

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

_____)
In the Matter of)
)
Altria Group, Inc.)
a corporation,)
)
and)
)
JUUL Labs, Inc.)
a corporation.)
_____)

Docket No. 9393

**NON-PARTY LOGIC TECHNOLOGY DEVELOPMENT LLC'S
MOTION FOR *IN CAMERA* TREATMENT**

Pursuant to Rule 3.45 of the Federal Trade Commission's Rules of Practice, 16 C.F.R. § 3.45(b), non-party Logic Technology Development LLC ("Logic") respectfully moves this Court for *in camera* treatment of certain competitively sensitive, confidential business documents (the "Confidential Documents") produced by Logic and designated as administrative trial exhibits by the Federal Trade Commission ("FTC").¹ See Letter from the FTC dated April 19, 2021 (attached as Exhibit A). Logic asks the Court to grant *in camera* treatment of these documents for a five-year period. Logic 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.

¹ The FTC served a subpoena and CID upon JT International U.S.A., Inc. ("JTI USA") on May 2, 2019 in connection with the investigation that preceded this action. Juul Labs, Inc. on September 14, 2020 and the FTC on September 24, 2020 each subsequently served a subpoena *duces tecum* upon JTI USA. Logic is the corporate affiliate of JTI USA responsible for the marketing and sale of e-cigarette products. Logic responded to Juul's and the FTC's subpoenas and Logic seeks protection for the competitively sensitive and confidential Logic or JTI USA documents included by the FTC on its exhibit list.

In camera treatment is necessary to prevent Juul and other competitors of Logic from gaining access to Logic’s most competitively sensitive information.²

In support of this motion, Logic relies on the Declaration of Brendan LeMoult, attached as Exhibit B, which provides additional details about the Confidential Documents.

I. The Confidential Documents

The FTC informed Logic that it intends to offer sixteen Logic documents into evidence at the upcoming administrative trial, all of which Logic designated confidential under the protective order at the time it made its production. Of the sixteen documents, Logic seeks *in camera* treatment for the entirety of only four of the documents (PX3123, PX3201, PX3206, and PX3209), for Paragraphs 13, 17, 18, 20, 21, 28, 29, 30, 31, and 32 of PX8007, the declaration of a former JTI USA employee, and for limited portions of two further documents (PX3124 and PX3199).

Exhibit No.	Begin Bates	End Bates	Date	Title
PX3123	JTI-000028	JTI-000049	5/13/2019	Strategic Plan Confirmation
PX3124	LOGIC-00015333	LOGIC-00015334	12/20/2018	Email string re “Comment?”
PX3199	LOGIC-00017364	LOGIC-00017364	10/25/2018	Email string re “Internal & External Comm: Altria/Nu Mark/FDA
PX3201	LOGIC-00059029	LOGIC-00059208	6/7-8/2018	JT Visit – Iwai-san
PX3206	JTI-000064	JTI-000064	4/2019	Latest Contract Status -- \$930M Under Budget PMTA
PX3209	LOGIC-00011770	LOGIC-00011840	5/30/2019	Logic Update
PX8007			3/29/2020	Declaration of Anthony Hemsley

A complete copy of each of the four Confidential Documents for which Logic seeks *in camera* treatment in its entirety is attached as Exhibit C. An unredacted copy of each of the exhibits for

² As discussed below, Logic also seeks limited redaction of phone numbers and email addresses (but not employee names) from the following documents: PX3124, PX3125, PX3126, PX3127, PX3128, PX3129, PX3130, PX3131, PX3132, PX3199, and PX3200.

which Logic seeks to redact limited portions because they contain competitively sensitive or sensitive personal information (phone numbers and email addresses) is attached as Exhibit D. And proposed redacted copies of these exhibits are attached as Exhibit E.

II. Legal Standard

Under Commission Rule 3.45(b), an Administrative Law Judge may order that material offered into evidence be placed *in camera* “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 the Matter of Otto Bock HealthCare N. Am., Inc.*, 2018 WL 2491602, at *1 (July 2, 2018) (quoting *General Foods Corp.*, 1980 FTC LEXIS 99, at *10 (Mar. 10, 1980)); *In the Matter of 1-800-Contacts, Inc.*, 2016 FTC LEXIS 146, at *2 (Aug. 8, 2016).

In camera treatment is routinely granted for competitively sensitive business records, including documents revealing financial metrics such as costs, margins, and revenues, competitive positioning, strategic plans, and marketing and pricing strategies. *See, e.g., 1-800 Contacts*, 2016 FTC LEXIS 146, *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, *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). When *in camera* treatment is granted for these types of business records, it is typically provided for two to five years. *See*

Otto Bock, 2018 WL 3491602, at *3; *North Texas Specialty Physicians*, 2004 FTC LEXIS 109, at *2.

III. Argument

Logic, a third party to this litigation, requests *in camera* treatment for reasons of competitive sensitivity for the entirety of only four of the sixteen documents identified as administrative trial exhibits by the FTC (PX3123, PX3201, PX3206, and PX3209), as well as for limited portions of PX3124, PX3199, and PX8007. This narrowly tailored request is focused on specific material the disclosure of which to the public and to Logic’s competitors would cause competitive harm to Logic. As discussed in the attached Declaration of Brendan LeMoult (Exhibit B), these documents reveal business strategies, financial reports, performance reviews, pricing analyses and strategies, marketing plans, supply chain information, business development strategies, and market assessments that Logic does not share outside the company, and limits internal dissemination to those with a need to know the information. Logic would suffer competitively if this information were made available through these proceedings to its competitors. The potential “loss of business advantage” from the disclosure of these documents is the kind of “clearly defined, serious injury” that supports the *in camera* treatment Logic requests. *See In re Dura Lube Corp.*, 1999 FTC LEXIS 255, at *7 (Dec. 23, 1999). Logic’s competitive vulnerability in an industry dominated by Juul makes the potential for harm from the disclosure of its competitively sensitive information particularly acute. *See* LeMoult Declaration (Exhibit B) ¶ 3.

Logic’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*, 58 F.T.C. 1184, 1186, 1961 FTC LEXIS 368 (Mar. 14, 1961). This is especially

so 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. Corp.*, 103 FTC 500, 500 (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.”). Logic’s third-party status therefore weighs in favor of granting *in camera* status for the Confidential Documents.

In addition to the protection that Logic seeks for the Confidential Documents, Logic also seeks to redact as sensitive personal information phone numbers and email addresses (but not the names) of individuals involved in the communications reflected in PX3124, PX3125, PX3126, PX3127, PX3128, PX3129, PX3130, PX3131, PX3132, PX3199, and PX3200. The redaction of email addresses is warranted here where the redactions will have no impact on the substance of the communications and the email addresses of those involved in the communications are not relevant to the issues in the case. *See In re LabMD, Inc.*, 2014 FTC LEXIS 127 (May 6, 2014) (permitting the redaction of addresses as sensitive personal information); *In re Basic Research, LLC*, 2006 FTC LEXIS 14, at 5-6 (Jan. 25, 2006) (permitting the redaction of information particular consumers' names or other personal data concerning when it was not relevant).

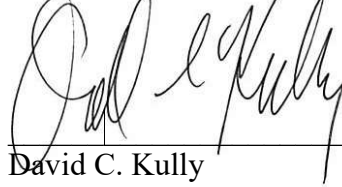
IV. Conclusion

For the reasons set forth above and in the accompanying Brendan LeMoult Declaration, Logic respectfully requests that this Court (1) protect Logic’s competitively sensitive information by granting *in camera* treatment for PX3123, PX3201, PX3206, and PX3209, and portions of PX3124, PX3199, and PX8007 (as reflected in the redactions shown in Exhibit E); (2) permit Logic to redact as sensitive personal information phone numbers and email addresses that appear in PX3124, PX3125, PX3126, PX3127, PX3128, PX3129, PX3130, PX3131,

PX3132, PX3199, and PX3200 (as reflected in the redactions shown in Exhibit E). Logic requests *in camera* treatment for these materials for five years from the date of this Order.

Dated: May 7, 2021

Respectfully submitted



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*Counsel for Logic Technology
Development LLC*

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

_____)	
In the Matter of)	
)	
Altria Group, Inc.)	
a corporation,)	
)	Docket No. 9393
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)	
JUUL Labs, Inc.)	
a corporation.)	
_____)	

[PROPOSED] ORDER GRANTING *IN CAMERA* TREATMENT

Upon consideration of non-party Logic Technology Development LLC’s Motion for *In Camera* Treatment, it is HEREBY ORDERED that, for five years from the date of this Order, PX3123, PX3201, PX3206, and PX3209, are granted *in camera* treatment in their entirety, and PX3124, PX3125, PX3126, PX3127, PX3128, PX3129, PX3130, PX3131, PX3132, PX3199, PX3200, and PX8007 are granted *in camera* treatment for the portions redacted as reflected in Exhibit E to Logic’s Motion.

ORDERED:

Hon. D. Michael Chappell
Chief Administrative Law Judge

Date: _____

CERTIFICATE OF SERVICE

I hereby certify that, on May 7, 2021, I filed the foregoing Motion for *In Camera* Treatment electronically using the FTC's E-Filing System, which will send notification of such filing to:

Office of the Secretary
Federal Trade Commission
Constitution Center
400 Seventh Street, .S.W., Suite 5610
Washington, DC 20024
electronicFilings@ftc.gov

The Honorable D. Michael Chappell
Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave., NW, Room H-110
Washington, DC 20580

I further certify that I delivered via electronic mail a copy of the foregoing document to:

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Dated: May 7, 2021

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*Counsel for Logic Technology
Development LLC*

EXHIBIT A

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

WASHINGTON, D.C. 20580

Bureau of Competition
Mergers II Division

April 19, 2021

VIA EMAIL TRANSMISSIONDavid Kully
Holland & Knight LLP
800 17th Street N.W., Suite 1100
Washington, DC 20006RE: *In the Matter of Altria Group Inc. and JUUL Labs, Inc., Docket No. 9393*

Dear Dave:

This letter provides 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. For your convenience, a copy of the documents and testimony will be sent to you in a separate email with an FTP link.

The administrative trial is scheduled to begin on June 2, 2021. All exhibits admitted into evidence become part of the public record unless Administrative Law Judge D. Michael Chappell 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 Chappell may order that 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 May 7, 2021**. A copy of the March 4, 2021 Scheduling Order can be found at <https://www.ftc.gov/enforcement/cases-proceedings/191-0075/altria-groupjuul-labs-matter>.

If you have any questions, please feel free to contact me at 202-326-2539.

Sincerely,

/s/ Michael Lovinger
Michael Lovinger
Counsel Supporting the Complaint

Attachment

Attachment A

Exhibit No.	Bates - Begin	Bates - End	Date	Full Name
PX3123	JTI-000028	JTI-000049	5/13/2019	JTI Presentation: Strategic Plan Confirmation
PX3124	LOGIC-00015333	LOGIC-00015334	12/20/2018	Email from Jerry Loftin to Anthony Hemsley re: Comment?
PX3125	LOGIC-00015560	LOGIC-00015560	12/7/2018	Email from Richard Chandler to Anthony Hemsley re: Altria to discontinue MarkTen and Green Smoke products and refocus on reduced-risk tobacco
PX3126	LOGIC-00015562	LOGIC-00015562	12/7/2018	Email from Nicholas Hay to Richard Chandler, Anthony Hemsley and Michele Maron re: DRAFT: Management Team Note
PX3127	LOGIC-00016100	LOGIC-00016100	11/30/2018	Email from Jerry Loftin to Dilek Akin Lokmanoglu, Anthony Hemsley, James Farrell, et al. re: Altria Juul news
PX3128	LOGIC-00016693	LOGIC-00016694	11/29/2018	Email from Bryan Jones to Jerry Loftin and Anthony Hemsley re: Latest tobacco rumor - Altria to take a significant stake in Juul w/Attach: 20181128_B0AML_MO_Will JUUL become part of the Altria family_8p.pdf
PX3129	LOGIC-00043296	LOGIC-00043297	12/21/2018	Email from Jerome Jaffeux to Anthony Hemsley re: Altria acquires 35% of JUUL Labs for US\$12.8 billion
PX3130	LOGIC-00049777	LOGIC-00049777	12/7/2018	Email from Anthony Hemsley to Richard Chandler, Michele Maron, Nicholas Hay re: DRAFT: Management Team Note
PX3131	LOGIC-00051649	LOGIC-00051650	12/7/2018	Email from Anthony Hemsley to Macius Ramunas, Bryan Jones, Ian Jones re: Altria to Discontinue all MarkTen and Green Smoke Products
PX3132	LOGIC-00051651	LOGIC-00051652	12/7/2018	Email from Anthony Hemsley to Ian Jones re: DRAFT: Management Team Note
PX3199	LOGIC-00017364	LOGIC-00017365	10/25/2018	Email from Michele Maron to Anthony Hemsley re: Internal & External Comm: Altria/Nu Mark/FDA
PX3200	LOGIC-00017734	LOGIC-00017735	10/25/2018	Email from Jerry Loftin to Anthony Hemsley re: Altria's Letter to FDA on Underage E-vapor Use
PX3201	LOGIC-0059029	LOGIC-00059206	5/19/2017	Email from Taylor Darcy to Miguel Martin re: JT Visit - lawi-san June 7-8. V6.pptx w/Attach: JT Visit - lwai-san June 7-8.V6.pptx
PX3206	JTI-000064	JTI-000064	04/??/19	JTI Document: Latest Contract Status - \$930M Under Budget PMTA - April 2019 Update
PX3209	LOGIC-00011770	LOGIC-00011840	5/30/2019	JTI Presentation: LOGIC UPDATE JTI USA
PX8007	PX8007-001	PX8007-008	3/29/2020	Declaration: Anthony Hemsley (JTI)

EXHIBIT B

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

_____)
In the Matter of)

Altria Group, Inc.)
a corporation,)

and)

JUUL Labs, Inc.)
a corporation.)
_____)

Docket No. 9393

**DECLARATION OF BRENDAN LEMOULT IN SUPPORT OF NON-PARTY
LOGIC TECHNOLOGY DEVELOPMENT LLC'S MOTION FOR *IN CAMERA*
TREATMENT**

I, Brendan LeMoult, hereby declare as follows:

1. I am in-house legal counsel supporting Logic Technology Development LLC (“Logic”). I make this declaration in support of non-party Logic’s 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 produced by Logic (or by its affiliate, JT International U.S.A., Inc.) that the FTC notified Logic it intends to offer into evidence at the upcoming administrative trial, including the documents for which Logic seeks *in camera* protection (the “Confidential Documents”). Based on my position at Logic, my knowledge and review of the Confidential Documents, and my familiarity with the confidentiality protection afforded this type of information by Logic, the disclosure of the Confidential Documents to the public and Logic’s competitors would cause serious competitive injury to Logic.

3. Logic markets and sells e-cigarette (or electronic nicotine delivery systems (“ENDS”)) products. It is the fifth-largest e-cigarette company in the United States and competes in a challenging marketplace with other, much larger companies like Juul. In this environment, Logic goes to great lengths to avoid the disclosure of its internal market assessments and competitive strategies. This market is already challenging enough for Logic, and if its competitors were to have visibility into Logic’s strategic thinking and planning and analysis of the market, its customers, and its competitors, it would allow those competitors to anticipate Logic’s future competitive conduct and use Logic’s information to neutralize or undercut its efforts. Restricting access to Logic’s strategic, marketing, and growth plans is necessary to prevent its competitors from obtaining an unfair market advantage.

4. When Logic prepares competitive assessments and related strategic documents for discussion with its management (or representatives of its parent company), it does not disseminate those documents widely within Logic and typically asks its employees to focus on their tasks at hand and not on the strategic direction of the company.

5. The FTC has informed Logic that it intends to use at the upcoming administrative trial sixteen documents that Logic produced. Of these documents, four (PX3123, PX3201, PX3206, and PX3209) are particularly sensitive and contain confidential business information that should be withheld from disclosure to the public and competitors in their entirety. Three additional documents (PX3124, PX3199, and PX8007) contain competitively sensitive information the public disclosure of which would cause harm to Logic and should therefore be redacted from the documents, as reflected in Exhibit D to Logic's motion.

Exhibit No.	Begin Bates	End Bates	Date	Title
PX3123	JTI-000028	JTI-000049	5/13/2019	Strategic Plan Confirmation
PX3124	LOGIC-00015333	LOGIC-00015334	12/20/2018	Email string re "Comment?"
PX3199	LOGIC-00017364	LOGIC-00017364	10/25/2018	Email string re "Internal & External Comm: Altria/Nu Mark/FDA
PX3201	LOGIC-00059029	LOGIC-00059208	6/7-8/2018	JT Visit – Iwai-san
PX3206	JTI-000064	JTI-000064	4/2019	Latest Contract Status -- \$930M Under Budget PMTA
PX3209	LOGIC-00011770	LOGIC-00011840	5/30/2019	Logic Update
PX8007			3/29/2020	Declaration of Anthony Hemsley

6. PX3123 is a presentation of components of JTI USA's strategic plan that includes information concerning Logic's prices, market position, and competitive pressures, its assessment of competitors, and its predictions of the likely development of the e-cigarette market. It also contains sensitive information concerning pricing in the traditional cigarette market that is competitively sensitive and likely of little relevance to the issues in these proceedings. Logic does not share this information outside of the company or widely within Logic's business, and its disclosure publicly and to Logic's competitors would undercut Logic's ability to compete effectively and result serious harm to Logic.

7. PX3124 contains an e-mail regarding Logic's business development strategies and targets for acquisitions and business deals. Logic does not share this information outside of the company (other than as necessary with its corporate parent) or widely within Logic's business, and its disclosure publicly and to Logic's competitors would undercut Logic's ability to compete effectively and result in serious harm to Logic.

8. PX3199 contains an e-mail regarding Logic's strategy for PMTA filings and what products it will submit for PMTA purposes. Logic keeps the details of its PMTA efforts and progress confidential because it would reveal information about the nature of Logic's anticipated product offerings and the time at which it might be able to bring those products to market. If disclosed, this information could provide Logic's competitors a window into Logic's business

strategy that they could use to disadvantage Logic in the marketplace resulting in serious harm to Logic.

9. PX3201 contains a presentation concerning Logic's business prepared for a visit by an executive with its parent company. It includes a detailed discussion of Logic's assessment of the e-cigarette market, its prices, position, pressures, performance and plans, its strategies concerning navigation of the regulatory environment in the United States, and its observations concerning its competitors' activities, strengths, and weaknesses. Logic does not share this information outside of the company (other than as necessary with its corporate parent) or widely within Logic's business, and its disclosure publicly and to Logic's competitors would undercut Logic's ability to compete effectively and result in serious harm to Logic.

10. PX3206 describes the status of and costs associated with Logic's efforts to comply with the PMTA process, a significant regulatory hurdle in the United States. Logic keeps the details of its PMTA efforts and progress confidential because it would reveal information about the nature of Logic's anticipated product offerings and the time at which it might be able to bring those products to market. The information in PX3206 about the costs incurred by Logic in connection with the PMTA process also would, if disclosed, provide its competitors a window into Logic's cost structure, vendors, and processes that they could use to disadvantage Logic in the marketplace, resulting in serious harm to Logic.

11. PX3209 provides a report for JTI USA of Logic's business activities, sales volumes, marketing initiatives, market pressures, and plans and potential opportunities. It also reveals Logic's assessments of the market and of its competitors. Logic does not share this information outside of the company (other than as necessary with its corporate parent) or widely within Logic's business, and its disclosure publicly and to Logic's competitors would undercut Logic's ability to compete effectively and result in serious harm to Logic.

12. PX8007 is a declaration of a former employee of Logic's affiliate company, JTI USA. Paragraphs 13, 17, 18, 20, 21, 28, 29, 30, 31, and 32 contain confidential information concerning Logic's business that it does not share publicly and it would suffer competitive harm if disclosed to its competitors. Paragraphs 13, 17, and 18 discuss the bases for certain marketplace decisions made by Logic, revealing its internal assessments of its customer base, the geographic focus of its business, its business priorities, and certain marketplace impediments it has encountered and continues to try to overcome. Paragraph 20 reveals confidential information concerning the cost of producing Logic's products. Paragraph 21 discusses Logic's distribution strategy. And, in Paragraphs 28 through 32, the declaration describes Logic's business strategy for addressing the PTMA process in the United States and the costs associated with and the status of the process. None of this information is available publicly, and Logic's competitors could take advantage of their visibility into Logic's approach to this regulatory hurdle to further marginalize Logic in the marketplace.

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: May 7, 2021

DocuSigned by:
Brendan LeMout
BBF8C4603CDB4B1...

Brendan LeMout

EXHIBIT C

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

**DOCUMENTS EXCLUDED
FROM PUBLIC VERSION**

EXHIBIT D

Complete copies of documents for which *in camera* treatment is requested only for portions (with proposed redactions shown in Exhibit E)

**DOCUMENTS EXCLUDED
FROM PUBLIC VERSION**

EXHIBIT E

Proposed Redactions

**DOCUMENTS EXCLUDED
FROM PUBLIC VERSION**