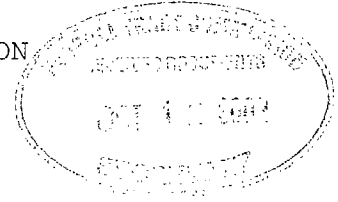


UNITED STATE OF AMERICA
BEFORE FEDERAL TRADE COMMISSION



_____)
In the Matter of)
)
CHICAGO BRIDGE & IRON COMPANY N.V.)
)
á foreign corporation,)
)
CHICAGO BRIDGE & IRON COMPANY)
)
a corporation)
)
 and)
)
PITT-DES MOINES, INC.)
)
 a corporation)
_____)

Docket No. 9300

Agreed Motion for In Camera Treatment of Pat Outtrim's
Deposition Testimony

COMES NOW, counsel for Complainant and Chicago Bridge & Iron Company, N.V., Chicago Bridge & Iron Company, and Pitt-Des Moines, Inc. parties in the above referenced cause, along counsel for the witness Pat Outtrim, president of Project Technical Liaison Associates, Inc. ("PTLA") and would show this Honorable Court as follows:

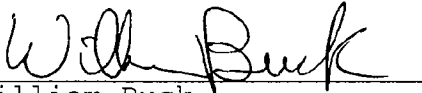
1. In light of this Court's Protective Order Governing Discovery Material, Pat Outtrim's deposition of June 4, 2002, (exhibit CX 508) was marked "RESTRICTED CONFIDENTIAL, ATTORNEY EYES ONLY." The parties intend to use portions of Ms. Outtrim's deposition testimony at trial. However, Ms. Outtrim is prevented from disclosing many items of her testimony due to the confidentiality agreements she signed as president of PTLA with several clients and potential clients.

2. Therefore, pursuant to 16 CFR Section 3.45, the parties request that the Court provide in camera treatment for the deposition transcript pages noted in Exhibit A, attached hereto and made a part hereof for all purposes. The statement of reasons for such in camera treatment also is noted in Exhibit A.

The parties pray that the Court grant this motion to allow for in camera treatment of portions of Pat Outtrim's deposition testimony, and for all other just and equitable relief as may be warranted.

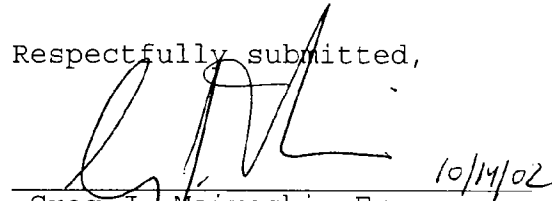
Dated: _____, 2002.

Respectfully submitted,




William Buck
Attorney at Law
4902 Yarwell
Houston, Texas 77096
(713) 721-5052
Attorney for Pat Outtrim

Respectfully submitted,



10/14/02
Greg J. Mairecki, Esq.
Winston & Strawn
35 West Wacker Drive
Chicago, IL 60601
(312) 558-7545

Respectfully submitted,



Steven L. Wilensky
Lisa A. Rosenthal
Cecelia Waldeck
Michael A. Franchak
Hector Ruiz
Commission Counsel
Federal Trade Commission
601 Pennsylvania Ave., N.W.
Washington, D.C. 20580
(202) 326-2650

ptla2.lit/100802

Exhibit A

	Reason for Confidentiality
pgs 10-12	PTL Client: "Confidentiality Agreement in Place".
pgs 14-24	PTL Client: "Confidentiality Agreement in Place".
pg 28	PTL Client: "Confidentiality Agreement in Place".
pgs 30-40	PTL Client: "Confidentiality Agreement in Place". Some Information Protected by Attorney - Client Privilege.
pg 44	PTL Client: "Confidentiality Agreement in Place".
pg 50	PTL Client: "Confidentiality Agreement in Place".
pg 52	PTL Client: "Confidentiality Agreement in Place".
pgs 54-57	PTL Client: "Confidentiality Agreement in Place".
pg 59	PTL Client: "Confidentiality Agreement in Place".
pg 60	PTL Client: "Confidentiality Agreement in Place".
pgs 64-65	PTL Client: "Confidentiality Agreement in Place".
pgs 69-70	PTL Client: "Confidentiality Agreement in Place".
pgs 72-73	PTL Client: "Confidentiality Agreement in Place".
pg 75	PTL Client: "Confidentiality Agreement in Place".
pg 78	PTL Client: "Confidentiality Agreement in Place".
pg 80	PTL Client: "Confidentiality Agreement in Place".
pg 101	Private Information of PTL. PTL is not public company.
pgs 106-119	PTL Client: "Confidentiality Agreement in Place".
pgs 128-131	PTL Client: "Confidentiality Agreement in Place".
pgs 141-148	Private Information of PTL. PTL is not public company. PTL Client: "Confidentiality Agreement in Place".
pgs 152-155	PTL Client: "Confidentiality Agreement in Place".
pgs 157-171	PTL Client: "Confidentiality Agreement in Place".
pgs 173-174	PTL Client: "Confidentiality Agreement in Place".
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UNITED STATE OF AMERICA
BEFORE FEDERAL TRADE COMMISSION

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Docket No. 9300

Agreed Order for In Camera Treatment of Portions of Pat Outtrim's
Deposition Testimony

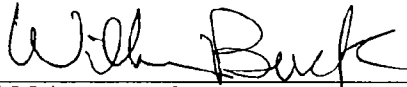
This Court has read and considered the Agreed Motion for in Camera Treatment of Pat Outtrim's Deposition Testimony, and finds that many items of her testimony should not be made public due to the confidentiality agreements she signed as president of Project Technical Liaison Associates, Inc. with several clients and potential clients.

The Court being of the opinion that said motion should be granted, it is therefore, ORDERED, ADJUDGED AND DECREED that the pages of Pat Outtrim's deposition of June 4, 2002, (exhibit CX 508) which are noted on the attached Exhibit A, shall be given in camera treatment pursuant to 16 CFR Section 3.45 by this Court and all parties.

Signed this ___ day of _____, 2002.

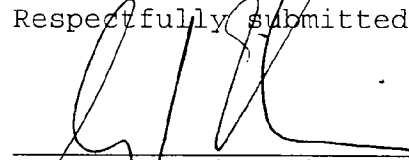
Administrative Judge Presiding

Respectfully submitted,



William Buck
Attorney at Law
4902 Yarwell
Houston, Texas 77096
(713) 721-5052
Attorney for Pat Outtrim

Respectfully submitted,



Greg J. Mairecki, Esq.
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35 West Wacker Drive
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Respectfully submitted,

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CERTIFICATE OF SERVICE

I, April Tabor, hereby certify that on the 15th day of October 2002, I served true and correct copies of this Agreed Motion for In Camera Treatment of Pat Outtrim's Deposition Testimony and of this Agreed Order for In Camera Treatment of Portions of Pat Outtrim's Deposition Testimony by hand delivery upon:

- (1) The Honorable D. Michael Chappell
Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Administrative Law Judge;

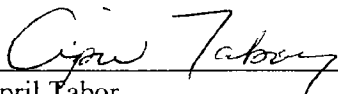
And by facsimile and U.S. mail upon:

- (2) William Buck, Esquire
4902 Yarwell
Houston, TX 77096

Counsel for Third Party Project Technical Liaison Associates, Inc.

- (3) Greg J. Miarecki
Winston & Strawn
35 West Wacker Drive
Chicago, IL 60601-9703

Counsel for respondents.



April Tabor