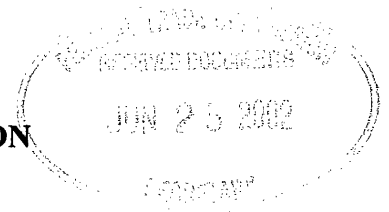


UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION



_____)
IN THE MATTER OF)
MSC.SOFTWARE CORPORATION,) Docket No. 9299
a corporation.)
_____)

**RESPONDENT MSC.SOFTWARE CORPORATION'S MOTION REQUESTING
IN CAMERA TREATMENT OF CERTAIN
HIGHLY CONFIDENTIAL BUSINESS DOCUMENTS**

Respondent, MSC.Software Corporation ("MSC") moves this Court, pursuant to Rule 3.45(b) of the Federal Trade Commission's Rules of Practice, 16 C.F.R. § 3.45(b), for an order directing *in camera* treatment of confidential MSC documents relating to either trade secrets, confidential customer information (*i.e.*, customer lists, negotiation documents, contracts), pricing documents, and strategic planning documents. The specific documents which have been identified by MSC, after a thorough review of Complaint Counsel's and MSC's own Final Exhibit Lists, fall within the Commission's guidelines for appropriate *in camera* treatment, consistent with Commission opinion, such as *H.P. Hood & Sons, Inc.*, 58 FTC 1184 (1961), *Bristol-Myers Co.*, 90 FTC 455 (1977), and *General Foods Corp.*, 95 FTC 352 (1980), a list of these documents are attached as Tabs A and B to the Affidavit of Frank Perna (Attachment A).

Each document identified by MSC contains sensitive information that is "sufficiently secret and sufficiently material to [MSC's] business that disclosure would result in serious competitive injury" and, even when balanced against the "importance of the information in

explaining the rationale of Commission decisions” warrants *in camera* treatment. *General Foods Corp.*, 95 FTC at 355. These documents contain confidential information that is paramount to MSC’s business, competitiveness, and profitability in the simulation software, services, and systems markets. The information contained in these documents, by revealing MSC’s strategic, pricing-related and customer-related material, could be used by MSC’s competitors to gain either a technical or tactical advantage. Moreover, the dissemination of the information contained in these documents could also be used by MSC’s customers to gain a tactical advantage when negotiating with MSC for future agreements. Continued confidentiality of these documents is key to maintaining MSC’s ability to develop, market, and sell its simulation software products in this highly competitive market dominated by powerful buyers.

I. LEGAL STANDARD FOR *IN CAMERA* TREATMENT

Pursuant to Rule 3.45(b) of the Federal Trade Commission’s Rules of Practice, 16 C.F.R. § 3.45(b), a party may obtain *in camera* treatment of a document whose disclosure will adversely affect the requesting party, resulting “in a clearly defined, serious injury to the ... corporation requesting *in camera* treatment.” 16 C.F.R. § 3.45(b). According to well-established Commission case law, establishing that a “serious injury” would ensue with disclosure requires a demonstration that serious and irreparable harm will result from the Court’s publication of the confidential documents. Meeting such a standard requires applicants to make a clear showing that the information concerned is sufficiently secret and sufficiently material to their business that disclosure would result in serious competitive injury. *See, Bristol-Myers Co.*, 90 FTC 455 (1977), *General Foods Corp.*, 95 FTC 352 (1980)

In determining the secret nature and the materiality of the requested documents, courts have sought guidance from the Restatement of Torts, finding it “instructive.” *Bristol-Myers Co.*,

90 FTC at 456. Accordingly, the following factors have been weighed in considering both secrecy and materiality: “(1) the extent to which the information is known outside of the business; (2) the extent to which it is known by employees and others involved in his business; (3) the extent of the 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.” Restatement of Torts § 757, Comment b at 6 (1939)

Recently, the Commission has addressed the issue of defining the “serious injury.” It determined that the loss of a business advantage is a “good example of a ‘clearly defined, serious injury.’” *Hoechst Marion Russel, Inc.*, 2000 F.T.C. LEXIS 138, at *6 (2000)

II. DISCLOSURE OF THE HIGHLY SENSITIVE DOCUMENTS FOR WHICH MSC SEEKS *IN CAMERA* TREATMENT WOULD CAUSE “SERIOUS INJURY”

MSC’s technological development documents. As a company operating in the high-tech computer industry, MSC possesses many documents that pertain to the company’s research and development plans. These may include benchmarking studies, enhancement reports, actual computer code, joint development projects, and program glitches. The protection of such documents is essential to MSC’s success and, perhaps, survival.

For example, CX-2165 is a Statement of Work for MSC.Nastran noise, vibration, and harshness enhancements. This document contains a project overview, technical specifications, and testing procedures, all of which are critical to the development of the NVH enhancements. If this information were obtained by a competitor, it would seriously injure MSC’s ability to capitalize on its technological initiative. Similarly, CX-2094, entitled “HSC-12 SRS/SDD

[Software Requirements Specifications & Software Design Descriptions] for Integration of UAI QUAD/TRIAR into MSC.Nastran,” would be devastating to MSC if in the public domain. This very detailed technological document delineating the modifications made to MSC’s source code and the attendant peer review. A competitor could use this document as a blueprint for creating a code to compete with MSC. MSC’s substantial investment in developing its code would be wasted.

Because of the fundamental necessity and importance of such technological documents to the operation and competitiveness of MSC, MSC requests that all documents designated as “technological development documents” be granted *in camera* treatment in perpetuity.

MSC’s strategic corporate planning documents. Equally important to the viability of any company is its strategic planning documents. It is here that the company lays out its future development and strategy. The disclosure of this type of document would be particularly damaging to MSC because these documents detail the company’s future plans for new technology and new marketing strategies. Their publication would vitiate MSC’s initiative while providing its competitors with a “free ride.”

Complaint Counsel’s exhibit number 2245, “MSC Dassault Systemes Strategy Plan,” is representative of the strategic corporate planning document. This document provides the background, as well as the strategy and future plans of the alliance. Again, should competitors be privy to such confidential information, it could prevent MSC from realizing the full value of its investment, as the competitor could use the “inside information,” to capitalize on the labors of MSC and Dassault.

Similarly, CX-14 is an industry strategic plan that contains substantial amount of inside information. This “Aerospace Strategic Plan” comments on industry dynamics and MSC’s plans for the next five years. Again, should competitors have access to this confidential information, it could hurt MSC’s competitive standing. As result, MSC is requesting that documents identified as “strategic corporate planning documents” be granted *in camera* treatment for a period of five years.

MSC’s sales and marketing initiatives documents. This category of documents pertains specifically to sales and marketing, obviously a critical area to any business. As a result, MSC’s strategic planning documents for its sales and marketing departments are highly valued and protected. Disclosure of such documents would expose MSC’s policies and strategies to its competitors and customers, depriving MSC of a level playing field when competing for sales in the market.

MSC’s document entitled “Automotive Review,” CX-2237, provides an example of those documents relating to marketing in a particularly industry. This presentation highlights activities, achievements, and future goals, while also specifically addressing the sales and marketing needs of the key customers in the automotive area. The information contained in MSC’s analytical perspective of the automotive market segment is invaluable to a competitor, and it provides a roadmap as to what is working, and what is not. This document represents considerable work product and it would be unfair for it to be released to those who could use it their advantage against MSC. *See also, e.g.,* “Three-Year Growth Plan Aerospace Applications Business Unit,” CX-2324. For these reasons, MSC requests that documents designated as “sales and marketing initiative documents” be granted *in camera* treatment for a period of five years.

MSC's pricing strategy documents. MSC documents containing pricing data must be treated with caution if, for no other reason, to protect the interests of the general public. If the information contained in pricing documents, such as price books, quotations, actual contracts, were revealed to MSC's competitors, then market competition in the simulation software industry would decline, MSC's competitors would know MSC's price-points, and would then price themselves accordingly, to the detriment of MSC. The customer would not be the beneficiary of such knowledge, MSC's competitors would.

MSC's Price Books, *see, e.g.*, CX-1530, fall squarely in this category of pricing strategy documents. These price books list all of MSC's pricing options for each of its products. Similarly, CX-1629 is a compilation of e-mails sent among various MSC personnel discussing pricing strategies for various MSC products. Again, should this type of information be disclosed to the public, competitors could use this information to their advantage and to MSC's detriment. For this reason, MSC requests that any document designated as a "pricing strategy document" be granted *in camera* treatment for a period of five years.

MSC's customer-specific documents. Given MSC's presence in a retail and service industry, it is not surprising that MSC possesses a large number of customer-specific documents. -- documents ranging from contracts to customer requested enhancements, to proposals, to benchmarks. Part of MSC's success is attributable to its decades of work aimed at building formidable simulation software tools and forging solid customer and strategic relationships. Documents that were created either for such customers, pursuant to non-disclosure agreements, or in order to service such customers, are highly confidential to MSC's ongoing business. If competitors were privy to the inner workings of these long-established relationships, it would give them an unfair advantage in trying to attract new, i.e., MSC's customers.

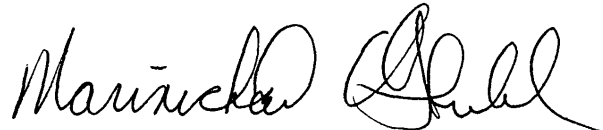
Finally, the “MSC.Software Internal Justification and Proposed Strategy for Renegotiating the MSC.Nastran Agreement with Ford Motor Company,” CX-1812, provides an example of a customer-specific strategic document worthy of *in camera* protection by this Court. This document outlines MSC’s efforts at servicing and maintaining a long-term customer. To reveal the strengths and weaknesses of such a relationship to all of MSC’s competitors would expose MSC’s Achilles’ heel -- MSC’s competitors would have an unfair advantage knowing exactly where to attack MSC. *See also, e.g.*, CX-2205 (presentation entitled “GM Products for 2000” (detailing GM-specific product developments). Therefore, MSC requests that all documents designated as “customer specific strategic planning documents” be granted *in camera* treatment for a period of five years.

CONCLUSION

MSC has for several decades drove itself to set the standard and meet the competition in the information technology market. In doing so, MSC has amassed many competitively sensitive and confidential documents, which if disclosed, would result in a “clearly defined, serious injury.” MSC has taken care to maintain the confidential nature of these documents. MSC has spent much time and resources developing its product line and services and building its relationships with third parties. This effort would be sacrificed should MSC’s confidential and proprietary information be disclosed during the course of this hearing. For these reasons and

those articulated in the Affidavit of Frank Perna (Attachment A), MSC respectfully requests that this Court grant the motion directing *in camera* treatment for the designated exhibits referenced herein.

Respectfully Submitted,



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***Counsel for Respondent
MSC Software Corporation***

Dated: June 25, 2002

ATTACHMENT

A

public disclosures of any of this critically sensitive information would be highly detrimental to MSC, for it would provide both MSC's customers and its competitors with a road-map of MSC's technology, its strategies, and its pricing and would cause serious and irreparable harm to MSC resulting in a serious loss of business advantage.

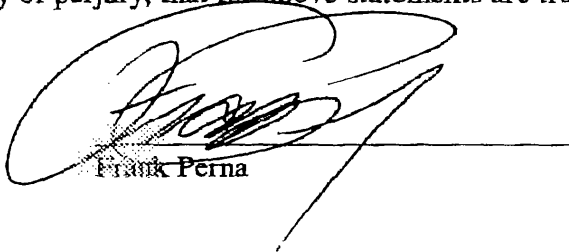
6. Documents containing information relevant to MSC's technological development of its software products are critical to shield from public disclosure, for such information is the core of MSC's business, a company built upon technology. Its successes in the marketplace are wholly related to its core technologies and MSC's continual enhancement of those products. To divulge this proprietary information would reveal MSC's most fundamental trade secret, and the very things upon which the company has been built -- it would allow all of MSC's competitors (which include its customers, to the extent that they use in-house codes) to prey on decades of MSC's effort.
7. Documents containing information relevant to MSC's strategic corporate planning represent MSC's corporate vision for the foreseeable future and cover strategic partnerships, major company-wide changes in pricing, technology, or product offerings. These documents are the foundation of its corporate strategy.
8. Documents containing information relevant to MSC's sales and marketing initiatives are basically strategic planning documents that are targeted specifically to sales and marketing efforts of the company. Disclosing these documents would expose MSC's policies and strategies to its competitors and customers, thereby stripping MSC of a level playing field.
9. Documents containing information relevant to MSC's strategies and pricing of its software products, services, and maintenance are important to MSC's business, competitiveness, and profitability. Were a competitor to know with certainty (as opposed to rumors) the pricing and discounting policies of MSC, then competition for these accounts would cease, and MSC's competitors would have gained an advantage at the expense of MSC.
10. Documents containing information relevant to MSC's customer base, including, its strategic plans with regard to its customers and its negotiations with specific customers, are critical to MSC's profitability and competitiveness. These documents are generally customer-specific contracts, amendments, and sales and marketing documents. Such information is critical to MSC's maintaining its hard-earned position in the simulation software market. Publication of these documents would allow MSC's competitors free access to MSC's confidential relationships, which were created through many years of effort.
11. Prior to this administrative proceeding, the information contained in the documents identified by MSC for *in camera* treatment have been revealed only to appropriate MSC personnel and any contracting parties to the particular documents. MSC's business is the marketing and sales of its products through customer interactions and the information contained in many of these documents is critical to maintaining and fostering these business relationships. Therefore, the confidential information contained in such

documents is vital to the future viability of MSC business. If this information were revealed, it could be used by either MSC's competitors or its customers to their distinct advantage. Such information is not in the public domain and cannot be obtained through other means.

12. As such, the documents at issue in this Motion Requesting *In Camera* Treatment are sensitive and material to MSC's business, competitiveness, and profitability. Disclosure of the information contained in these documents will result in loss of business advantage and serious irreparable injury to MSC.

I declare, under penalty of perjury, that the above statements are true and correct.

This 25th day of June, 2002
Santa Ana, California

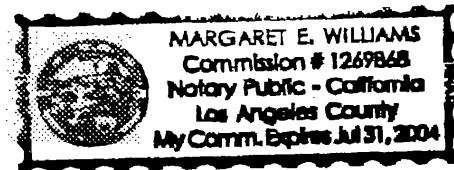

Frank Perna

Subscribed and sworn to me at the

City/County of Los Angeles, State of California this 25th day of June, 2002.

Signature Margaret E. Williams

My commission expires: 7/24/04



TAB A

IN RE MSC.SOFTWARE CORPORATION (FTC DOCKET #9299)
Attachment A to Affidavit of Frank Perna

CX	EXHIBIT NUMBER	DATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	13	MSC-06 000110	strategic corporate planning document
CX	14	MS-0001999	strategic corporate planning document
CX	15	MSC-02 002245	sales and marketing initiatives document; strategic corporate planning document
CX	19	MS-0001511	strategic corporate planning document
CX	20	MS-0001420	sales and marketing initiatives document
CX	21	MS-0002331	sales and marketing initiatives document
CX	22	MSC-23 001408	sales and marketing initiatives document
CX	23	MSC-18 032806	strategic corporate planning document; technological development document
CX	24	MSC-18 033033	sales and marketing initiatives document; strategic corporate planning document
CX	25	MSC-25 005840	pricing strategy document; customer-specific strategic planning document
CX	1426	Box 14 pdf 5482	customer-specific strategic planning document
CX	1428	Box 14 pdf 5504	customer-specific strategic planning document
CX	1431	Box 14 pdf 5510	customer-specific strategic planning document
CX	1432	Box 14 pdf 5513	customer-specific strategic planning document
CX	1436	Box 14 pdf 5604	customer-specific strategic planning document
CX	1437	Box 14 pdf 5605	customer-specific strategic planning document
CX	1438	Box 14 pdf 5614	customer-specific strategic planning document
CX	1439	Box 14 pdf 5615	customer-specific strategic planning document
CX	1440	Box 14 pdf 5628	customer-specific strategic planning document
CX	1442	Box 14 pdf 5632	customer-specific strategic planning document
CX	1443	Box 14 pdf 5709	customer-specific strategic planning document
CX	1444	Box 14 pdf 5711	customer-specific strategic planning document
CX	1445	Box 14 pdf 5712	pricing strategy document; customer-specific strategic planning document
CX	1446	Box 14 pdf 5716	pricing strategy document; customer-specific strategic planning document
CX	1448	Box 14 pdf 5724	customer-specific strategic planning document; pricing strategy document
CX	1449	Box 14 pdf 5742	customer-specific strategic planning document
CX	1450	Box 14 pdf 5749	customer-specific strategic planning document
CX	1451	Box 14 pdf 5751	customer-specific strategic planning document; pricing strategy document
CX	1458	CD Box 1 #745	pricing strategy document; customer-specific strategic planning document
CX	1462	CD Box 12 #4179	customer-specific strategic planning document
CX	1463	CD Box 14 #5483	customer-specific strategic planning document
CX	1464	CD Box 14 #5484	customer-specific strategic planning document
CX	1465	CD Box 14 #5505	customer-specific strategic planning document
CX	1471	CD Box 12 #5615	customer-specific strategic planning document
CX	1472	CD Box 12 #5628	customer-specific strategic planning document
CX	1474	CD Box 12 #5632	customer-specific strategic planning document
CX	1475	CD Box 12 #5633	customer-specific strategic planning document
CX	1476	CD Box 12 #5673	customer-specific strategic planning document
CX	1478	CD Box 12 #5677	customer-specific strategic planning document
CX	1480	CD Box 12 #5697	customer-specific strategic planning document
CX	1481	CD Box 12 #5709	customer-specific strategic planning document
CX	1482	CD Box 12 #5711	customer-specific strategic planning document
CX	1483	CD Box 12 #5716	customer-specific strategic planning document
CX	1484	CD Box 12 #5724	Email from Louwers to Blakely summarizing the potential agreement.
CX	1485	CD Box 12 #5749	customer-specific strategic planning document
CX	1486	CD Box 12 #5751	customer-specific strategic planning document

IN RE MSC.SOFTWARE CORPORATION (FTC DOCKET #9299)

Attachment A to Affidavit of Frank Perna

CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	1528	MS-0000056	Proposal to Acquire MARC Analysis Research Corporation, dated April 1999.
CX	1529	MS-0000070	E-Mail with subject "Fwd: Price Increases" from Ken Blakely to Hal Mattson dated April 10, 2000 (Beer Ex. 17).
CX	1530	MS-0000071	pricing strategy document
CX	1531	MS-0000131	pricing strategy document
CX	1532	MS-0000183	pricing strategy document
CX	1533	MS-0000231	pricing strategy document
CX	1535	MS-0000276	pricing strategy document
CX	1536	MS-0000318	pricing strategy document
CX	1537	MS-0000362	pricing strategy document
CX	1538	MS-0000420	pricing strategy document
CX	1539	MS-0000485	pricing strategy document
CX	1540	MS-0000553	pricing strategy document
CX	1541	MS-0000625	pricing strategy document
CX	1543	MS-0000717	strategic corporate planning document
CX	1544	MS-0000719	pricing strategy document; strategic corporate planning document
CX	1546	MS-0000895	Stock Purchase Agreement dated as of November 3, 1999, relating to the acquisition by MSC Software Corporation of Computerized Structural Analysis & Research Corporation.
CX	1547	MS-0001216	customer-specific strategic planning document
CX	1548	MS-0001219	pricing strategy document; customer-specific strategic planning document
CX	1556	MS-0001863	strategic corporate planning document
CX	1569	MS-0002523	Letter coversheet from Ken Blakely to MSC Software Colleague with attached copy of the Mechanical Roadmap.
CX	1570	MS-0002654	pricing strategy document; strategic corporate planning document
CX	1571	MS-0002665	Letter, dated February 23, 1999, from M. Jeffrey Morgan to UAI Shareholders
CX	1572	MS-0002667	Letter from Jeffrey Morgan to shareholders dated February 16, 1998.
CX	1573	MS-0002730	Presentation entitled "UAI/Nastran Version 20," dated September 1997. (Commission/Ibrahim Ex. 4)
CX	1574	MS-0002745	Presentation, dated February 15, 1999, entitled "Universal Analytics, Inc. Technical Planning."
CX	1575	MS-0002790	Table entitled "Comparison of UAI/Nastran & MSC/Nastran Solution Sequences," dated January 1996. (Commission/Ibrahim Ex. 3)
CX	1576	MS-0002905	Presentation titled "Chrysler Corporation and Universal Analytics, Inc.," dated July 20, 1998
CX	1580	MS-0002952	Presentation entitled "Substructuring Improvement," dated January 1998.
CX	1582	MS-0003014	Presentation entitled "Universal Analytics, Inc. Background Information."
CX	1583	MS-0003055	Presentation entitled "Update on Universal Analytics, Inc." presented to Boeing Military Aircraft on March 12, 1999.
CX	1584	MS-0003084	Presentation entitled "Status Report on Universal Analytics, Inc. Presented to General Motors Corporation," dated July 23, 1998.
CX	1585	MS-0003124	Presentation entitled "Update on Universal Analytics, Inc." presented to General Motors Corporation dated December 16, 1998.
CX	1587	MS-0003142	Presentation entitled "Chrysler Corporation and Universal Analytics, Inc." dated August 11, 1998.
CX	1589	MS-0003245	strategic corporate planning document
CX	1608	MS-0003855	sales and marketing initiatives document
CX	1617	MS-0004426	sales and marketing initiatives document

IN RE MSC.SOFTWARE CORPORATION (FTC DOCKET #9299)

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CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR IN CAMERA TREATMENT
			Letter from Barbara Innes to Rick Barclay with Subject "Request for Quote for Patran and Nastran Software," dated October 18, 1999, with attachments. (Barclay Ex. 21) (Dyer Ex.34)
CX	1635	MS-0008353	
CX	1636	MS-0008413	Table entitled "AG 1st Half FY97 Plan vs. Results."
CX	1643	MS-0009061	technological development document
CX	1644	MS-0009065	technological development document
CX	1645	MS-0009073	customer-specific strategic planning document
			Letter from Ron Dyer to Carlos Bivins Concerning Proposal for Corporate Agreement, dated April 23, 1998.
CX	1646	MS-0009078	
CX	1647	MS-0009082	customer-specific strategic planning document
CX	1648	MS-0009087	customer-specific strategic planning document
			Letter from Ron Dyer to Carlos Bivins dted April 3, 1998 with attached letters and documents.
CX	1649	MS-0009090	
			Letter from Ron Dyer to Carlos Bivins dated March 30, 1998 with attached licence.
CX	1650	MS-0009114	
CX	1651	MS-0009120	customer-specific strategic planning document
CX	1652	MS-0009122	customer-specific strategic planning document
CX	1653	MS-0009125	customer-specific strategic planning document
CX	1654	MS0009697	pricing strategy document
CX	1656	MS0009705	pricing strategy document
CX	1657	MS-0009717	customer-specific strategic planning document
CX	1658	MS-00105013	pricing strategy document
CX	1659	MS-0010562	pricing strategy document
CX	1660	MS-0010607	pricing strategy document
CX	1661	MS-0010659	pricing strategy document
			pricing strategy document; technological development document
CX	1668	MS-0010933	
CX	1669	MS-0011362	customer-specific strategic planning document
			pricing strategy document; customer-specific strategic planning document
CX	1670	MS-0011389	
CX	1673	MS-0015086	customer-specific strategic planning document
CX	1674	MS-0015096	customer-specific strategic planning document
CX	1675	MS-0015100	customer-specific strategic planning document
			pricing strategy document; customer-specific strategic planning document
CX	1676	MS-0015104	
			pricing strategy document; customer-specific strategic planning document
CX	1677	MS-0015110	
			pricing strategy document; customer-specific strategic planning document
CX	1678	MS-0015112	
CX	1679	MS-0015126	customer-specific strategic planning document
CX	1680	MS-0015781	customer-specific strategic planning document
CX	1681	MS-0015782	customer-specific strategic planning document
			Memo from Robert E. Louwers to Ron Dyer with subject "MSC.SuperModel agreement between Boeing and MSC.Software" dated September 28, 1999 and cc'd to Ed Jones, Greg Sikes, Debbie Swedburg.
CX	1682	MS-0015846	
			customer-specific strategic planning document; technological development document
CX	1683	MS-0017228	
			Organizational chart, showing the process to build a model, entitled "747 Preferred Process Figure 4."
CX	1684	MS-0017247	
			customer-specific strategic planning document; technological development document
CX	1685	MS-0017248	
			Memo from E. Johnson to C. Wilson with subject "Trip Report for my Training in the MSC/Seattle Office" dated April 16, 1996. (Jones Ex. 5)
CX	1686	MS-0017262	
CX	1687	MS-0017318	customer-specific strategic planning document
CX	1688	MS-0017354	customer-specific strategic planning document
CX	1689	MS-0017382	customer-specific strategic planning document
CX	1690	MS-0017479	customer-specific strategic planning document

IN RE MSC.SOFTWARE CORPORATION (FTC DOCKET #9299)

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CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	1691	MS-0017481	customer-specific strategic planning document
CX	1692	MS-0017546	customer-specific strategic planning document
CX	1693	MS-0017548	customer-specific strategic planning document
CX	1694	MS-0017558	customer-specific strategic planning document; pricing strategy document
CX	1695	MS-0017558	customer-specific strategic planning document
CX	1696	MS-0017561	customer-specific strategic planning document; pricing strategy document
CX	1697	MS-0017601	customer-specific strategic planning document; pricing strategy document
CX	1698	MS-0017613	customer-specific strategic planning document
CX	1699	MS-0017620	customer-specific strategic planning document
CX	1700	MS-0017693	pricing strategy document
CX	1701	MS-0017698	customer-specific strategic planning document
CX	1702	MS-0017699	customer-specific strategic planning document
CX	1703	MS-0017716	customer-specific strategic planning document
CX	1704	MS-0017784	customer-specific strategic planning document
CX	1705	MS-0017785	customer-specific strategic planning document
CX	1706	MS-0017787	customer-specific strategic planning document
CX	1707	MS-0017815	pricing strategy document
CX	1708	MS-0017853	customer-specific strategic planning document
CX	1709	MS-0017864	customer-specific strategic planning document
CX	1710	MS-0017869	customer-specific strategic planning document
CX	1711	MS-0017875	customer-specific strategic planning document
CX	1712	MS-0017879	customer-specific strategic planning document
CX	1713	MS-0017912	customer-specific strategic planning document
CX	1715	MS-0017918	customer-specific strategic planning document
CX	1716	MS-0017923	customer-specific strategic planning document
CX	1717	MS-0017928	Letter from Edward Jones to Raleen Tautfest, dated June 22, 1995.
CX	1719	MS-0017931	customer-specific strategic planning document
CX	1720	MS-0017932	Handwritten notes entitled "Thursday annual meeting," with notes from June 6, 1995, June 29, and May 17, 1995 attached.
CX	1721	MS-0017939	customer-specific strategic planning document
CX	1722	MS-0017955	customer-specific strategic planning document
CX	1723	MS-0018001	customer-specific strategic planning document
CX	1724	MS-0018003	customer-specific strategic planning document
CX	1725	MS-0018008	customer-specific strategic planning document
CX	1726	MS-0018011	customer-specific strategic planning document
CX	1727	MS-0018012	pricing strategy document; customer-specific strategic planning document
CX	1728	MS-0018017	customer-specific strategic planning document
CX	1729	MS-0018019	customer-specific strategic planning document
CX	1730	MS-0018045	customer-specific strategic planning document
CX	1731	MS-0018061	customer-specific strategic planning document
CX	1732	MS-0018081	customer-specific strategic planning document
CX	1733	MS-0018102	pricing strategy document; customer-specific strategic planning document
CX	1734	MS-0018105	customer-specific strategic planning document
CX	1735	MS-0018118	customer-specific strategic planning document
CX	1736	MS-0018123	pricing strategy document; customer-specific strategic planning document
CX	1737	MS-0018130	pricing strategy document; customer-specific strategic planning document
CX	1738	MS-0018140	customer-specific strategic planning document
CX	1739	MS-0018154	customer-specific strategic planning document; sales and marketing initiatives document

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CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	1740	MS-0018193	customer-specific strategic planning document
CX	1741	MS-0018204	customer-specific strategic planning document
CX	1742	MS-0018215	customer-specific strategic planning document
CX	1743	MS-0018216	customer-specific strategic planning document
CX	1744	MS-0018224	customer-specific strategic planning document
CX	1745	MS-0018229	customer-specific strategic planning document
CX	1746	MS-0018235	customer-specific strategic planning document
CX	1747	MS-0018244	customer-specific strategic planning document
CX	1748	MS-0018272	customer-specific strategic planning document
CX	1749	MS-0018275	customer-specific strategic planning document
CX	1750	MS-0018277	customer-specific strategic planning document
CX	1751	MS-0018321	customer-specific strategic planning document
CX	1752	MS-0018416	customer-specific strategic planning document
CX	1753	MS-0018458	customer-specific strategic planning document
CX	1754	MS-0018484	customer-specific strategic planning document
CX	1755	MS-0018488	pricing strategy document; customer-specific strategic planning document
CX	1756	MS-0018498	customer-specific strategic planning document
CX	1757	MS-0018520	customer-specific strategic planning document
CX	1758	MS-0018568	customer-specific strategic planning document
CX	1759	MS-0018582	customer-specific strategic planning document
CX	1760	MS-0018593	customer-specific strategic planning document
CX	1761	MS-0018597	customer-specific strategic planning document
CX	1762	MS-0018711	customer-specific strategic planning document
CX	1763	MS-0018828	customer-specific strategic planning document
CX	1764	MS-0018842	customer-specific strategic planning document
CX	1765	MS-0018861	customer-specific strategic planning document
CX	1766	MS-0018863	customer-specific strategic planning document
CX	1767	MS-0018871	customer-specific strategic planning document
CX	1768	MS-0018880	customer-specific strategic planning document
CX	1769	MS-0018893	customer-specific strategic planning document
CX	1770	MS-0018953	customer-specific strategic planning document; technological development document
CX	1771	MS-0018954	E-mail from Joe Cieslak to Renee Acevedo with subject "delivery cray t90 69.0. IEEE," dated January 13, 1997 attached.
CX	1772	MS-0018955	E-mail from David Lombard to Renee Acevedo, et al, with subject "Re: delivery cray t90 69.0. IEEE," dated January 13, 1997.
CX	1773	MS-0018957	customer-specific strategic planning document; technological development document
CX	1774	MS-0018958	customer-specific strategic planning document; technological development document
CX	1775	MS-0018959	customer-specific strategic planning document
CX	1776	MS-0018961	customer-specific strategic planning document
CX	1777	MS-0018967	customer-specific strategic planning document
CX	1778	MS-0018969	customer-specific strategic planning document
CX	1779	MS-0018976	customer-specific strategic planning document
CX	1780	MS-0018988	customer-specific strategic planning document
CX	1781	MS-0019805	pricing strategy document; customer-specific strategic planning document
CX	1782	MS-0019811	pricing strategy document; customer-specific strategic planning document
CX	1783	MS-0019815	pricing strategy document; customer-specific strategic planning document
CX	1784	MS-0019854	pricing strategy document; customer-specific strategic planning document
CX	1785	MS-0021017	customer-specific strategic planning document
CX	1786	MS-0021045	customer-specific strategic planning document

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CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	1787	MS-0025379	customer-specific strategic planning document Letter, undated, from Wayne Hamann to Dr. Swami Narayanaswami, re Selection of the MacNeal/Schwendler Corp. Version of NASTRAN as Ford's Sole Solver for Linear CAE, with attachment dated May 29, 1998
CX	1788	MS-0026668	customer-specific strategic planning document
CX	1789	MS-0027564	customer-specific strategic planning document
CX	1790	MS-0027580	customer-specific strategic planning document
CX	1791	MS-0027583	customer-specific strategic planning document
CX	1792	MS-0027597	customer-specific strategic planning document
CX	1794	MS-0027608	customer-specific strategic planning document
CX	1795	MS-0027613	Agreement entitled "Master Agreement between The Mac-Neal-Schwendler Corporation..." dated June 19, 1995.
CX	1796	MS-0028759	customer-specific strategic planning document Letter from Roger A. Brown to the board of directors dated February 12, 1999 with attached related documents.
CX	1797	MS-0032984	List entitled "Recent Examples of Competitive Situations Where MSC.Nastran Won (U.S.)," with table entitled, "MSC Special Projects on Which Former CSAR and UAI Engineering Employees Provided Material Assistance."
CX	1798	MS-0033	Income tax returns entitled "Computerized Structural Analysis & Research Corporation" dated November 1999.
CX	1799	MS-0033013	customer-specific strategic planning document
CX	1800	MS-0033284	customer-specific strategic planning document
CX	1801	MS-0033310	customer-specific strategic planning document
CX	1802	MS-0033316	customer-specific strategic planning document
CX	1803	MS-0033323	customer-specific strategic planning document
CX	1804	MS-0033328	customer-specific strategic planning document
CX	1805	MS-0033329	customer-specific strategic planning document
CX	1806	MS-0033330	Table by Tom Cully dated January 1, 1999.
CX	1807	MS-0033331	Email from Mohan Barbela to Tom Cully with Subject "CPC List and some important info.," dated August 22, 1997. (Cully Ex. 7)
CX	1808	MS-0033332	customer-specific strategic planning document
CX	1809	MS-0033333	customer-specific strategic planning document
CX	1810	MS-0033334	customer-specific strategic planning document
CX	1811	MS-0033353	customer-specific strategic planning document
CX	1813	MS-0033397	customer-specific strategic planning document
CX	1814	MS-0033398	customer-specific strategic planning document
CX	1815	MS-0033407	customer-specific strategic planning document
CX	1817	MS-0033603	customer-specific strategic planning document
CX	1818	MS-0033637	customer-specific strategic planning document
CX	1819	MS-0033724	Memo from Ted Rose to Ombudsman Committee (N. Bakhtiary, J. Lee, G. Moore, K. Ranger) with subject "Space Station Ombudsman Report" dated January 12, 1995.
CX	1820	MS-0033788	customer-specific strategic planning document
CX	1821	MS-0033840	Income tax returns entitled "U.S. Income Tax Return for an S Corporation" with many related forms attached.
CX	1822	MS-0033910	Letter from Roger A. Brown to Computerized Structural dated March 6, 1997 with attached tax returns.
CX	1823	MS-0033983	Income tax returns entitled "U.S. Income Tax Return for an S Corporation."
CX	1824	MS-0034053	Letter from Roger A. Brown to Computerized Structural dated February 15, 1999 with attached income tax forms.
CX	1825	MS-0034129	Letter from David T. Beddow to Richard Dagen with subject "Re: MSC Software Corporation" dated April 9, 2001.
CX	1826	MS-0036207	pricing strategy document; customer-specific strategic planning document
CX	1827	MS-0036213	Email from Swan to Morgane with subject "MSC Product Authorization" dated December 23, 1998.

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CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	1828	MS-0036220	customer-specific strategic planning document
CX	1829	MS-0036225	Email from Joe Baldwin to Bill Torres with subject "MSC newsletter to UTC" dated November 10, 1999.
CX	1830	MS-0036230	customer-specific strategic planning document
CX	1831	MS-0036269	strategic corporate planning document
CX	1832	MS-0036306	customer-specific strategic planning document
CX	1833	MS-0036307	customer-specific strategic planning document
CX	1834	MS-0036311	Newsletter entitled "MSC Software monthly newsletter to United Technologies" dated November 1999.
CX	1835	MS-0036316	Newsletter entitled "MSC Software monthly newsletter to United Technologies" dated December 1999.
CX	1836	MS-0036619	Power Point Presentation entitled "Delivering Computer-Aided Engineering Solutions" by Thomas C. Curry dated November 1997 (Curry Ex. 2).
CX	1837	MS-0001038	Slide Presentation by Frank Perna, Jr., dated March 9, 1999
CX	1838	MS-0001044	MSC Software Corp. Earnings Statement for Two Years Ended December 31, 2000
CX	1839	MS-0001045	Slide Presentation entitled "The Leap 2000 Roadshow" by Frank Perna, Jr.
CX	1842	MS-0001479	Report, dated March 1999, by NASA Johnson Space Center Space Shuttle Program, entitled "Structural Integration Analyses Responsibility Definition for Space Shuttle Vehicle and Cargo Element Developers," including only cover page and Appendix I and N
CX	1844	MS-0001572	Excel spreadsheet, dated Aug. 1, 2000, headed "MSC Mechanical CAD/CAM, CAE & MCAE Market Share" with attached 1999 Daratech publication, stamped received by Frank Perna on Dec. 15, 1999, "Market Trends & Statistics Folio I, CAD/CAE Mechanical Edition"
CX	1845	MS-0001600	MSC Software Corporation Annual Report 1999
CX	1846	MS-0001601	MacNeal-Schwendler Corporation Annual Report 1998 "Simulating Reality"
CX	1847	MS-0001602	MacNeal-Schwendler Corporation Annual Report 1998 "Growth Through Teamwork"
CX	1848	MS-0001603	MacNeal-Schwendler Corporation Annual Report 1997
CX	1849	MS-0001604	MacNeal-Schwendler Corporation Annual Report 1996
CX	1850	MS-0001605	MacNeal-Schwendler Corporation Annual Report 1995
CX	1851	MS-0001673	Charts entitled "Consolidated Summary" and Consolidated (Detailed)" for Budget 2000/FY00
CX	1852	MS-0001731	MSC Software Corporation Form 10-K for the Fiscal Year Ended Dec. 31, 1999
CX	1854	MS-0001999	strategic corporate planning document; sales and marketing initiatives document
CX	1855	MS-0002330	Pros and cons list entitled "Pro/Mechanica vs. MSC/Nastran"
CX	1857	MS-0002340	strategic corporate planning document; sales and marketing initiatives document
CX	1858	MS-0002371	customer-specific strategic planning document
CX	1859	MS-0002375	customer-specific strategic planning document
CX	1860	MS-0002376	customer-specific strategic planning document
CX	1861	MS-0002378	customer-specific strategic planning document
CX	1862	MS-0002431	strategic corporate planning document
CX	1870	MS-0003248	Fax, dated April 7, 1999, from Dr. R. Swamy Narayanaswami to Frank Perna, responding to Perna's April 5, 1999 letter and attaching a letter and Attachments A and B
CX	1881	MS-0006242	Executive Staff Meeting Agenda, June 26, 1995
CX	1883	MS-0006571	Minutes of MacNeal-Schwendler Corp. Executive Staff Meeting, Sept. 16, 1996, dated Oct. 3, 1996
CX	1884	MS-0006980	pricing strategy document

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CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	1885	MS-0008348	pricing strategy document; customer-specific strategic planning document
CX	1887	MS-0008604	Minutes of a Special Meeting of the Board of Directors of MacNeal-Schwendler Corp., May 25, 1999
CX	1888	MS-0008609	Minutes of a Special Meeting of the Board of Directors of the MacNeal-Schwendler Corp., April 26, 1999
CX	1894	MS-0009581	Article entitled "Mechanical CAE Market Forecast to Top \$857.3 Million in '99; Growth Projected at 14.4%" appearing in CAD/CAM, CAE Industry Update, July 1999, by Daratech, Inc.
CX	1895	MS-0009648	Proposal to Acquire MARC Analysis Research Corporation
CX	1896	MS-0010169	pricing strategy document
CX	1897	MS-0026729	customer-specific strategic planning document
CX	1898	MS-0029126	pricing strategy document; customer-specific strategic planning document
CX	1899	MS-0033396	customer-specific strategic planning document
CX	1902	MS-0033444	customer-specific strategic planning document; strategic corporate planning document
CX	1903	MS-0033723	Email, dated March 29, 1995, from Robert Louwers to Tom Vorgitch
CX	1904	MS-0036146	Letter, dated June 18, 2001, from Beddow and Gilman of O'Melveny & Myers to Joseph J. Simons, with attachment entitled Relevant Market Analysis
CX	1907	MS-0036341	Corporate Positioning comparison of Ansys, Inc. with Hibbitt, Karlsson, & Sorensen, dated Jan. 25, 1996
CX	1908	MS-0036343	Corporate Positioning comparison of Ansys, Inc. with MacNeal-Schwendler Corp., dated Jan. 25, 1996
CX	1909	MS-0036345	sales and marketing initiatives document
CX	1910	MS-0036348	Power Point presentation, "ANSYS The Power of Choice"
CX	1911	MS-0036403	Power Point presentation, "ANSYS 5X Products/Direction" -- May 22, 1997 Update -- by Frank J. Marx
CX	1912	MS-0036453	Power point presentation, "Selling ANSYS/LS-DYNA" -- presented by Makarand Kulkarni
CX	1913	MS-0036561	Letter, dated March 5, 2001, from Beddow, Gilman, and Guymon of O'Melveny & Myers to Dagen and McCartney
CX	1914	MS-0036572	MSC White Paper, dated Nov. 28, 2000, by Beddow, Gilman, and Guymon, entitled "The Acquisitions by MSC Software of Universal Analytics, Inc. and Computerized Structural Analysis and Research Corporation were Procompetitive"
CX	1915	MS-9999999	pricing strategy document
CX	1916	MSC 06 282	strategic corporate planning document
CX	1917	MSC 134 0002	customer-specific strategic planning document
CX	1918	MSC 1355	Table entitled "Signature Authorization Table," issued October 1, 1999. (Dyer Ex. 2)
CX	1920	MSC-65 0084018	customer-specific strategic planning document
CX	1921	MSC-70 000338	Email with subject "CSA" from Ken Blakely to "msc.sales", CC: Greg Moore, Hall Mattson, and Lou Greco, dated November 5, 1999
CX	1922	MSC-70 000360	customer-specific strategic planning document
CX	1924	MSC-74 001457	Email with subject: "CSA Transition Policies", from Rick Murphy to Eric Aldridge, et al., dated November 17, 1999
CX	1925	MSC 74 1522	customer-specific strategic planning document
CX	1926	MSC 74 1550	customer-specific strategic planning document
CX	1927	MSC 74 1560	Email with subject "Fwd: RE: [Fwd: [Fwd: Optimization/Correlation]]" from Erwin Johnson to Tom Cully, with email exchange attached, dated October 13, 1999
CX	1929	MSC 74 1787	customer-specific strategic planning document
CX	1930	MSC 74 2017	customer-specific strategic planning document
CX	1932	MSC CD	customer-specific strategic planning document

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CX	EXHIBIT NUMBER	DATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	1933	MSC CD	customer-specific strategic planning document
			Meeting notes to distribution entitled "Executive Staff Meeting Minutes" dated May 16, 1996. (Curry Ex. 6)
CX	1934	MSC D175	(Blakely IH Ex. 10)
CX	1935	MSC-000360	Untitled correspondence to Bob Anderson, Bobby Jefferson, and MSC Attendes dated July 22, 1999. (Torres Ex. 2)
CX	1936	MSC-000362	Untitled correspondence to Stephen O. Hawkins, Bobby L. Jefferson, and Meredith Diver dated March 16, 1999. (Torres Ex. 1)
CX	1937	MSC-01 000174	Press release entitled "MSC Software and Ford Motor Company Announce Multi-Million Dollar Agreement for Unlimited Worldwide Usage of MSC.Nastran" by Todd Evans, dated October 2, 2001.
CX	1938	MSC-01 000228	pricing strategy document; strategic corporate planning document
CX	1939	MSC-01 000324	pricing strategy document; strategic corporate planning document
CX	1940	MSC-01 000414	pricing strategy document
CX	1941	MSC-01 000472	pricing strategy document
CX	1942	MSC-01 000532	pricing strategy document
CX	1943	MSC-02 000304	customer-specific strategic planning document
CX	1944	MSC-02 000312	customer-specific strategic planning document
CX	1945	MSC-02 003291	customer-specific strategic planning document
CX	1946	MSC-02 000336	customer-specific strategic planning document
CX	1947	MSC-02 000347	strategic corporate planning document
CX	1948	MSC-02 000520	Memo from Todd Brown to Ruth Robbins entitled "Interoffice Memorandum" and dated October 31, 1997 with attached fax.
CX	1949	MSC-02 000588	Report titled "Piloting SFE/AKUSMOD Software" by A. Chen, dated January 16, 1998
CX	1950	MSC-02 001473	pricing strategy document; customer-specific strategic planning document
CX	1951	MSC-02 001476	customer-specific strategic planning document
CX	1952	MSC-02 001521	pricing strategy document; customer-specific strategic planning document; strategic corporate planning document
CX	1953	MSC-02 001529	customer-specific strategic planning document
CX	1954	MSC-02 001567	customer-specific strategic planning document
CX	1955	MSC-02 001712	customer-specific strategic planning document
CX	1956	MSC-02 001726	pricing strategy document; customer-specific strategic planning document
CX	1957	MSC-02 001756	customer-specific strategic planning document
CX	1958	MSC-02 001836	customer-specific strategic planning document
CX	1959	MSC-02 001874	customer-specific strategic planning document
CX	1960	MSC-02 001881	customer-specific strategic planning document
CX	1961	MSC-02 001917	customer-specific strategic planning document
CX	1962	MSC-02 001930	customer-specific strategic planning document
CX	1963	MSC-02 001934	customer-specific strategic planning document
CX	1964	MSC-02 001937	customer-specific strategic planning document
CX	1965	MSC-02 001990	Presentation titled "MSC.Nastran Preliminary Contract Proposal", dated October 8, 2000
CX	1966	MSC-02 002008	customer-specific strategic planning document
CX	1967	MSC-02 002012	customer-specific strategic planning document
CX	1968	MSC-02 002033	customer-specific strategic planning document
CX	1969	MSC-02 002040	Notes from GM Meeting, with Tom Tecco, Ali Ozbeki, Dennis Page, John M., Jeff M., Bruce H. and Brian T. present, dated September 21, 2000
CX	1970	MSC-02 002052	customer-specific strategic planning document
CX	1971	MSC-02 002127	sales and marketing initiatives document

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CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	1973	MSC-02 002341	Document entitled "Leadership for the 21st Century A Value Proposition." (Commission/Roach Ex. 3)
CX	1974	MSC-02 002496	strategic corporate planning document
CX	1975	MSC-02 002498	strategic corporate planning document
CX	1976	MSC-02 002560	strategic corporate planning document; technological development document
CX	1977	MSC-02 002669	customer-specific strategic planning document
CX	1978	MSC-02 003620	customer-specific strategic planning document
CX	1979	MSC-02 003835	Cover sheet with "D.H. Brown 11/98," written on the right-hand side, with e-mail from Linda Towles to Doug Roach with subject "Fwd: Internet Line," dated March 3, 1999, attached with forwarded e-mail from Karen Blakely to Linda Towles.
CX	1980	MSC-02 003837	Presentation entitled "Enhancing CAE Effectiveness Final Presentation - The MacNeal-Schwendler Corporation Measuring and Enhancing CAE Effectiveness," by Marc Halpern, dated December 8, 1998.
CX	1981	MSC-02 003916	Memorandum from Dave to Swami, Bill, and Joe dated March 22, 1996 with subject: "Altair/HyperMesh."
CX	1982	MSC-02 003919	customer-specific strategic planning document; technological development document
CX	1983	MSC-02 003952	Fax with subject "CSA/NASTRAN" from Tom Forrest to Wayne Hamann, dated December 20, 1996, with letter attached
CX	1984	MSC-02 003960	customer-specific strategic planning document
CX	1985	MSC-02 004143	customer-specific strategic planning document
CX	1986	MSC-02 004433	Email with subject "Fwd: IAR - Message to MSC Sales and Business Unit Management" from Jane Smith to msc.sales@mscsoftware.com, dated November 29, 2001, with "Q&A" attached
CX	1987	MSC-02 007124	Presentation entitled "Manufacturing Simulation."
CX	1988	MSC-02 007126	Presentation entitled "MSC Engineering-e.com."
CX	1989	MSC-02 007391	customer-specific strategic planning document; sales and marketing initiatives document
CX	1990	MSC-02 007476	customer-specific strategic planning document
CX	1991	MSC-02 007621	Presentation entitled "Aerospace Overview Marketing Meeting," dated February 1999.
CX	1992	MSC-02 007795	strategic corporate planning document
CX	1993	MSC-02 008999	sales and marketing initiatives document
CX	1994	MSC-02 009022	sales and marketing initiatives document
CX	1995	MSC-02 009114	sales and marketing initiatives document
CX	1996	MSC-03 000314	sales and marketing initiatives document
CX	1998	MSC-03 000337	customer-specific strategic planning document
CX	1999	MSC-03 000347	customer-specific strategic planning document
CX	2000	MSC-03 000351	customer-specific strategic planning document
CX	2001	MSC-03 000366	customer-specific strategic planning document
CX	2002	MSC-03 000394	customer-specific strategic planning document
CX	2003	MSC-03 000406	customer-specific strategic planning document
CX	2004	MSC-03 000427	customer-specific strategic planning document
CX	2005	MSC-03 000440	customer-specific strategic planning document
CX	2006	MSC-03 000481	customer-specific strategic planning document; technological development document
CX	2007	MSC-04 000001	customer-specific strategic planning document
CX	2008	MSC-04 000004	pricing strategy document; customer-specific strategic planning document
CX	2009	MSC-04 000013	customer-specific strategic planning document
CX	2010	MSC-04 000025	customer-specific strategic planning document
CX	2011	MSC-04 000055	customer-specific strategic planning document
CX	2012	MSC-04 000067	customer-specific strategic planning document
CX	2013	MSC-04 000070	customer-specific strategic planning document

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CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	2014	MSC-04 000086	pricing strategy document; customer-specific strategic planning document
CX	2015	MSC-04 000108	customer-specific strategic planning document
CX	2016	MSC-04 000114	customer-specific strategic planning document
CX	2017	MSC-04 000116	customer-specific strategic planning document
CX	2018	MSC-04 000120	customer-specific strategic planning document
CX	2019	MSC-04 000170	customer-specific strategic planning document
CX	2020	MSC-04 000171	customer-specific strategic planning document
CX	2021	MSC-04 000818	customer-specific strategic planning document
CX	2022	MSC-04 000188	customer-specific strategic planning document
CX	2023	MSC-04 000307	customer-specific strategic planning document
CX	2024	MSC-04 000391	sales and marketing initiatives document
CX	2025	MSC-04 000399	Presentation titled "MSC.AKUSMOD- The Ideal Tool for Interior Acoustic Applications", dated September, 1999
CX	2026	MSC-04 000432	customer-specific strategic planning document
CX	2027	MSC-04 000434	customer-specific strategic planning document
CX	2028	MSC-04 000629	sales and marketing initiatives document; strategic corporate planning document
CX	2029	MSC-04 000797	customer-specific strategic planning document
CX	2030	MSC-04 000804	sales and marketing initiatives document
CX	2031	MSC-04 000836	customer-specific strategic planning document
CX	2032	MSC-04 000837	customer-specific strategic planning document
CX	2033	MSC-04 000853	customer-specific strategic planning document
CX	2034	MSC-04 000871	customer-specific strategic planning document
CX	2035	MSC-04 000882	customer-specific strategic planning document
CX	2036	MSC-04 000988	customer-specific strategic planning document
CX	2037	MSC-04 001040	customer-specific strategic planning document
CX	2038	MSC-04 001041	customer-specific strategic planning document
CX	2039	MSC-04 001070	customer-specific strategic planning document
CX	2040	MSC-04 001094	customer-specific strategic planning document
CX	2041	MSC-04 001096	customer-specific strategic planning document
CX	2042	MSC-04 001116	customer-specific strategic planning document
CX	2043	MSC-04 001213	customer-specific strategic planning document
CX	2044	MSC-04 001275	sales and marketing initiatives document
CX	2046	MSC-07 000151	customer-specific strategic planning document
CX	2048	MSC-07 000433	customer-specific strategic planning document
CX	2049	MSC-07 000434	strategic corporate planning document
CX	2050	MSC-07 000438	customer-specific strategic planning document
CX	2051	MSC-07 000440	customer-specific strategic planning document
CX	2052	MSC-07 000443	customer-specific strategic planning document
CX	2053	MSC-07 000444	customer-specific strategic planning document
CX	2054	MSC-07 000447	customer-specific strategic planning document
CX	2055	MSC-07 000453	customer-specific strategic planning document
CX	2056	MSC-07 000465	customer-specific strategic planning document
CX	2057	MSC-07 000481	customer-specific strategic planning document
CX	2058	MSC-07 000505	customer-specific strategic planning document
CX	2059	MSC-07 000759	customer-specific strategic planning document
CX	2060	MSC-07 000848	pricing strategy document; customer-specific strategic planning document
CX	2061	MSC-07 001052	customer-specific strategic planning document
CX	2063	MSC-07 001687	customer-specific strategic planning document
CX	2064	MSC-07 001720	technological development document
CX	2065	MSC-07 001729	strategic corporate planning document
CX	2086	MSC-10 000001	customer-specific strategic planning document
CX	2087	MSC-10 000084	customer-specific strategic planning document
CX	2088	MSC-10 000162	customer-specific strategic planning document
CX	2089	MSC-10 000297	customer-specific strategic planning document

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CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	2091	MSC-11 000352	sales and marketing initiatives document
CX	2092	MSC-11 000406	Document titled "Building a Competitive Aerospace Business Through Integrated Product Development"
CX	2094	MSC-127 000117	technological development document
CX	2095	MSC-134 000005	pricing strategy document; customer-specific strategic planning document
CX	2096	MSC-134 000011	customer-specific strategic planning document
CX	2097	MSC-134 000192	customer-specific strategic planning document
CX	2098	MSC-134 002575	sales and marketing initiatives document
CX	2100	MSC-134 004038	pricing strategy document
CX	2101	MSC-134 004038	pricing strategy document
CX	2102	MSC-135 000129	pricing strategy document; customer-specific strategic planning document
CX	2103	MSC-135 000715	customer-specific strategic planning document
CX	2104	MSC-135 001169	customer-specific strategic planning document
CX	2108	MSC-135 002029	strategic corporate planning document
CX	2114	MSC-135 004587	customer-specific strategic planning document
CX	2115	MSC-135 004589	customer-specific strategic planning document
CX	2116	MSC-138 000002	Notes entitled "Speaker's notes for ABU LMA 10-min presentation 8 Feb 98" undated. (Louwers Ex. 4)
CX	2117	MSC-138 000503	customer-specific strategic planning document; sales and marketing initiatives document
CX	2118	MSC-138 000582	customer-specific strategic planning document
CX	2119	MSC-138 000584	customer-specific strategic planning document
CX	2122	MSC-138 002472	customer-specific strategic planning document
CX	2123	MSC-138 002591	customer-specific strategic planning document
CX	2124	MSC-138 002702	customer-specific strategic planning document
CX	2125	MSC-138 002706	pricing strategy document; customer-specific strategic planning document
CX	2126	MSC-138 002726	customer-specific strategic planning document
CX	2127	MSC-138 002769	customer-specific strategic planning document
CX	2128	MSC-138 002831	pricing strategy document; customer-specific strategic planning document
CX	2129	MSC-138 002832	pricing strategy document; customer-specific strategic planning document
CX	2130	MSC-138 002833	pricing strategy document; customer-specific strategic planning document
CX	2131	MSC-138 002834	customer-specific strategic planning document
CX	2132	MSC-138 002835	pricing strategy document; customer-specific strategic planning document
CX	2133	MSC-138 002836	pricing strategy document; customer-specific strategic planning document
CX	2134	MSC-138 002837	pricing strategy document; customer-specific strategic planning document
CX	2135	MSC-138 003608	customer-specific strategic planning document; sales and marketing initiatives document
CX	2136	MSC-138 005063	customer-specific strategic planning document
CX	2137	MSC-138 005426	customer-specific strategic planning document
CX	2138	MSC-138 005501	customer-specific strategic planning document
CX	2139	MSC-138 006426	customer-specific strategic planning document
CX	2140	MSC-138 006587	customer-specific strategic planning document
CX	2141	MSC-138 006616	customer-specific strategic planning document
CX	2142	MSC-138 006824	customer-specific strategic planning document
CX	2146	MSC-138 007860	customer-specific strategic planning document
CX	2147	MSC-138 007861	customer-specific strategic planning document
CX	2148	MSC-138 008591	pricing strategy document; customer-specific strategic planning document
CX	2149	MSC-138 008634	customer-specific strategic planning document
CX	2150	MSC-138 008641	customer-specific strategic planning document

IN RE MSC SOFTWARE CORPORATION (FTC DOCKET #9299)

Attachment A to Affidavit of Frank Perna

CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR <i>IN CAMERA</i> TREATMENT
CX	2151	MSC-145 000252	customer-specific strategic planning document
CX	2152	MSC-145 002036	customer-specific strategic planning document
CX	2153	MSC-145 002134	customer-specific strategic planning document
CX	2154	MSC-149 003155	customer-specific strategic planning document
CX	2156	MSC-149 003335	Email from Rick Murphy to MSC Sales with subject "FYI: MSC Sales & Business Unit Management" dated November 29, 2001.
CX	2157	MSC-149 003363	customer-specific strategic planning document; technological development document
CX	2163	MSC-154 000191	strategic corporate planning document
CX	2164	MSC-154 002720	customer-specific strategic planning document
CX	2165	MSC-160 000031	technological development document
CX	2166	MSC-160 0001368	customer-specific strategic planning document
CX	2167	MSC-160 0001369	customer-specific strategic planning document; technological development document
CX	2168	MSC-160 0001381	technological development document
CX	2169	MSC-160 000167	technological development document
CX	2170	MSC-160 0003168	strategic corporate planning document
CX	2171	MSC-160 000391	sales and marketing initiatives document
CX	2172	MSC-160 000400	sales and marketing initiatives document
CX	2173	MSC-160 000411	sales and marketing initiatives document
CX	2174	MSC-160 000413	sales and marketing initiatives document; strategic corporate planning document
CX	2175	MSC-160 000428	sales and marketing initiatives document; strategic corporate planning document
CX	2176	MSC-160 000433	sales and marketing initiatives document; strategic corporate planning document
CX	2177	MSC-160 000637	sales and marketing initiatives document; strategic corporate planning document
CX	2178	MSC-160 000668	sales and marketing initiatives document
CX	2182	MSC-160 000845	technological development document
CX	2183	MSC-160 000918	strategic corporate planning document
CX	2184	MSC-160 001127	strategic corporate planning document; sales and marketing initiatives document
CX	2185	MSC-160 001160	technological development document
CX	2186	MSC-160 001216	technological development document
CX	2187	MSC-160 001357	technological development document
CX	2188	MSC-160 001359	technological development document
CX	2189	MSC-160 001361	technological development document
CX	2190	MSC-160 001365	technological development document
CX	2191	MSC-160 001368	customer-specific strategic planning document
CX	2192	MSC-160 001369	customer-specific strategic planning document; technological development document
CX	2193	MSC-160 001381	customer-specific strategic planning document; technological development document
CX	2194	MSC-160 001416	Document dated September 1, 1999 with title "Statement of Work Outline for: MSC.NASTRAN Component Mode Synthesis with External Superelements."
CX	2195	MSC-160 001475	customer-specific strategic planning document
CX	2196	MSC-160 001545	sales and marketing initiatives document
CX	2197	MSC-160 001547	technological development document
CX	2198	MSC-160 001582	sales and marketing initiatives document; strategic corporate planning document
CX	2199	MSC-160 001842	strategic corporate planning document
CX	2200	MSC-160 001902	technological development document
CX	2201	MSC-160 002043	technological development document
CX	2202	MSC-160 002181	customer-specific strategic planning document; technological development document
CX	2203	MSC-160 002235	technological development document

IN RE MSC.SOFTWARE CORPORATION (FTC DOCKET #9299)
Attachment A to Affidavit of Frank Perna

CX	EXHIBIT NUMBER	DATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	2204	MSC-160 002386	customer-specific strategic planning document; technological development document
CX	2205	MSC-160 002440	customer-specific strategic planning document; sales and marketing initiatives document
CX	2206	MSC-160 002538	technological development document
CX	2207	MSC-160 002662	Document dated June 27, 2000 with title "Parallel Computing."
CX	2209	MSC-160 003192	sales and marketing initiatives document; technological development document
CX	2210	MSC-160 003370	technological development document
CX	2211	MSC-160 004341	Presentation entitled "MSC.Software Sales Meeting MSC.Linux presented by Greg Sikes.
CX	2213	MSC-160 004426	Presentation entitled "MSC.Nastran Product Clinic" dated January 14, 2001.
CX	2214	MSC-160 005271	Presentation entitled "New Features in MSC.Nastran V70.7" dated December 9, 1999.
CX	2215	MSC-160 005486	sales and marketing initiatives document; strategic corporate planning document
CX	2216	MSC-160 005546	strategic corporate planning document; technological development document
CX	2218	MSC-160 005598	customer-specific strategic planning document
CX	2219	MSC-160 005731	customer-specific strategic planning document; technological development document
CX	2220	MSC-160 005582	Presentation entitled " MSC. Nastran MSC Worldwide Support Meeting," dated May 16, 2001.
CX	2222	MSC-160 006562	sales and marketing initiatives document; strategic corporate planning document
CX	2223	MSC-160 006802	Document dated April 6, 2000 with title "New Features in MSC.Nastran V70.7."
CX	2224	MSC-160 006859	Document dated May 1, 2000 with title "Analysis-Test Reconciliation."
CX	2225	MSC-160 006881	strategic corporate planning document
CX	2226	MSC-160 006964	sales and marketing initiatives document; strategic corporate planning document
CX	2227	MSC-160 006993	technological development document
CX	2228	MSC-160 007003	technological development document
CX	2229	MSC-160 007037	technological development document
CX	2230	MSC-160 007133	sales and marketing initiatives document; strategic corporate planning document
CX	2231	MSC-160 007179	strategic corporate planning document
CX	2232	MSC-160 007184	strategic corporate planning document
CX	2233	MSC-161 00001	Presentation written by Blakely, dated 7/7/98. Describes MSC's worldwide aerospace business. (Dyer Ex.2)
CX	2234	MSC-161 000157	customer-specific strategic planning document
CX	2235	MSC-162 000001	customer-specific strategic planning document
CX	2237	MSC-162 000189	pricing strategy document; customer-specific strategic planning document; sales and marketing initiatives document; strategic corporate planning document
CX	2238	MSC-162 000225	strategic corporate planning document
CX	2241	MSC-162 000356	strategic corporate planning document
CX	2242	MSC-162 000377	strategic corporate planning document
CX	2243	MSC-162 000384	strategic corporate planning document
CX	2244	MSC-162 000424	strategic corporate planning document
CX	2245	MSC-162 000444	strategic corporate planning document
CX	2246	MSC-162 000464	customer-specific strategic planning document
CX	2247	MSC-162 000487	customer-specific strategic planning document
CX	2249	MSC-162 000601	customer-specific strategic planning document
CX	2250	MSC-162 000608	pricing strategy document; customer-specific strategic planning document
CX	2251	MSC-162 000612	customer-specific strategic planning document

IN RE MSC SOFTWARE CORPORATION (FTC DOCKET #9299)

Attachment A to Affidavit of Frank Perna

CX	EXHIBIT NUMBER	DATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	2252	MSC-162 00096	customer-specific strategic planning document; sales and marketing initiatives document
CX	2254	MSC-162 000990	strategic corporate planning document; customer-specific strategic planning document
CX	2255	MSC-162 000991	customer-specific strategic planning document
CX	2256	MSC-162 000992	customer-specific strategic planning document
CX	2257	MSC-162 000994	pricing strategy document
CX	2258	MSC-162 001001	pricing strategy document
CX	2264	MSC-162 001538	strategic corporate planning document
CX	2266	MSC-162 00189	sales and marketing initiatives document
CX	2268	MSC-162 002229	customer-specific strategic planning document
CX	2269	MSC-162 002235	pricing strategy document; customer-specific strategic planning document
CX	2270	MSC-162 002275	Presentation entitled "GE MRAS" dated July 26, 2000.
CX	2276	MSC-162 2787	customer-specific strategic planning document
CX	2278	MSC-164 000251	Chart with titles such as "Total Available Market," "Served Address Market," and "CSAR Stand Alone Performance" dated March 22, 2002. (Greco Ex. 8)
CX	2280	MSC-165 000001	pricing strategy document
CX	2281	MSC-165 000052	strategic corporate planning document
CX	2282	MSC-165 000055	strategic corporate planning document
CX	2283	MSC-165 000079	strategic corporate planning document
CX	2286	MSC-18 004048	technological development document
CX	2287	MSC-18 006743	Document titled "MSC.Nastran 2001 Sales Kit"
CX	2288	MSC-18 010382	technological development document
CX	2289	MSC-18 010424	Document titled "MSC's Advantages over ABC/NASTRAN companies", dated February 28, 1997
CX	2291	MSC-18 010439	strategic corporate planning document
CX	2293	MSC-18 018669	pricing strategy document
CX	2294	MSC-18 018707	pricing strategy document
CX	2295	MSC-18 018821	customer-specific strategic planning document
CX	2297	MSC-18 018976	customer-specific strategic planning document
CX	2298	MSC-18 019586	strategic corporate planning document
CX	2299	MSC-18 019832	strategic corporate planning document
CX	2300	MSC-18 021049	customer-specific strategic planning document
CX	2302	MSC-18 021053	Presentation titled Optimizing the Aerospace Design-to-Certification Process. Dated May 1998 (Dyer Ex.3)
CX	2303	MSC-18 021075	strategic corporate planning document
CX	2304	MSC-18 021084	customer-specific strategic planning document; strategic corporate planning document
CX	2305	MSC-18 021221	sales and marketing initiatives document
CX	2306	MSC-18 021227	pricing strategy document
CX	2307	MSC-18 021333	pricing strategy document
CX	2310	MSC-18 021497	Assessment entitled "Competitive Assessment of EDS/UGS/SDRC Announcement" (Blakely Ex. 36).
CX	2311	MSC-18 021619	customer-specific strategic planning document
CX	2312	MSC-18 021621	customer-specific strategic planning document
CX	2314	MSC-18 026002	sales and marketing initiatives document; customer-specific strategic planning document
CX	2315	MSC-18 026004	customer-specific strategic planning document; sales and marketing initiatives document
CX	2316	MSC-18 026337	customer-specific strategic planning document; sales and marketing initiatives document
CX	2317	MSC-18 026428	customer-specific strategic planning document
CX	2318	MSC-18 032670	Summar entitled "MSC Software Aerospace Capabilities" (Blakely Ex. 43).
CX	2319	MSC-18 032717	Notes entitled "Multi-national and Supplier Program Thoughts" authored by Hall Mattson dated May 1, 2000 (Blakely Ex. 44).

IN RE MSC SOFTWARE CORPORATION (FTC DOCKET #9299)

Attachment A to Affidavit of Frank Perna

CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	2320	MSC-18 032804	Plan entitled "Mechanical Solutions Roadmap" (Blakely Ex. 45).
CX	2322	MSC-18 032821	Document entitled "'New' MSC" (Blakely Ex. 32).
CX	2323	MSC-18 032833	Document entitled "Factual Projects" (Blakely Ex. 31).
CX	2324	MSC-18 032923	sales and marketing initiatives document; strategic corporate planning document
CX	2325	MSC-18 032930	sales and marketing initiatives document; strategic corporate planning document
CX	2328	MSC-18 18856	strategic corporate planning document
CX	2336	MSC-22 002885	strategic corporate planning document
CX	2337	MSC-22 002888	technological development document
CX	2338	MSC-22 002894	strategic corporate planning document
CX	2342	MSC-22 002987	strategic corporate planning document
CX	2343	MSC-22 003068	strategic corporate planning document
CX	2344	MSC-22 003134	strategic corporate planning document
CX	2345	MSC-22 003156	strategic corporate planning document
CX	2350	MSC-22 003715	strategic corporate planning document
CX	2355	MSC-22 004075	Letter dated 3-20-98 from Tom Curry, former CEO of MSC to Robert Thornton of Credit Suisse regarding financial analysis tables for MSC, LMS, MDI and Ansys.
CX	2358	MSC-22 004317	strategic corporate planning document
CX	2359	MSC-22 004320	strategic corporate planning document
CX	2361	MSC-22 004564	customer-specific strategic planning document
CX	2367	MSC-22 005427	strategic corporate planning document
CX	2368	MSC-22 005471	strategic corporate planning document
CX	2369	MSC-22 006768	strategic corporate planning document
CX	2370	MSC-22 006768	strategic corporate planning document
CX	2375	MSC-22 009481	Presentation entitled "Marketing" by Ken Blakely (Blakely Ex. 23).
CX	2377	MSC-25 003207	customer-specific strategic planning document
CX	2382	MSC-25 006276	strategic corporate planning document
CX	2387	MSC-33 000010	1999 Technical plan for MSC Nastran
CX	2389	MSC-38 000166	pricing strategy document; customer-specific strategic planning document
CX	2390	MSC-38 000172	customer-specific strategic planning document
CX	2391	MSC-38 000207	Letter from Joan Heil to Ann Goswitz with Subject "Re: Corporate Agreement No. 2029," dated January 4, 1994, with attached correspondence. (Barclay Ex. 15)
CX	2392	MSC-38 000362	pricing strategy document; customer-specific strategic planning document
CX	2393	MSC-38 000365	Spreadsheet titled "MSC NASTRAN Usage." (Barclay Ex. 19)
CX	2394	MSC-38 001199	pricing strategy document; customer-specific strategic planning document
CX	2395	MSC-38 001206	customer-specific strategic planning document
CX	2396	MSC-38 001209	customer-specific strategic planning document
CX	2397	MSC-38 001217	customer-specific strategic planning document
CX	2398	MSC-38 001231	customer-specific strategic planning document
CX	2399	MSC-38 001232	customer-specific strategic planning document
CX	2400	MSC-38 001775	Installation Detail Report, dated July 3, 2001, with attached Contract Amendment Form. (Barclay Ex. 17)
CX	2401	MSC-38 002093	customer-specific strategic planning document
CX	2402	MSC-38 003020	customer-specific strategic planning document
CX	2403	MSC-38 003038	customer-specific strategic planning document
CX	2404	MSC-38 003068	pricing strategy document; customer-specific strategic planning document
CX	2405	MSC-38 003151	customer-specific strategic planning document

IN RE MSC.SOFTWARE CORPORATION (FTC DOCKET #9299)

Attachment A to Affidavit of Frank Perna

CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	2406	MSC-38 003264	Email from Vic Wagner to Rick Barclay with Subject "MSC/NASTRAN integration into SIDE," dated February 10, 1999, with Email Exchange. (Barclay Ex. 30)
CX	2407	MSC-38 003510	Quotation Letter from Rick Barclay to James Still, Jr., dated December 9, 1999. (Barclay Ex. 28)
CX	2416	MSC-61 001038	pricing strategy document; strategic corporate planning document
CX	2418	MSC-61 001186	pricing strategy document; strategic corporate planning document
CX	2419	MSC-61 001219	pricing strategy document; strategic corporate planning document
CX	2424	MSC-70 001824	Handwritten Notes with calculations for years 1997-2000. (Barclay Ex. 2)
CX	2425	MSC-70 002074	customer-specific strategic planning document
CX	2426	MSC-70 002233	Handwritten Notes titled "History" with calculations for 1997-2000. (Barclay Ex. 3)
CX	2427	MSC-70 005691	customer-specific strategic planning document
CX	2428	MSC-70 005693	customer-specific strategic planning document
CX	2429	MSC-70 005702	customer-specific strategic planning document
CX	2430	MSC-70 005704	Meeting notes concerning OAO's ODIN contract, dated March 16, 1999, with attendees, Stephen Hawkins, Bobby Jefferson, Meredith Diver, Misti Shaw, and Tom Niemczura.
CX	2431	MSC-74 000002	customer-specific strategic planning document
CX	2432	MSC-74 000701	customer-specific strategic planning document
CX	2433	MSC-74 000714	customer-specific strategic planning document
CX	2435	MSC-74 001522	customer-specific strategic planning document
CX	2436	MSC-74 001550	customer-specific strategic planning document
CX	2439	MSC-74 001703	Email from Thomas Allen to Tom Cully with Subject "NASTRAN Conversion," dated March 7, 2001, with attachments. (Barthenheier Ex. 5)
CX	2440	MSC-74 001787	pricing strategy document; customer-specific strategic planning document
CX	2443	MSC-74 001985	E-mail from Greg to Tom concerning a response to "the customer's NASTRAN Capabilities List," with summary information and itemized responses attached.
CX	2446	MSC-74 005150	Fax from Joe Baldwin to Tom Cully with subject "Re: MSC Campus Token Description" dated December 10, 2001 with attached description.
CX	2447	MSC-74 005222	customer-specific strategic planning document
CX	2448	MSC-74 005373	pricing strategy document; customer-specific strategic planning document
CX	2451	MSC-74 005527	customer-specific strategic planning document
CX	2452	MSC-74 005529	customer-specific strategic planning document
CX	2456	MSC-74 005553	strategic corporate planning document
CX	2460	MSC-74 021244	E-mail from Reza Sadeghi to Americas Sales with subject "Con Call follow up, MARC vs ABAQUS presentation," dated September 7, 1999.
CX	2461	MSC-74 021896	E-mail from Paul Wright to Marinos Silveira, et al, with subject "IAR - For con call this AM; L to P Conversions," dated October 30, 2000.
CX	2462	MSC-74 021988	customer-specific strategic planning document
CX	2463	MSC-74 022139	pricing strategy document; customer-specific strategic planning document
CX	2464	MSC-74 022479	customer-specific strategic planning document
CX	2466	MSC-74 023085	pricing strategy document; sales and marketing initiatives document; strategic corporate planning document
CX	2467	MSC-74 023592	Email with subject "IAR:DDAM Specifaction Rreview for NNS", from Tom Cully to Omar Ibrahim, CC: Bart McPheeters, Dave Bremmer and Ted Rose, dated September 21, 2001

IN RE MSC.SOFTWARE CORPORATION (FTC DOCKET #9299)

Attachment A to Affidavit of Frank Perna

CX	EXHIBIT NUMBER	BATES RANGE	REASON FOR IN CAMERA TREATMENT
CX	2468	MSC-74 023794	Email with subject "Subject: Meeting at GSFC Next Week" from Tom Cully to Bart McPheeters, cc: Lance Procter, dated November 15, 1999 with email exchange attached
CX	2473	MSC-74 024458	E-mail from Tom Cully to Sam Venneri with subject "MSC.Software HQ Proposal," dated February 26, 2000.
CX	2474	MSC-74 024622	customer-specific strategic planning document
CX	2475	MSC-74 025524	Email with subject "CSA Conversion" from Don Graff to Thomas Allen, cc: Tom Cully, Ted Rose, Pr. Padmidi and Omar Ibrahim, dated March 8, 2001
CX	2479	MSC-75 000778	MSC/Nastran Minor Enhancement Form with title "Closed Hat section addition for PBARL and PBEAML," signed and approved by David Chow and Omar Ibrahim in July 2000. (Commission/Ibrahim Ex. 13)
CX	2480	MSC-75 000780	technological development document
CX	2481	MSC-75 000820	technological development document
CX	2482	MSC-75 001330	technological development document
CX	2483	MSCDS 0001	strategic corporate planning document
CX	2488	MSCDS 0060	strategic corporate planning document
CX	2489	MSCDS 0080	strategic corporate planning document
CX	2504	MSC-RED-0139	customer-specific strategic planning document
CX	2505	MSC-RED-0145	Email dated April 6, 2000 from Andrew Currie to Steve Hsieh and Ken Miyoshi with subject: "RE: Fw: Ford and GM tele-conf."
CX	2506	MSC-RED-0153	pricing strategy document; customer-specific strategic planning document
CX	2507	MSC-RED-0201	Letter from Todd Brown to Dick Radtke dated July 22, 1999.
CX	2508	MSC-RED-0229	customer-specific strategic planning document
CX	2511	no bates	pricing strategy document
CX	2519	0002376	Email regarding "Here we go again" sent from Steve Gordon on August 23, 1999.
CX	2520	MSC-75 001040	technological development document
CX	2524	MSC-04 000216	pricing strategy document; customer-specific strategic planning document
CX	2525	0002745	strategic corporate planning document
CX	2530	0004166	Memo from George Riordan to Ken Blakely regarding "Memo from GR re UAI," dated March 12, 1997.
CX	2532	0003640	Job application of Kenneth Burrell for a job at MSC dated May 13, 1991.
CX	2548	MSC-02 003829	Spreadsheet entitled "Lines of Business," with handwritten notes on the second page (at 3830).
CX	2730	MSC-02 003826	Handwritten notes entitled "Stage 1 marketing Campaign (9 weeks)," dated June 1.
CX	2735	MSC-02 003813	News release in Los Angeles, dated March 4, 1999, entitled "MSC Lauches Engineering-e.com Division," with Joanne Keates listed as the contact.
CX	2738	MSC-162 02968	Document dated September 15, 1998 entitled "MSC/FlightLoads and Dynamics Version 1 Pre-Release Information"
CX	2742	0006571	Fax regarding "Executive Staff Meeting Minutes September 16, 1996" dated October 3, 1996; at least two of the recipients were Dr. Macneal and Dr. Henke.
CX	2744	MSC-02 003789	Presentation entitled "Engineering-e.com SWAT proposal," with handwritten date of April 14, 1999.

TAB B

IN RE MSC.SOFTWARE CORPORATION (FTC DOCKET #9299)
Attachment B to Affidavit of Ken Blakely

RX	Exhibit No.	Prefix	Reason for In Camera Treatment
RX	2410	MSC-44	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2418	MSC-69	Strategic corporate planning document; Technological development Document.
RX	2463	MSC-02	Customer-specific strategic planning document; Strategic corporate planning document;
RX	2476	MSC-07	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2477	MSC-141	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2482	MSC-02	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2491	MSC-02	Strategic corporate planning document; Technological development Document.
RX	2543	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2544	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2547	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2550	MSCE	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2592	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2593	MSCE	Strategic corporate planning document;
RX	2595	MSCE	Strategic corporate planning document;
RX	2596	MSCE	Sales and marketing initiatives document; Strategic corporate planning document; Technological development Document.
RX	2602	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2607	MSCE	Customer-specific strategic planning document; Sales and marketing initiatives document; Strategic corporate planning document;
RX	2608	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2609	MSCE	Sales and marketing initiatives document; Strategic corporate planning document; Technological development Document.
RX	2610	MSCE	Sales and marketing initiatives document; Strategic corporate planning document; Technological development Document.
RX	2611	MSCE	Sales and marketing initiatives document; Strategic corporate planning document; Technological development Document.
RX	2615	MSCE	Sales and marketing initiatives document; Strategic corporate planning document; Technological development Document.
RX	2617	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2618	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2619	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2620	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2621	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2622	MSCE	Customer-specific strategic planning document;
RX	2624	MSCE	Technological development Document.
RX	2628	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2630	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2640	MSCE	Strategic corporate planning document; Technological development Document.
RX	2641	MSCE	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2656	MSCE	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2659	MSCE	Sales and marketing initiatives document; Strategic corporate planning document; Technological development Document.
RX	2664	MSCE	Sales and marketing initiatives document; Strategic corporate planning document; Technological development Document.
RX	2665	MSCE	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2666	MSCE	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2667	MSCE	Sales and marketing initiatives document; Strategic corporate planning document; Technological development Document.
RX	2668	MSCE	Sales and marketing initiatives document; Strategic corporate planning document; Technological development Document.
RX	2743	MSC-135	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2779	MSC-127	Strategic corporate planning document; Technological development Document.
RX	2828	MSC-02	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2838	MSC-08	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2839	MSC-02	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2840	MSC-08	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2841	MSC-149	Strategic corporate planning document; Technological development Document.
RX	2843	MSC-25	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2847	MSC-03	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2857	MSC-08	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2858	MSC-18	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2859	MSC-18	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2860	MSC-18	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2863	MSC-08	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2864	MSC-18	Sales and marketing initiatives document; Strategic corporate planning document;
RX	2872	MSC-03	Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	2881	MSC-02	Pricing strategy document; Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	1333	Chapter 8: Resources	Strategic corporate planning document;
RX	1336		Pricing strategy document; Customer-specific strategic planning document;
RX	1337	MDA Master Agreement Proposal and Discussion	Pricing strategy document; Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	1341		Pricing strategy document; Customer-specific strategic planning document; Sales and marketing initiatives document;
RX	1350		Pricing strategy document; Customer-specific strategic planning document; Sales and marketing initiatives document;

CERTIFICATE OF SERVICE

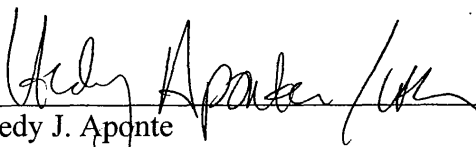
This is to certify that on June 25, 2002, I caused a copy of the MSC Software Corporation's Motion Requesting *In Camera* Treatment of Certain Highly Confidential Business Documents to be served on the following persons by hand delivery:

Honorable D. Michael Chappell
Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, DC 20580

Richard B. Dagen, Esq.
Federal Trade Commission
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