

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,

Respondent.

Docket No. 9378

**NON-PARTY THE OHIO WILLOW WOOD COMPANY'S SUPPLEMENTAL MOTION
FOR *IN CAMERA* TREATMENT PURSUANT TO FTC RULE 3.45**

Pursuant to, and in accordance with, the Court's July 6, 2018 Order on Non-Parties' Motions for *In Camera* Treatment ("July 6 Order"), The Ohio Willow Wood Company ("WillowWood") respectfully moves the Court to enter an Order granting *in camera* treatment of certain WillowWood documents designated by Complaint Counsel and Respondents as exhibits in the administrative hearing. A copy of the proposed order is attached hereto as Exhibit A.

The July 6 Order grants *in camera* treatment for a period of ten years to "the designated portions of the" WillowWood deposition transcripts (PX5106, PX5152, PX5156, and PX5159), but does not specifically reference the deposition transcripts again in its discussion of five-year *in camera* treatment. *See* July 6 Order, at 12-13. WillowWood believes this omission was inadvertent and, therefore, has interpreted the July 6 Order as granting *in camera* treatment for a period of five years to the following testimony: (a) testimony for which WillowWood sought five years of *in camera* treatment, and (b) testimony relating to exhibits for which the Court granted five years of *in camera* treatment but where WillowWood had sought a longer period (e.g., PX03184/RX0862). This is reflected in Exhibit A.

Dated: July 13, 2018

Respectfully submitted,

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EXHIBIT A

UNITED STATES OF AMERICA
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OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of

Otto Bock HealthCare North
America, Inc.,
a corporation,

Respondent.

Docket No. 9378

**[PROPOSED] ORDER ON NON-PARTY THE OHIO WILLOW WOOD COMPANY'S
MOTION FOR *IN CAMERA* TREATMENT PURSUANT TO FTC RULE 3.45**

Upon consideration of non-party The Ohio Willow Wood Company's Motion for *In Camera* Treatment and pursuant to the Court's July 6, 2018 Order on Non-Parties' Motions for *In Camera* Treatment, it is HEREBY ORDERED that the following documents and deposition testimony are to be provided *in camera* treatment in accordance with the below:

1. Permanent *in camera* treatment is GRANTED for: RX0535 and RX1043.
2. Indefinite *in camera* treatment is GRANTED for: PX3021/RX0978/RX0838, RX0445, RX0463, RX0542, and RX0982.
3. *In camera* treatment for a period of ten years, to expire on July 1, 2028, is GRANTED for: PX3022/RX0979, RX0494, RX0498, RX0749, RX0983, RX1042, and for the following deposition transcript excerpts:
 - a. PX5106: 27:13-30:1, 35:7-36:9, 39:25-40:1, 41:13-41:16, 67:16-68:2, 68:12-68:14, 69:1-72:18, 74:15-75:20, 76:10-76:21, 77:10-82:3, 82:15-82:18, 83:16-84:5, 84:7-84:7, 84:11-84:20, 85:8-87:25, 88:22-88:25, 89:17-89:18, 89:24-91:19, 92:6-92:8, 94:20-94:25, 96:8-96:13, 100:24-100:25, 102:5-102:8, 103:22-104:3, 105:15-105:18, 107:15-107:23,

108:17-108:20, 109:11-109:25, 111:5-111:13, 113:1-113:6, 116:3-116:12,
 119:5-119:21, 119:24-120:3, 122:17-122:19, 123:10-123:14, 125:20-
 125:21, 125:22-125:22, 127:7-127:7, 127:17-127:18, 131:3-133:23,
 138:19-138:25, 139:18-146:10, 147:3-147:7, 147:22-148:2, 150:7-150:9,
 151:17-151:22, 153:4-155:3, 155:9-155:12, 160:11-160:14, 162:20-
 162:23, 163:6-163:9, 166:1-166:5, 167:5-167:10, 168:14-168:16, 170:7-
 170:12, 172:5-172:7, 174:18-174:21, 181:12-181:14, 181:18-181:21,
 191:22-192:8, 194:9-195:10, 196:17-198:25, 199:8-199:19, 200:14-
 201:25, 202:6-202:14, 202:17-203:17, 213:8-214:15, 214:22-215:3, 215:7-
 215:8, 215:17-218:6, 218:14-219:15, 219:24-220:16, 221:1-221:9, 221:17-
 221:21, 222:1-222:7, 222:21-223:13.

b. PX5152: 18:1-19:2, 19:13-23:16, 168:16-168:19.

c. PX5156: 10:16-10:20, 12:1-12:24, 17:15-17:20, 79:22-82:3, 83:21-83:24,
 84:7-84:9, 85:8-85:10, 87:1-87:3, 88:21-94:16, 95:10-95:11, 95:15-95:18,
 99:21-101:5, 109:14-109:18, 110:5-110:25, 111:6-114:14, 159:21-159:24,
 160:6-162:15, 163:5-163:20, 203:10-205:17, 206:22-206:25, 207:6-207:8,
 210:8-210:24, 212:1-212:18, 215:20-215:23, 216:15-217:6, 220:25-
 221:13, 222:22-226:17.

d. PX5159: 29:3-29:15, 31:1-31:1, 37:19-37:20, 37:24-38:10, 41:15-43:14,
 49:24-53:25, 84:25-85:2, 87:1-92:16, 99:24-100:3, 100:25-104:18,
 105:13-106:5, 140:1-140:7, 140:11-140:12, 140:22-141:7, 176:2-178:3,
 178:6-178:9, 192:23-193:5, 193:11-193:13.

4. *In camera* treatment for a period of five years, to expire on July 1, 2023, is GRANTED for: PX3079, PX3079R, PX3138, PX3179/RX0801, PX3181/RX0780, PX3183, PX03184/RX0862, PX3188/RX0241, PX3190, PX3191, PX3192, PX3193, PX3194/RX0394, PX3196, PX3198, PX3199/RX0760, RX0258, RX0326, RX0495, RX0497, RX0750, and for the following deposition transcript excerpts:

- a. PX5106: 27:9-27:12, 30:23-31:2, 33:14-33:19, 34:1-34:1, 48:16-52:2, 52:11-52:11, 54:7-56:3, 56:10-58:6, 62:3-62:3, 76:22-77:9, 130:21-131:2, 134:2-136:3, 148:3-148:6, 148:14-148:15, 149:13-149:15, 149:19-149:22, 150:2-150:2, 150:10-150:24, 151:1-151:1, 151:10-151:10, 151:12-151:13, 151:23-152:5, 155:16-155:17, 155:22-155:24, 156:8-156:9, 157:16-157:23, 159:19-159:20, 161:1-161:1, 161:18-161:20, 164:11-164:12, 169:3-169:3, 169:4-169:5, 169:12-169:13, 170:13-172:2, 175:10-175:24, 182:4-183:17, 184:11-191:5, 192:9-193:23, 203:23-207:20, 208:2-208:2, 208:5-208:6, 208:12-208:12, 209:13-209:13, 209:16-211:5, 211:24-211:24, 212:11-212:16, and the Confidential references in the word index.
- b. PX5152: 14:23-15:4, 15:8-15:10, 25:8-25:10, 25:24-25:24, 31:24-33:18, 33:22-34:19, 35:16-38:6, 39:21-40:1, 42:9-42:12, 43:17-45:2, 58:5-62:7, 62:21-62:25, 63:5-63:12, 66:13-70:18, 71:6-74:3, 74:11-76:1, 76:9-76:15, 76:20-76:20, 78:1-78:11, 83:9-83:9, 83:13-83:16, 84:4-84:7, 85:18-85:21, 87:5-88:14, 88:19-88:21, 89:5-90:12, 91:18-92:1, 95:5-95:7, 97:12-97:12, 98:15-98:19, 99:2-99:2, 99:11-99:12, 103:19-103:22, 104:19-105:1, 105:6-105:11, 105:25-106:3, 107:6-108:17, 112:1-112:6, 113:11-114:4, 118:10-118:24, 126:10-126:24, 135:9-135:9, 135:16-136:14, 137:16-

138:10, 139:23-140:4, 145:9-145:22, 146:20-146:20, 147:22-148:1, 148:4-148:6, 148:18-150:20, 151:13-151:13, 156:18-157:3, 158:25-159:2, 159:7-159:15, 169:1-169:2, 169:23-170:9, 175:8-175:16, and the Confidential references in the word index.

c. PX5156: 19:3-19:5, 20:17-20:20, 25:16-25:17, 25:20-29:15, 31:16-31:17, 32:8-33:9, 45:6-45:8, 45:11-45:16, 48:3-49:9, 50:20-50:23, 101:19-104:8, 104:24-104:25, 105:1-105:2, 105:8-109:13, 121:10-121:12, 124:13-124:24, 126:1-126:4, 132:21-133:9, 133:14-134:21, 137:23-137:23, 138:7-139:22, 145:12-148:3, 150:13-151:24, 172:5-172:8, 172:13-172:22, 173:11-173:23, 174:2-174:10, 180:9-180:17, 183:21-183:21, 184:8-184:10, 184:13-184:14, 186:16-187:2, 188:13-191:10, 192:14-194:5, 194:8-194:9, 195:14-202:14, 202:23-202:24, 208:14-209:4, 209:9-209:21, 214:5-214:24, and the Confidential references in the word index.

d. PX5159: 19:2-20:11, 23:25-24:1, 24:24-25:1, 25:9-25:21, 33:16-33:16, 44:3-44:6, 45:13-49:20, 55:3-55:4, 57:12-57:15, 58:5-60:21, 61:13-62:25, 64:9-66:18, 67:1-68:13, 69:5-69:16, 71:15-73:7, 74:1-81:4, 81:13-81:21, 83:21-84:22, 86:1-86:25, 99:7-99:14, 107:2-107:12, 107:17-107:20, 108:9-108:25, 109:18-111:14, 113:6-113:6, 113:20-114:8, 115:25-116:11, 117:7-117:18, 118:5-122:9, 122:23-125:25, 127:10-127:25, 128:16-128:16, 130:22-131:20, 134:23-135:5, 135:23-135:25, 142:25-145:8, 145:18-147:6, 150:24-150:24, 151:13-151:13, 151:14-151:14, 151:19-152:19, 153:12-153:21, 154:5-154:5, 154:23-154:23, 154:25-154:25,

161:8-161:13, 163:23-164:1, 166:17-173:14, 179:20-182:4, 194:5-194:9,
194:23-194:25, and the Confidential references in the word index.

ORDERED:

D. Michael Chappell
Chief Administrative Law Judge

Dated: _____, 2018.

CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2018, I filed the foregoing documents using the FTC's E-Filing System, which will send notification of such filing to:

Office of the Secretary
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600 Pennsylvania Ave., NW
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The Honorable D. Michael Chappell
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I also hereby certify that I caused a true and correct copy of the foregoing documents to be served upon the following via email:

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Dated: July 13, 2018

By: /s/ Brian Rafkin
Brian Rafkin

Notice of Electronic Service

I hereby certify that on July 13, 2018, I filed an electronic copy of the foregoing Non-Party The Ohio WillowWood Company's Supplemental Motion for In Camera Treatment, with:

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I hereby certify that on July 13, 2018, I served via E-Service an electronic copy of the foregoing Non-Party The Ohio WillowWood Company's Supplemental Motion for In Camera Treatment, upon:

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