rosen & Katz
51 West 52nd Street | New York, NY 10019
+1 (212) 403-1654 (Direct) | +1 (212) 403-2000 (Fax)
BRPollard@wlrk.com | www.wlrk.com

=====

Please be advised that this transmittal may be a confidential attorney-client communication or may otherwise be privileged or confidential. If you are not the intended recipient, please do not read, copy or re-transmit this communication. If you have received this communication in error, please notify us by e-mail (helpdesk@wlrk.com) or by telephone (call us collect at 212-403-4357) and delete this message and any attachments.

Thank you in advance for your cooperation and assistance.

=====

EXHIBIT C

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

In the Matter of

TAPESTRY, INC., a corporation,

and

CAPRI HOLDINGS LIMITED,
a corporation,

Docket No. 9429

**DECLARATION OF CASEY WILLIAMS IN SUPPORT OF
NON-PARTY STAUD, INC.’S UNOPPOSED MOTION FOR *IN CAMERA* TREATMENT**

I, Casey Williams, hereby declare as follows:

1. I am the Chief Financial Officer at STAUD, Inc. (“STAUD”). I make this declaration in support of non-party STAUD, Inc.’s Unopposed Motion for *In Camera* Treatment (the “Motion”). I have personal knowledge of the matters stated herein and, if called upon to do so, could competently testify about them.

2. I have reviewed and am familiar with the documents STAUD produced that the FTC and/or Respondents Capri Holdings Limited (“Capri”) and Tapestry, Inc. (“Tapestry”) notified STAUD they intend to offer into evidence at the upcoming administrative trial, including the confidential documents for which STAUD seeks *in camera* protection (the “Confidential Documents”). Based on my position at STAUD, my knowledge and review of the Confidential Documents, and my familiarity with the confidentiality protection STAUD affords this type of information, the disclosure of the Confidential Documents to the public and STAUD’s competitors would cause serious competitive injury to STAUD.

3. The FTC and/or Respondents have informed STAUD that they intend to use at the upcoming administrative trial five documents that STAUD produced. Of these documents, four

are particularly sensitive and contain confidential business information that should be withheld in their entirety from disclosure to the public and STAUD’s competitors.

| Exhibit No. | Begin Bates | End Bates | Date | Title |
|--------------------------------|--------------------|------------------|----------------------------|---|
| DX-0028, PX3140 | STAUD_000001 | STAUD_000001 | January 2019 – May 2024 | STAUD Monthly Spend Paid Search Spreadsheet |
| DX-0029, PX3106 | STAUD_000002 | STAUD_000002 | January 2019 – May 2024 | STAUD Handbag Sales 2019-2024 Spreadsheet |
| DX-0030, DX-0331, PX3107 | STAUD_000004 | STAUD_000025 | June 2021 | STAUD investor deck |
| DX-0032, DX-0333 | STAUD_000027 | STAUD_000027 | January 2019 – May 2024 | STAUD Manufacturer Data Spreadsheet |

4. DX-0028/PX3140 is a spreadsheet containing comprehensive data regarding STAUD’s monthly spend on marketing of its handbags across various online channels, along with specific information regarding paid online searches. STAUD does not share this information outside of the company without a formal Non-Disclosure Agreement, or widely within STAUD’s business. Such information is only accessible internally by STAUD’s executive team and is not stored on common drives. Such disclosure publicly and to STAUD’s competitors would provide information to STAUD’s competitors regarding its marketing strategy for its handbags and result in harm to STAUD.

5. DX-0029/PX3106 is a spreadsheet containing comprehensive data regarding STAUD’s handbag sales in the United States from January 2019 – May 2024, including SKU sales, units sold, sale price, value of discounts applied, net price, sales channel, sale date and

customer type. STAUD does not share this comprehensive data outside the company without a formal Non-Disclosure Agreement, or widely within STAUD's business. Such information is only accessible internally by STAUD's executive team and is not stored on common drives. Its disclosure publicly and to STAUD's competitors would undercut STAUD's ability to compete effectively and result in serious harm to STAUD.

6. DX-0030/DX-0331/PX3107 is an investor deck containing confidential business plans and strategy and assessment of the market. This investor deck was disclosed only to STAUD's actual and prospective investors and not to the general public, and only with a formal Non-Disclosure Agreement. It also was not shared widely within STAUD's business. Such information is only accessible internally by STAUD's executive team and is not stored on common drives. If disclosed, this information could provide STAUD's competitors a window into STAUD's business strategy that they could use to disadvantage STAUD in the marketplace, resulting in serious harm to STAUD.

7. DX-0032/DX-0333 is a spreadsheet containing the names and locations of STAUD's manufacturers, as well as the quantity and type of handbag manufactured by each of STAUD's manufacturers. STAUD does not share this comprehensive information outside of the company without a formal Non-Disclosure Agreement, or widely within STAUD's business. Such information is only accessible internally by STAUD's executive team and is not stored on common drives. Its disclosure publicly and to STAUD's competitors would provide its competitors a window into STAUD's manufacturers and supply chain that they could use to disadvantage STAUD in the marketplace, resulting in serious harm to STAUD.

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

Dated: 9/10/2024

DocuSigned by:
Casey Williams
45BA504AD433493...

Casey Williams

EXHIBIT D

Documents for which *in camera* treatment is requested in their entirety

DOCUMENTS EXCLUDED FROM PUBLIC VERSION

EXHIBIT E

Documents for which *in camera* treatment is requested in their entirety

**DOCUMENTS EXCLUDED FROM
PUBLIC VERSION**

EXHIBIT F

Documents for which *in camera* treatment is requested in their entirety

DOCUMENTS EXCLUDED FROM PUBLIC VERSION

EXHIBIT G

Documents for which *in camera* treatment is requested in their entirety

**DOCUMENTS EXCLUDED FROM
PUBLIC VERSION**