

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

In the Matter of)

LENTEK INTERNATIONAL, INC.)
a corporation, and)

DOCKET NO. 9303

JOSEPH DUREK and LOU LENTINE,)
individually and as officers)
of the corporation.)

**INITIAL DISCLOSURES OF RESPONDENTS LENTEK INTERNATIONAL, INC.,
JOSEPH DUREK AND LOU LENTINE**

Pursuant to § 3.31(b)(1) and (2) of the Federal Trade Commission’s Rules of Practice for Adjudicative Proceedings, Respondents Lentek International, Inc. (“Lentek”), a corporation, and Joseph Durek, and Lou Lentine, individually and as officers of Lentek (collectively, “Respondents”), by their attorneys, Foley & Lardner hereby submit their initial disclosures to Complaint Counsel. Set forth below are the names of individuals likely to have discoverable information relevant to the allegations asserted in the complaint in this matter or defenses raised in the Respondents’ answer. In addition, Respondents are providing documents in Respondents’ possession, custody or control that are, or may be, relevant to the allegations in this matter, the proposed relief, or to the defenses raised in the answer, except for those documents covered by § 3.31(c)(2)-(4) of the Rules of Practice. Respondents also are identifying the categories of such documents in Respondents’ possession that cannot be produced until Respondents have taken the necessary steps to seek a protective or in camera order. Respondents intend to file a motion with the Administrative Law Judge for such an order in conjunction with these disclosures, pursuant to Rule 3.45(a) of the Rules of Practice. Finally, Respondents request confidential treatment of these disclosures and the enclosed documents which contain confidential information and other

trade secrets, and are being provided voluntarily in lieu of compulsory process. Thus, this set of initial disclosures and those documents provided are protected from disclosure under section 21(f) of the Federal Trade Commission Act. Lentek specifically requests the Commission not to disclose these disclosures or any of the enclosed documents unless and until the Commission has given Lentek the notice required by section 21(c)(2) (prior notice before disclosure to any person) and, if applicable, the notice required by section 21(d)(A) (notice upon disclosure to either house of Congress or to any committee or subcommittee of Congress).

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

The following individuals are likely to have discoverable information relevant to the allegations in this matter, the proposed relief, or defenses raised in the answer. Where available,

Respondents have set forth each individual's full name, address, and telephone number.

Respondents are not disclosing the identity of any non-testifying experts pursuant to the protection from disclosure provided in § 3.31(c)(3) and (4) of the Rules of Practice.

Respondents will disclose the identity of all of their testifying experts on the date provided in the Discovery Schedule entered by the Administrative Law Judge.

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Post Office Box 2931
Wichita, Kansas 67201

Global Instruments, Ltd.
Product Division President — Pest-a-Cator
819 Industrial Drive
Trenton, Missouri 64683

Sunbeam, Inc.
Product Division President -- Promolife
Post Office Box 385
Fayetteville, Arkansas 72702
479-442-3404

Mag Enterprises
Product Division President — Pest-Free-Repeller
Post Office Box 210334
Montgomery, Alabama 36121

Best Offense Products, Inc.
Product Division President — Pest OFFense
Maitland, Florida 32794
1-888-737-8234

II. RELEVANT DOCUMENTS

A. Respondents are producing the attached documents that are or may be relevant to the allegations in the complaint, the proposed relief, or the defenses set forth in Respondents' answer. The documents have been separated according to the product line to which they are most relevant. The documents are numbered as follows:

- 2. Sila Air Cleaner products: LENSIL0001-000312
- 3. PestContro products: LENPES0001-000354
- 4. MosquitoContro products: LENMOS0001-00024

B. The following categories of documents are in Respondents' possession, custody, or control and are or may be relevant to the allegations in the complaint, the proposed relief, or the defenses set forth in respondents' answer:

Report for Global Instrument: Field Site Observations and Conclusions for Pest-A-Cator Efficacy upon Mice, Rats, Roaches, Insects and Other Pests by Wilfred E. Lipman.

- 1. Analytical & Testing Laboratory, Des Moines, Iowa: Laboratory Report for Global Instruments evaluating Pest-A-Cator by J. H. Roberts.
- 2. Pestchaser Ultrasonic Rodent Repeller Field Test Efficacy Study: analysis and review by Dr. William B. Jackson.
- 3. Cockroach Repellency Analysis performed for Lentek, International, Inc., by Insect Control & Research, Inc.

4. Lentek International's Sila IO Series: Output Tests and Measurement
Techniques, performed by Lentek and Affiliated Companies.

As explained earlier, Respondents will submit these documents after the Administrative
Law Judge has ruled upon Respondents' motion seeking a protective or in camera order.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this 30th day of September 2002, the original, one paper copy, and one electronic copy of the foregoing Initial Disclosures of Respondents Lentek International, Inc., Joseph Durek and Lou Lentine were filed with the Secretary of the Commission, and that one copy was served by hand delivery to the Honorable D. Michael Chappell, Administrative Law Judge at the Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580, and that four copies were served by hand delivery to Complaint Counsel, listed below:

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