UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of)	
)	
CHICAGO BRIDGE & IRON COMPANY N.V.)	**Corrected Public Version**
a foreign corporation,)	
)	
CHICAGO BRIDGE & IRON COMPANY)	**Docket No. 9300**
a corporation,)	
)	
PITT-DES MOINES, INC.,)	
a corporation.)	
)	

AFFIDAVIT OF RICHARD E. GOODRICH

1.   I am Executive Vice President and Chief Financial Officer of

Chicago Bridge & Iron Company N.V. ("CB&I").

2.   In 2004, CB&I [

]

3.   At the time CB&I submitted these materials to the FTC, it

designated them as highly confidential and requested that the FTC destroy or return the

materials to CB&I [   ]

4.   [

]

5.   [   ] CB&I

considers [   ] its voluntary submission of

materials to the FTC as highly confidential and extremely sensitive business information,

the release or publication of which would substantially harm CB&I's business.

6.   To CB&I's knowledge, no one outside of CB&I, aside from certain

individuals at the FTC [   ]

at the time or knows about it now.

7.   Only a small number of high level executives at CB&I were ever

privy to any information concerning [   ] This information

constitutes a highly confidential executive level strategy, and I would not casually discuss

it even within CB&I.

8.   CB&I has taken, and continues to take, all due precautions to

safeguard the confidential nature of this information.

9.   Information concerning [   ] is of great

value to CB&I because it concerns [

]

10.   CB&I expended a significant amount of effort and money pursuing

[

]

11.   Information concerning [   ] is the type of

information that cannot be duplicated outside of CB&I and which CB&I will not allow

anyone outside of its business to obtain.

12.   CB&I is particularly concerned that the release of this information

would disadvantage CB&I with respect to its competitors because it would give

competitors inside information concerning [

] In addition, CB&I voluntarily contacted the FTC and provided information to

the FTC with the understanding that its contacts and information would be held

confidential and not publicly disclosed, especially in an unrelated matter.

I declare under penalty of perjury under the laws of the United States of

America that the foregoing is true and correct.

Executed on _____

_____
Richard E. Goodrich