FEDERAL TRADE COMMISSION
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UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of **McWANE, INC.**, a corporation, and **STAR PIPE PRODUCTS, LTD.**, a limited partnership.	**PUBLIC** **Docket No. 9351**

ANSWER OF RESPONDENT STAR PIPE PRODUCTS, LTD. TO COMPLAINT OF FEDERAL TRADE COMMISSION

Pursuant to 16 C.F.R. § 3.12, Respondent Star Pipe Products, Ltd. ("Star") hereby answers the Complaint of the Federal Trade Commission ("FTC") by Paragraph as follows:

1. Paragraph 1 is a mere characterization of the Complaint to which no responsive pleading is required. To the extent that a response to this paragraph is deemed necessary, Star admits that the FTC has made such allegations as recited in Paragraph 1, but Star denies any collusive conduct by Star.

2. Star denies the factual allegations contained in Paragraph 2 related to Star. Star lacks sufficient knowledge to admit or deny the factual allegations contained in Paragraph 2 related to others.

3. Star admits the factual allegation in Paragraph 3 that the ARRA "significantly altered the competitive dynamics of the DIPF industry." Star states that the ARRA speaks for itself regarding its terms and conditions. Star denies the factual allegation in Paragraph 3 that the ARRA "upset the terms of coordination among the Sellers" including any implication that there were in fact "terms of coordination" between Star and any others.

4. Star admits the factual allegations contained in Paragraph 4.

5. Star admits the factual allegations contained in Paragraph 5 related to Star. Star lacks sufficient knowledge to admit or deny the factual allegations contained in Paragraph 5 related to others.

6. Star admits the factual allegations contained in Paragraph 6 related to Star. Star lacks sufficient knowledge to admit or deny the factual allegations contained in Paragraph 6 related to others.

7. Star denies the factual allegations contained in Paragraph 7 related to Star. Star lacks sufficient knowledge to admit or deny the factual allegations contained in Paragraph 7 related to others.

8. Star admits the factual allegations contained in the last sentence of Paragraph 8. Star lacks sufficient knowledge to admit or deny the remaining factual allegations contained in Paragraph 8.

9. Paragraph 9 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star lacks sufficient knowledge to admit or deny the factual allegations contained in Paragraph 9.

10. Paragraph 10 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star admits the factual allegations contained in Paragraph 10.

11. Star admits the factual allegations contained in Paragraph 11.

12. Paragraph 12 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star admits the factual allegations contained in Paragraph 12.

13. Paragraph 13 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star admits the factual allegations contained in Paragraph 13.

14. Star admits the factual allegations contained in Paragraph 14.

15. Star admits the factual allegations contained in Paragraph 15 as to Star. Star lacks sufficient knowledge to admit or deny the remaining allegations.

16. Star admits the factual allegations contained in Paragraph 16 as to Star. Star lacks sufficient knowledge to admit or deny the remaining allegations.

17. Star lacks sufficient knowledge to admit or deny the factual allegations contained in Paragraph 17.

18. Star admits the factual allegations contained in Paragraph 18.

19. Star admits the factual allegations contained in Paragraph 19 as generally, but not necessarily always, true.

20. Star admits the factual allegations contained in Paragraph 20 as generally, but not necessarily always, true.

21. Paragraph 21 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star lacks sufficient knowledge either to admit or deny the factual allegations contained in Paragraph 21.

22. Paragraph 22 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star lacks sufficient knowledge either to admit or deny the factual allegations contained in Paragraph 22.

23. Paragraph 23 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star lacks sufficient knowledge either to admit or deny the factual allegations contained in Paragraph 23.

24. Paragraph 24 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star lacks sufficient knowledge either to admit or deny the factual allegations in Paragraph 24.

25. Paragraph 25 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star lacks sufficient knowledge either to admit or deny the factual allegations contained in Paragraph 25.

26. Paragraph 26 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star lacks sufficient knowledge either to admit or deny the factual allegations contained in Paragraph 26.

27. Paragraph 27 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star denies the factual allegations contained in the preamble to Paragraph 27.

a. Star admits the factual allegations in the first sentence of Paragraph 27(a) as generally, but not necessarily always, true. The second sentence of Paragraph 27(a) attempts to state a legal conclusion to which no response is required. To the extent that a response to this

sentence is deemed necessary, Star denies the factual allegations contained in the second sentence of Paragraph 27(a).

b. Star lacks sufficient knowledge to admit or deny the amount of sales made by other Sellers. The remainder of Paragraph 27(b) attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star denies the remaining factual allegations contained in Paragraph 27(b).

c. Paragraph 27(c) attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star lacks sufficient knowledge to admit or deny the factual allegations contained in Paragraph 27(c).

d. Paragraph 27(d) attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star lacks sufficient knowledge to admit or deny the factual allegations contained in the first sentence of Paragraph 27(d) and admits that the factual allegations in the second sentence are generally, but not necessarily always, true.

e. Star admits that it publishes price books listing per-unit prices for most DIPF items it carries and that it sends to some customers multiplier discounts which may be used in partially determining Star's price for DIPF products to that customer. Star admits that McWane and Sigma also publish price books listing per-unit prices for most DIPF items they carry and that they send to some customers multiplier discounts. Star denies the allegations in the last sentence of Paragraph 27(e). Star lacks sufficient knowledge to admit or deny the remainder of the factual allegations in Paragraph 27(e).

28. Star denies the factual allegations in Paragraph 28 as to Star. Star lacks sufficient knowledge to admit or deny the remaining allegations in Paragraph 28.

29. Star denies the factual allegations in Paragraph 29 as to Star. Star lacks sufficient knowledge to admit or deny the remaining allegations in Paragraph 29.

30. Star admits that input costs were rising in 2008 and that it desired to increase its revenue. Star lacks sufficient knowledge to admit or deny the allegations as to the desires of other Sellers. Star denies the remainder of the factual allegations in Paragraph 30.

31. Star admits that McWane publicly announced an increase in the prices listed in McWane's price book in January 2008. Star subsequently changed the prices listed in its own price book later in January 2008. Star denies the remainder of the factual allegations in Paragraph 31.

32. Star denies the allegations concerning Star in Paragraph 32 and its subparts. Star lacks sufficient knowledge to admit or deny the remaining allegations in Paragraph 32 and its subparts.

33. Star admits that McWane publicly announced an increase in the prices listed in McWane's price book in June 2008. Star subsequently changed the prices listed in its own price book. Star denies the remainder of the factual allegations in Paragraph 33 as to Star. Star lacks sufficient knowledge to admit or deny the remaining allegations in Paragraph 33.

34. Star denies the factual allegations in the preamble of Paragraph 34 as to Star. Star lacks sufficient knowledge to admit or deny the remaining allegations in the preamble to Paragraph 34.

a. Star denies any allegations as to Star in Paragraph 34(a). Star lacks sufficient knowledge to admit or deny the remaining factual allegations contained in Paragraph 34(a).

b. Star denies any allegations as to Star in Paragraph 34(b). Star lacks sufficient knowledge to admit or deny the remaining factual allegations contained in Paragraph 34(b).

c. Star denies the allegations as to Star in Paragraph 34(c). Star lacks sufficient knowledge to admit or deny the remaining factual allegations contained in Paragraph 34(c).

d. Star admits that McWane publicly announced an increase in the prices listed in McWane's price book in June 2008. Star subsequently changed the prices listed in its own price book. Star denies the remainder of the factual allegations in Paragraph 34(d) as to Star. Star lacks sufficient knowledge to admit or deny the remaining allegations in Paragraph 34(d).

e. Star lacks sufficient knowledge to admit or deny the factual allegations contained in Paragraph 34(e).

35. Star admits that it submitted data as to tons shipped to an accounting firm with Star's shipments reported in several aggregated product categories and that DIFRA sent reports to Star showing only aggregated data. Star denies the remainder of the factual allegations in Paragraph 35.

36. Paragraph 36 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star denies the factual allegations as to Star contained in Paragraph 36. Star lacks sufficient knowledge to admit or deny the remaining factual allegations contained in Paragraph 36 as to others.

37. Paragraph 37 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star denies the factual allegations contained in Paragraph 37 as to Star. Star lacks sufficient knowledge to admit or deny the factual allegations contained in Paragraph 37 as to others.

38. Paragraph 38 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star denies the factual allegations contained in Paragraph 38 as to Star. Star lacks sufficient knowledge to admit or deny the remaining allegations in Paragraph 38.

39. Paragraph 39 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, the allegations in Paragraph 39 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

40. The allegations in Paragraph 40 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

41. Paragraph 41 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, the allegations in Paragraph 41 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

42. Paragraph 42 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, the allegations in Paragraph 42 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

43. Paragraph 43 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, the allegations in Paragraph 43 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

44. The allegations in Paragraph 44 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's and others' knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane. Star admits the allegations as to Star's having an incentive to enter the domestic DIPF market.

45. The allegations in Paragraph 45 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's and others' knowledge. Star, however, does not contest and admits in that limited sense for the limited

purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane. Star admits that it attempted to enter the domestic DIPF market in response to the ARRA.

46. Paragraph 46 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, the allegations in Paragraph 46 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

47. The allegations in Paragraph 47 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's and others' knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

48. The allegations in Paragraph 48 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

49. The allegations in Paragraph 49 and its subparts are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's and others' knowledge. Star, however, does not contest and admits in that limited sense for the

limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

50. The allegations in Paragraph 50 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's and others' knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

51. The allegations in Paragraph 51 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's and others' knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

52. The allegations in Paragraph 52 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's and others' knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

53. The allegations in Paragraph 53 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's and others' knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

54. The allegations in Paragraph 54 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's and others' knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

55. The allegations in Paragraph 55 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's and others' knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

56. The allegations in Paragraph 56 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane. Star admits the allegations in the first sentence in Paragraph 56.

57. The allegations in Paragraph 57 and its subparts are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

58. The allegations in Paragraph 58 and its subparts are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's

knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

59. The allegations in Paragraph 59 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane. Star admits the allegations as to the impact of McWane's actions on Star.

60. The allegations in Paragraph 60 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane. Star admits the allegations as to the impact of McWane's actions on Star.

61. Paragraph 61 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, the allegations in Paragraph 61 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

62. Paragraph 62 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, the allegations in Paragraph 62 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

63. Paragraph 63 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, the allegations in Paragraph 63 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

64. Paragraph 64 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star denies the factual allegations as to Star in Paragraph 64 and lacks sufficient knowledge to admit or to deny the allegations as to McWane and Sigma.

65. Paragraph 65 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star denies the factual allegations as to Star in Paragraph 65 and lacks sufficient knowledge to admit or to deny the allegations as to McWane and Sigma.

66. Paragraph 66 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, Star denies the factual allegations as to Star in Paragraph 66 and lacks sufficient knowledge to admit or to deny the allegations as to McWane and Sigma.

67. Paragraph 67 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, the allegations in Paragraph 67 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

68. Paragraph 68 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, the allegations in Paragraph 68 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

69. Paragraph 69 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, the allegations in Paragraph 69 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh

Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

70. Paragraph 70 attempts to state a legal conclusion to which no response is required. To the extent that a response to this paragraph is deemed necessary, the allegations in Paragraph 70 are directed at McWane and not at Star, and Star lacks sufficient knowledge to admit or deny factual matters solely within McWane's knowledge. Star, however, does not contest and admits in that limited sense for the limited purpose of only the Fourth, Fifth, Sixth and Seventh Violations alleged in this proceeding against only McWane those matters alleged in this paragraph against McWane.

Star denies that the Commission is entitled to any relief against Star.

Star denies any other allegations in the Complaint.

Affirmative Defenses

Star asserts the following defenses and reserves its right to raise additional defenses.

1. The Complaint, in whole or in part, fails to state a claim against Star upon which relief can be granted.

2. As to the claims against Star, the Complaint fails to comply with the requirements of Section 5(b) of the Federal Trade Commission Act, 15 U.S.C. § 45(b), because the issuance of the complaint and relief sought against Star are not in the public interest.

3. The claims against Star are barred, in whole or in part, by laches.

4. The claims against Star are barred, in whole or in part, by the First Amendment.

5. Star reserves the right to adopt any affirmative defenses set forth by Respondent McWane applicable to the First, Second and Third Violations alleged in the Complaint.

Therefore, Star demand judgment dismissing the Complaint with prejudice and awarding costs and such other relief as deemed just and proper.

Dated: January 23, 2012

Respectfully submitted,

/s/ Gregory S. C. Huffman
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Attorneys for Star Pipe Products, Ltd.

Certificate of Service and Regarding Electronic Submission

I hereby certify that on January 23, 2012, I filed the foregoing document electronically in PDF format using the FTC's E-Filing System, and thereby filed the document with:

Donald S. Clark
Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-113
Washington, DC 20580

I also certify that on January 23, 2012, I served a copy of the foregoing document on the following by first-class mail:

The Honorable D. Michael Chappell
Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-106
Washington, DC 20580

Christopher Renner
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Washington, DC 20001

Melanie Sabo
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Donald S. Clark
Secretary
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Washington, DC 20580

I also certify that the electronic PDF copy of the foregoing document sent to the Secretary of the Commission via the FTC E-Filing System is a true and correct copy of the original in my possession, which is available for review by the parties and the adjudicator.

/s/ Brian W. Stoltz
Brian W. Stoltz

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