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

In the Matter of)
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OSF Healthcare System)
a corporation, and) Docket No. 9349
•) PUBLIC
Rockford Health System,)
a corporation.)
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)

RESPONDENTS' MOTION FOR IN CAMERA TREATMENT OF TRIAL EXHIBITS

Respondents, OSF Healthcare System ("OSF") and Rockford Health System ("RHS"), hereby submit their motion for *in camera* treatment of certain proposed trial exhibits, pursuant to 16 C.F.R. § 3.45.

In support of their motion, Respondents provide their accompanying memorandum, and Declarations of Henry Seybold (RHS) and Robert Sehring (OSF).

WHEREFORE, Respondents respectfully request that this Court grant *in camera* treatment to the documents and testimony identified in the attached tables, and described in the attached memorandum and declarations.

Dated: March 22, 2012

Respectfully submitted,

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

In the Matter of)
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OSF Healthcare System)
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RESPONDENTS' MEMORANDUM IN SUPPORT OF THEIR MOTION FOR IN CAMERA TREATMENT OF TRIAL EXHIBITS

Pursuant to Rule 3.45 of the Federal Trade Commission's Rules of Adjudicative Practice and Paragraph 7 of the Scheduling Order, Respondents OSF Healthcare System ("OSF") and Rockford Health System ("RHS"), submit this Memorandum in Support of their Motion for *In Camera* Treatment of Certain Proposed Trial Exhibits. These exhibits are identified in Tables 1 and 2 in Support of Respondents' Motion for *In Camera* Treatment, and described in the accompanying declarations of Henry M. Seybold, Jr. and Robert Sehring.

Respondents seek *in camera* treatment of these exhibits because they are confidential, competitively sensitive documents that relate to OSF's and RHS' business strategy, payor contracting, and present and future operations. Public disclosure of these documents would result in clearly defined, serious competitive injury to Respondents. For all exhibits listed in Table 1, the information contained within is 1) not known to the public generally, 2) reflects strategic decision-making of senior executives from OSF or RHS, 3) is carefully guarded by OSF or RHS to maintain secrecy, 4) would benefit competitor hospitals if disclosed, 5) is the result of significant resources expended by OSF or RHS, and 6) would be difficult for another party to

replicate. Counsel for Respondents have carefully reviewed each and every exhibit identified in Table 1 and have determined that the exhibits meet the standards for *in camera* treatment, as set forth in Rule 3.45 and in Paragraph 7 of the Scheduling Order.

I. The Clearly Defined, Serious Injury Standard

An applicant may receive in camera treatment of material offered into evidence when "its public disclosure will likely result in a clearly defined, serious injury." 16 C.F.R. § 3.45(b). In other words, "requests for in camera treatment must show 'that the public disclosure of the documentary evidence will result in a clearly defined, serious injury to the person or corporation whose records are involved." In re Kaiser Aluminum & Chem. Corp., 103 F.T.C. 500, at *1 (May 25, 1984) (citation omitted). An applicant can meet that standard by establishing that the evidence is "sufficiently secret and sufficiently material to the applicant's business that disclosure would result in serious competitive injury." See In the Matter of Evanston Northwestern Healthcare Corp., 2005 F.T.C. LEXIS 27, at *1 (Feb. 9, 2005) (citation omitted). Further, the Commission has recognized that it is appropriate to grant in camera treatment for business records. In re Champion Spark Plug Co., 1982 FTC LEXIS 85, at *2 (April 5, 1982). When determining whether to grant motions for in camera treatment, administrative courts review six factors to determine secrecy and materiality of the exhibits at issue: (1) the extent to which the information is known outside of the applicant's business; (2) the extent to which it is known by employees and others involved in his business; (3) the extent of 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. See In the Matter of Bristol-Myers Co., 90 F.T.C. 455, at *5-6 (Nov. 11, 1997).

II. Respondents' Documents Meet the Clearly Defined, Serious Injury Standard

All six factors support granting Respondents' motion for *in camera* treatment. First, Respondents treat as confidential every document for which they seek *in camera* treatment. The information in these materials is not known to the public or generally outside OSF or RHS (or the party with whom the entities are negotiating or contracting). (See Sehring Decl. ¶ 4; Seybold Decl. ¶ 4.) These documents are not a matter of public record and have not been fully disclosed in any public context.

Second, the documents reflect the strategic decision-making of OSF and RHS senior executives. The information contained in the documents or discussed during the depositions is not generally disseminated throughout OSF or RHS. (See Sehring Decl. ¶ 4; Seybold Decl. ¶ 4.)

Third, OSF and RHS have carefully guarded the secrecy of their materials. The entities were compelled to produce the materials pursuant to the discovery process, but otherwise they have not publically disclosed the information found within the confidential documents or discussed during the depositions. (See Sehring Decl. ¶ 4; Seybold Decl. ¶ 4.)

Fourth, competitor hospitals, such as SwedishAmerican, would benefit significantly from gaining access to these materials. The materials reflect OSF's and RHS' business strategies, finances and financial plans, budgeting scenarios, clinical quality reports, competitive goals, and contracting initiatives, all of which are competitively sensitive. For example, the materials include correspondence revealing negotiations with non-party managed care organizations ("MCOs"). These materials are competitively sensitive to OSF and RHS, as well as to the non-parties with which they contract. These documents represent a complex process and are unique to the relevant parties. Hospital competitors and other MCOs would benefit significantly and unfairly from gaining access to these materials.

Fifth, OSF and RHS have spent significant money in developing some of the materials, particularly financial budgets, strategic plans, and presentations created by third-party consultants. (See Sehring Decl. ¶ 4; Seybold Decl. ¶ 4.) Respondents have hired consultants to assist them by analyzing their operations, financial performance, and potential strategies for future affiliations. Respondents have also hired experts to assist them with their defense in this matter. The public disclosure of this information would harm OSF's and RHS' business operations, their defense of this case, and, in the case of expert reports and related exhibits, reveal confidential non-party information.

Finally, it would be difficult for another party to replicate the information found in these materials because they reflect the work product of senior executives with years of experience in these organizations. The materials are unique and tailored to the respective entities and not known to the general public.

The tribunal may infer, "without a specific showing of how a competitor would use it, that disclosure of allegedly sensitive information would seriously affect the firm's commercial position. Underlying this analysis is a general concern for the seriousness of injury to a firm's commercial or competitive position." *In the Matter of E.I. Dupont de Nemours & Co.*, 97 F.T.C. 116, at *3 (Jan. 21, 1981). The materials at issue here pose a strong likelihood of harming the competitive position of Respondents, and certain non-party MCOs if disclosed to the public.

The information for which Respondents seek *in camera* treatment remains relevant and significant today. Respondents limit the documents for which they seek *in camera* treatment to those that are no older than four years. Nevertheless, even aged data is sensitive and remains worthy of protection because they reflect OSF and RHS business strategies, and can impact future negotiations between Respondents and MCOs. Disclosure of these materials would cause

competitive harm to Respondents and to non-party MCOs in future contract negotiations. See in re Kaiser Aluminum & Chemical Corp., 103 F.T.C. 500, at *2 (May 25, 1984) (holding that material that was over five years old was still sensitive and deserving of in camera treatment where "a serious injury would be done by release of this information, which they have never made available to the public").

III. Expiration Date

Respondents seek in camera treatment for a period of three years for the exhibits identified in Table I and testimony identified in Table 2. Where in camera treatment is granted for business records, it is typically extended for two to five years. See Evanston Northwestern Healthcare Corp., 2005 F.T.C. LEXIS 27, at *2 (Feb. 9, 2005); In re Union Oil Co. of Cal, 2004 FTC LEXIS 223, at *2 (Nov. 22, 2004); In the Matter of E.I. Dupont de Nemours & Co., 97 F.T.C. LEXIS 116, 118 (Jan. 21, 1981) (granting financial data in camera treatment for three years); In re Int'l Ass. Of Conf. Interpreters, 1996 F.T.C. LEXIS 298 (June 26, 1996) (granting contracts in camera treatment for three years). Three years is necessary to protect Respondents' agreements with commercial health plans because those contracts often last several years. Three years is also necessary to protect business records with competitively sensitive information that contain projections or forecasts impacting future plans and initiatives. Therefore, documents that are three to five years old remain relevant, material, and confidential, and warrant in camera treatment.

IV. Conclusion

Pursuant to 16 C.F.R. §3.45 and Paragraph 7 of the Scheduling Order, Respondents respectfully move for *in camera* treatment of the proposed exhibits listed in Table 1, and the designated testimony identified in Table 2.

Dated: March 22, 2012

Respectfully submitted,

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Attorneys for Respondent Rockford Health System

MEET AND CONFER STATEMENT

On March 19, 2012, Nicole Castle, counsel for Respondent, Rockford Health System, conferred telephonically with Kenneth Field, Complaint Counsel, regarding Respondents' Motion for *In Camera* Treatment of Proposed Trial Exhibits. On March 20, 2012, Ms. Castle emailed Mr. Field regarding Respondents' Motion for *In Camera* Treatment of Proposed Trial Exhibits. As of 3pm EST on March 20, 2012, Complaint Counsel had not agreed to the relief sought in Respondents' motion.

Dated: March 22, 2012

Respectfully submitted,

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Attorneys for Respondent Rockford Health System

CERTIFICATE OF SERVICE

I, Nicole L. Castle, hereby certify that on this 22nd day of March, 2012, a true and correct copy of the foregoing Public Version of Respondents' Motion for *In Camera* Treatment was served upon the following individuals by hand:

Hon. D. Michael Chappell Chief Administrative Law Judge Federal Trade Commission 600 Pennsylvania Avenue, NW Room H110 Washington, DC 20580 Donald S. Clark
Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW
Room 172
Washington, DC 20580

I, Nicole L. Castle, hereby certify that on this 22nd day of March, 2012, a true and correct copy of the foregoing Public Version of Respondents' Motion for *In Camera* Treatment was served on the following counsel via electronic mail:

Matthew J. Reilly Matthew J. Reilly Jeffrey H. Perry Kenneth W. Field Richard Cunningham, Esq. Jeremy P. Morrison Katherine A. Ambrogi Andrea Zach Jeanne Liu Stephanie Reynolds Theresa Lau Federal Trade Commission 600 Pennsylvania Ave., N.W. Washington, D.C. 20580 mreilly@ftc.gov iperry@ftc.gov kfield@ftc.gov rcunningham@ftc.gov imorrison@ftc.gov kambrogi@ftc.gov azach@ftc.gov iliu@ftc.gov sreynolds@ftc.gov tlau@ftc.gov

Dated: March 22, 2012

Attorney for Rockford Health System

UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of)
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OSF Healthcare System)
a corporation, and) Docket No. 9349
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Rockford Health System,)
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[PROPOSED] ORDER GRANTING RESPONDENTS' MOTION FOR IN CAMERA TREATMENT OF TRIAL EXHIBITS

Upon consideration of Respondents Motion for *In Camera* Treatment of Trial Exhibits, it is hereby ordered that *in camera* treatment will be given to the exhibits listed in the Table below for the period of time indicated.

Dated: March , 2012

The Honorable D. Michael Chappell Chief Administrative Law Judge

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		i. ihandan	Tanifale stenaiteit
DX0003	N/A	Three years	March 20, 2015
DX0004	N/A	Three years	March 20, 2015
DX0005	PX2263	Three years	March 20, 2015
DX0006	N/A	Three years	March 20, 2015
DX0007	N/A	Three years	March 20, 2015
DX0011	PX2261	Three years	March 20, 2015
DX0012	PX2262	Three years	March 20, 2015
DX0022	N/A	Three years	March 20, 2015
DX0026	N/A	Three years	March 20, 2015
DX0027	N/A	Three years	March 20, 2015

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DX0028	N/A	Three years	March 20, 2015
DX0032	N/A	Three years	March 20, 2015
DX0033	N/A	Three years	March 20, 2015
DX0034	N/A	Three years	March 20, 2015
DX0035	N/A	Three years	March 20, 2015
DX0036	N/A	Three years	March 20, 2015
DX0038	N/A	Three years	March 20, 2015
DX0039	N/A	Three years	March 20, 2015
DX0040	N/A	Three years	March 20, 2015
DX0041	PX1153	Three years	March 20, 2015
DX0042	PX0006	Three years	March 20, 2015
DX0045	PX0342	Three years	March 20, 2015
DX0046	N/A	Three years	March 20, 2015
DX0047	N/A	Three years	March 20, 2015
DX0048	N/A	Three years	March 20, 2015
DX0049	PX0001	Three years	March 20, 2015
DX0050	N/A	Three years	March 20, 2015
DX0052	N/A	Three years	March 20, 2015
DX0053	N/A	Three years	March 20, 2015
DX0055	N/A	Three years	March 20, 2015
DX0056	N/A	Three years	March 20, 2015
DX0057	PX0642	Three years	March 20, 2015
DX0058	N/A	Three years	March 20, 2015
DX0059	N/A	Three years	March 20, 2015
DX0060	N/A	Three years	March 20, 2015
DX0061	N/A	Three years	March 20, 2015
DX0062	N/A	Three years	March 20, 2015
DX0063	PX0592	Three years	March 20, 2015
DX0064	PX0004	Three years	March 20, 2015
DX0065	N/A	Three years	March 20, 2015
DX0066	N/A	Three years	March 20, 2015
DX0068	N/A	Three years	March 20, 2015
DX0069	N/A	Three years	March 20, 2015
DX0071	N/A	Three years	March 20, 2015
DX0072	N/A	Three years	March 20, 2015
DX0074	N/A	Three years	March 20, 2015
DX0079	N/A	Three years	March 20, 2015
DX0080	N/A	Three years	March 20, 2015
DX0081	N/A	Three years	March 20, 2015
DX0082	N/A	Three years	March 20, 2015
DX0083	N/A	Three years	March 20, 2015
DX0086	N/A	Three years	March 20, 2015
DX0095	PX0175	Three years	March 20, 2015

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DX0097	N/A	Three years	March 20, 2015
DX0098	N/A	Three years	March 20, 2015
DX0099	N/A	Three years	March 20, 2015
DX0100	N/A	Three years	March 20, 2015
DX0101	N/A	Three years	March 20, 2015
DX0102	N/A	Three years	March 20, 2015
DX0103	N/A	Three years	March 20, 2015
DX0104	N/A	Three years	March 20, 2015
DX0105	N/A	Three years	March 20, 2015
DX0106	N/A	Three years	March 20, 2015
DX0111	N/A	Three years	March 20, 2015
DX0112	N/A	Three years	March 20, 2015
DX0113	N/A	Three years	March 20, 2015
DX0114	N/A	Three years	March 20, 2015
DX0115	N/A	Three years	March 20, 2015
DX0116	N/A	Three years	March 20, 2015
DX0117	N/A	Three years	March 20, 2015
DX0119	N/A	Three years	March 20, 2015
DX0121	N/A	Three years	March 20, 2015
DX0122	N/A	Three years	March 20, 2015
DX0123	N/A	Three years	March 20, 2015
DX0124	N/A	Three years	March 20, 2015
DX0125	N/A	Three years	March 20, 2015
DX0126	N/A	Three years	March 20, 2015
DX0127	N/A	Three years	March 20, 2015
DX0128	N/A	Three years	March 20, 2015
DX0130	N/A	Three years	March 20, 2015
DX0131	N/A	Three years	March 20, 2015
DX0137	N/A	Three years	March 20, 2015
DX0139	N/A	Three years	March 20, 2015
DX0140	N/A	Three years	March 20, 2015
DX0141	N/A	Three years	March 20, 2015
DX0142	N/A	Three years	March 20, 2015
DX0143	N/A	Three years	March 20, 2015
DX0145	N/A	Three years	March 20, 2015
DX0146	N/A	Three years	March 20, 2015
DX0147	N/A	Three years	March 20, 2015
DX0150	PX3636	Three years	March 20, 2015
DX0151	N/A	Three years	March 20, 2015
DX0154	N/A	Three years	March 20, 2015
DX0156	N/A	Three years	March 20, 2015
DX0158	PX3641	Three years	March 20, 2015
DX0159	PX0659	Three years	March 20, 2015

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DX0160	N/A	Three years	March 20, 2015
DX0161	N/A	Three years	March 20, 2015
DX0163	N/A	Three years	March 20, 2015
DX0165	N/A	Three years	March 20, 2015
DX0166	N/A	Three years	March 20, 2015
DX0167	N/A	Three years	March 20, 2015
DX0168	PX0043	Three years	March 20, 2015
DX0169	N/A	Three years	March 20, 2015
DX0170	N/A	Three years	March 20, 2015
DX0172	N/A	Three years	March 20, 2015
DX0173	N/A	Three years	March 20, 2015
DX0175	N/A	Three years	March 20, 2015
DX0179	PX3578	Three years	March 20, 2015
DX0183	PX0215	Three years	March 20, 2015
DX0184	PX0226	Three years	March 20, 2015
DX0185	PX0224	Three years	March 20, 2015
DX0186	PX0220	Three years	March 20, 2015
DX0187	PX0219	Three years	March 20, 2015
DX0189	PX0221	Three years	March 20, 2015
DX0190	PX0225	Three years	March 20, 2015
DX0191	PX0218	Three years	March 20, 2015
DX0193	PX0227	Three years	March 20, 2015
DX0194	PX0211	Three years	March 20, 2015
DX0195	PX0229	Three years	March 20, 2015
DX0196	PX0223	Three years	March 20, 2015
DX0197	PX0213	Three years	March 20, 2015
DX0199	N/A	Three years	March 20, 2015
DX0276	N/A	Three years	March 20, 2015
DX0277	N/A	Three years	March 20, 2015
DX0300	N/A	Three years	March 20, 2015
DX0306	N/A	Three years	March 20, 2015
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DX0317	N/A	Three years	March 20, 2015
DX0318	N/A	Three years	March 20, 2015
DX0325	N/A	Three years	March 20, 2015
DX0327	N/A	Three years	March 20, 2015
DX0332	N/A	Three years	March 20, 2015
DX0335	N/A	Three years	March 20, 2015
DX0338	N/A	Three years	March 20, 2015
DX0339	N/A	Three years	March 20, 2015

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DX0340	N/A	Three years	(<i>carreo, a</i> 157, 200 and 6 March 20, 2015
DX0340	N/A N/A	Three years	March 20, 2015
DX0341 DX0342	N/A N/A	Three years	March 20, 2015
		Three years	
DX0345	N/A	Three years	March 20, 2015
DX0347	N/A	Three years	March 20, 2015
DX0349	N/A	Three years	March 20, 2015
DX0352	N/A	Three years	March 20, 2015
DX0353	N/A	Three years	March 20, 2015
DX0356	N/A	Three years	March 20, 2015
DX0364	PX2269	Three years	March 20, 2015
DX0365	N/A	Three years	March 20, 2015
DX0366	PX2268	Three years	March 20, 2015
DX0373	N/A	Three years	March 20, 2015
DX0394	PX0222	Three years	March 20, 2015
DX0395	PX0167	Three years	March 20, 2015
DX0552			
DX0397	N/A	Three years	March 20, 2015
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DX0435	N/A	Three years	March 20, 2015
DX0443	N/A	Three years	March 20, 2015
DX0452	N/A	Three years	March 20, 2015
DX0484	PX0166	Three years	March 20, 2015
DX0553			
DX0485	PX0377	Three years	March 20, 2015
DX0554			
DX0500	N/A	Three years	March 20, 2015
DX0509	N/A	Three years	March 20, 2015
DX0513	N/A	Three years	March 20, 2015
DX0530	N/A	Three years	March 20, 2015
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DX0540	N/A	Three years	March 20, 2015
DX0541	N/A	Three years	March 20, 2015
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DX0544A	N/A	Three years	March 20, 2015
DX0545	N/A	Three years	March 20, 2015
DX0546	N/A	Three years	March 20, 2015
DX0547	N/A	Three years	March 20, 2015
DX0548	N/A	Three years	March 20, 2015
DX0549	PX3033	Three years	March 20, 2015
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DX0555	N/A	Three years	March 20, 2015
DX0561	PX0343	Three years	March 20, 2015
DX0562	PX0475	Three years	March 20, 2015
DX0563	N/A	Three years	March 20, 2015
DX0564	N/A	Three years	March 20, 2015
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DX0566	N/A	Three years	March 20, 2015
DX0567	N/A	Three years	March 20, 2015
DX0568	PX3006	Three years	March 20, 2015
DX0569	PX3005	Three years	March 20, 2015
DX0570	PX1029	Three years	March 20, 2015
	PX1030		
DX0572	PX0452	Three years	March 20, 2015
DX0603	PX0715	Three years	March 20, 2015
DX0604	PX0180	Three years	March 20, 2015
DX0605	PX0094	Three years	March 20, 2015
DX0607	PX0002	Three years	March 20, 2015
DX0921	PX0009		
DX0608	PX0007	Three years	March 20, 2015
	PX0045		
DX0609	PX0006	Three years	March 20, 2015
DX0613	PX0005	Three years	March 20, 2015
	PX0493		
DX0614	PX0348	Three years	March 20, 2015
DX0616		Three years	March 20, 2015
DX0652	N/A	Three years	March 20, 2015
DX0654	N/A	Three years	March 20, 2015
DX0656	N/A	Three years	March 20, 2015
DX0667	N/A	Three years	March 20, 2015
DX0668	N/A	Three years	March 20, 2015
DX0669	N/A	Three years	March 20, 2015
DX0670	N/A	Three years	March 20, 2015
DX0675	N/A	Three years	March 20, 2015
DX0676	N/A	Three years	March 20, 2015
DX0679	N/A	Three years	March 20, 2015
DX0680	N/A	Three years	March 20, 2015
DX0681	N/A	Three years	March 20, 2015
DX0682	N/A	Three years	March 20, 2015
DX0683	N/A	Three years	March 20, 2015
DX0684	N/A	Three years	March 20, 2015
DX0685	N/A	Three years	March 20, 2015
DX0688	N/A	Three years	March 20, 2015

		ិនិសា ច្ រីសែទិក Comstac	is in final to
	Pos Smithae	및 :::() (4.) 되어 가득하는 것 않는 소문이는 경험을 하는 것 같다. 이 사람이 있다.	Compression (Since
DX0697	PX0371	Three years	March 20, 2015
	PX3136		
DX0698	PX0216	Three years	March 20, 2015
DX0700	PX4045	Three years	March 20, 2015
DX0706	PX4025	Three years	March 20, 2015
DX0708	PX4040	Three years	March 20, 2015
DX0709	PX4023	Three years	March 20, 2015
DX0710	PX4046	Three years	March 20, 2015
DX0714	PX4020	Three years	March 20, 2015
DX0715	PX4024	Three years	March 20, 2015
DX0716	PX0421	Three years	March 20, 2015
DX0721	N/A	Three years	March 20, 2015
DX0722	N/A	Three years	March 20, 2015
DX0724	N/A	Three years	March 20, 2015
DX0725	N/A	Three years	March 20, 2015
DX0726	N/A	Three years	March 20, 2015
DX0727	N/A	Three years	March 20, 2015
DX0728	N/A	Three years	March 20, 2015
DX0729	N/A	Three years	March 20, 2015
DX0731	N/A	Three years	March 20, 2015
DX0732	N/A	Three years	March 20, 2015
DX0733	N/A	Three years	March 20, 2015
DX0734	N/A	Three years	March 20, 2015
DX0767	N/A	Three years	March 20, 2015
DX0770	N/A	Three years	March 20, 2015
DX0771	N/A	Three years	March 20, 2015
DX0772	N/A	Three years	March 20, 2015
DX0774	N/A	Three years	March 20, 2015
DX0775	N/A	Three years	March 20, 2015
DX0778	N/A	Three years	March 20, 2015
DX0779	N/A	Three years	March 20, 2015
DX0780	N/A	Three years	March 20, 2015
DX0781	N/A	Three years	March 20, 2015
DX0782	N/A	Three years	March 20, 2015
DX0783	N/A	Three years	March 20, 2015
DX0784	N/A	Three years	March 20, 2015
DX0785	N/A	Three years	March 20, 2015
DX0787	N/A	Three years	March 20, 2015
DX0788	N/A	Three years	March 20, 2015
DX0789	N/A	Three years	March 20, 2015
DX0790	N/A	Three years	March 20, 2015
DX0791	N/A	Three years	March 20, 2015
DX0792	N/A	Three years	March 20, 2015

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DX0795	N/A	Three years	March 20, 2015
DX0796	N/A	Three years	March 20, 2015
DX0797	N/A	Three years	March 20, 2015
DX0798	N/A	Three years	March 20, 2015
DX0800	N/A	Three years	March 20, 2015
DX0802	N/A	Three years	March 20, 2015
DX0803	N/A	Three years	March 20, 2015
DX0804	N/A	Three years	March 20, 2015
DX0805	N/A	Three years	March 20, 2015
DX0806	N/A	Three years	March 20, 2015
DX0809	N/A	Three years	March 20, 2015
DX0811	N/A	Three years	March 20, 2015
DX0814	N/A	Three years	March 20, 2015
DX0815	PX3139	Three years	March 20, 2015
DX0816	N/A	Three years	March 20, 2015
DX0817	N/A	Three years	March 20, 2015
DX0818	N/A	Three years	March 20, 2015
DX0821	N/A	Three years	March 20, 2015
DX0822	N/A	Three years	March 20, 2015
DX0823	N/A	Three years	March 20, 2015
DX0824	N/A	Three years	March 20, 2015
DX0826	N/A	Three years	March 20, 2015
DX0828	N/A	Three years	March 20, 2015
DX0829	N/A	Three years	March 20, 2015
DX0830	N/A	Three years	March 20, 2015
DX0831	N/A	Three years	March 20, 2015
DX0834	N/A	Three years	March 20, 2015
DX0837	N/A	Three years	March 20, 2015
DX0838	N/A	Three years	March 20, 2015
DX0839	N/A	Three years	March 20, 2015
DX0841	N/A	Three years	March 20, 2015
DX0842	N/A	Three years	March 20, 2015
DX0845	N/A	Three years	March 20, 2015
DX0846	N/A	Three years	March 20, 2015
DX0847	N/A	Three years	March 20, 2015
DX0849	N/A	Three years	March 20, 2015
DX0851	N/A	Three years	March 20, 2015
DX0855	N/A	Three years	March 20, 2015
DX0859	N/A	Three years	March 20, 2015
DX0865	N/A	Three years	March 20, 2015
DX0866	N/A	Three years	March 20, 2015
DX0875	N/A	Three years	March 20, 2015
DX0876	N/A	Three years	March 20, 2015

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DX0877	N/A	Three years	March 20, 2015
DX0878	N/A	Three years	March 20, 2015
DX0880	N/A	Three years	March 20, 2015
DX0881	N/A	Three years	March 20, 2015
DX0900	N/A	Three years	March 20, 2015
DX0901	N/A	Three years	March 20, 2015
DX0903	N/A	Three years	March 20, 2015
DX0913	N/A	Three years	March 20, 2015
DX0914	PX4541	Three years	March 20, 2015
DX0916	N/A	Three years	March 20, 2015
DX0917	N/A	Three years	March 20, 2015
DX0918	N/A	Three years	March 20, 2015
DX0923	PX0334	Three years	March 20, 2015
DX0925	PX0190	Three years	March 20, 2015
DX0926	PX0183	Three years	March 20, 2015
DX0927	PX0184	Three years	March 20, 2015
DX0928	PX0187	Three years	March 20, 2015
DX0929	PX2000	Three years	March 20, 2015
DX0930	PX2001	Three years	March 20, 2015
DX0932	PX0453	Three years	March 20, 2015
DX0934	PX3046	Three years	March 20, 2015
DX0937	PX4022	Three years	March 20, 2015
DX1095	PX0901	Three years	March 20, 2015
DX1096	N/A	Three years	March 20, 2015
DX1097	N/A	Three years	March 20, 2015
DX1098	N/A	Three years	March 20, 2015
DX1099	N/A	Three years	March 20, 2015
DX1100	N/A	Three years	March 20, 2015
DX1101	N/A	Three years	March 20, 2015
DX1102	N/A	Three years	March 20, 2015
DX1103	N/A	Three years	March 20, 2015
DX1104	N/A	Three years	March 20, 2015
DX1105	N/A	Three years	March 20, 2015
DX1106	N/A	Three years	March 20, 2015
DX1107	N/A	Three years	March 20, 2015
DX1108	N/A	Three years	March 20, 2015
DX1109	N/A	Three years	March 20, 2015
DX1110	N/A	Three years	March 20, 2015
DX1113	N/A	Three years	March 20, 2015
DX1114	N/A	Three years	March 20, 2015
DX1115	N/A	Three years	March 20, 2015
DX1148	PX4076	Three years	March 20, 2015
DX1158	PX4073	Three years	March 20, 2015

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DX Similar (- 13% Yoming	i de la company de la comp La company de la company d	្សាស្ត្រាស់ មាន ប្រជាជាក្រុម ខេត្ត ប្រជាជាក្រុម ខេត្ត ប្រជាជាក្រុម ខេត្ត ប្រជាជាក្រុម ខេត្ត ប្រជាជាក្រុម ខេត្ត
DX1163	PX4074	Three years	March 20, 2015
DX1178	PX4075	Three years	March 20, 2015
DX1180	PX4071	Three years	March 20, 2015
DX1182	PX4057	Three years	March 20, 2015
DX1184	PX4061	Three years	March 20, 2015
DX1185	PX4058	Three years	March 20, 2015
DX1187	PX4079	Three years	March 20, 2015
DX1209	N/A	Three years	March 20, 2015
DX1210	N/A	Three years	March 20, 2015
DX1211	N/A	Three years	March 20, 2015
DX1213	N/A	Three years	March 20, 2015
DX1214	N/A	Three years	March 20, 2015
DX1278	N/A	Three years	March 20, 2015
DX1279	PX0311	Three years	March 20, 2015
DX1282	PX3168	Three years	March 20, 2015
DX1283	PX3167	Three years	March 20, 2015
DX1289	PX3202	Three years	March 20, 2015
DX1290	PX3204	Three years	March 20, 2015
DX1291	PX3176	Three years	March 20, 2015
DX1292	PX4773	Three years	March 20, 2015
DX1299	N/A	Three years	March 20, 2015
DX1300	N/A	Three years	March 20, 2015
DX1301	N/A	Three years	March 20, 2015
DX1302	N/A	Three years	March 20, 2015
DX1303	N/A	Three years	March 20, 2015
DX1324	N/A	Three years	March 20, 2015
DX1326	N/A	Three years	March 20, 2015
DX1327	N/A	Three years	March 20, 2015
DX1328	N/A	Three years	March 20, 2015
DX1329	N/A	Three years	March 20, 2015
DX1355	N/A	Three years	March 20, 2015
DX1362			
DX1424	N/A	Three years	March 20, 2015
DX1426	N/A	Three years	March 20, 2015
N/A	PX0001	Three years	March 20, 2015
N/A	PX0003	Three years	March 20, 2015
	PX0495		
N/A	PX0034	Three years	March 20, 2015
N/A	PX0036	Three years	March 20, 2015
N/A	PX0037	Three years	March 20, 2015
N/A	PX0039	Three years	March 20, 2015
N/A	PX0040	Three years	March 20, 2015
N/A	PX0041	Three years	March 20, 2015

ประจากกัน	412050006	이 점을 가게 되었다면서 사람들이 가장하게 하는 것이다. 그 나는 사람들은 사람들이 되었다는 것이 없는 것이다.	Dogerie Larin (1979)
N/A	PX0042	Three years	<i>Compares</i> March 20, 2015
N/A	PX0043	Three years	March 20, 2015
N/A	PX0043	Three years	March 20, 2015
N/A	PX0045	Three years	March 20, 2015
N/A	PX0046	Three years	March 20, 2015
N/A N/A	PX0047		March 20, 2015
N/A N/A	PX0047 PX0058	Three years	
N/A N/A		Three years	March 20, 2015
	PX0059	Three years	March 20, 2015
N/A	PX0060	Three years	March 20, 2015
N/A	PX0061	Three years	March 20, 2015
N/A	PX0062	Three years	March 20, 2015
N/A	PX0063	Three years	March 20, 2015
N/A	PX0064	Three years	March 20, 2015
N/A	PX0074	Three years	March 20, 2015
N/A	PX0075	Three years	March 20, 2015
N/A	PX0076	Three years	March 20, 2015
N/A	PX0093	Three years	March 20, 2015
N/A	PX0095	Three years	March 20, 2015
N/A	PX0096	Three years	March 20, 2015
N/A	PX0097	Three years	March 20, 2015
N/A	PX0098	Three years	March 20, 2015
N/A	PX0099	Three years	March 20, 2015
N/A	PX0103	Three years	March 20, 2015
N/A	PX0121	Three years	March 20, 2015
N/A	PX0123	Three years	March 20, 2015
N/A	PX0124	Three years	March 20, 2015
N/A	PX0131	Three years	March 20, 2015
N/A	PX0133	Three years	March 20, 2015
N/A	PX0165	Three years	March 20, 2015
N/A	PX0170	Three years	March 20, 2015
N/A	PX0172	Three years	March 20, 2015
N/A	PX0173	Three years	March 20, 2015
N/A	PX0174	Three years	March 20, 2015
N/A	PX0175	Three years	March 20, 2015
N/A	PX0177	Three years	March 20, 2015
N/A	PX0185	Three years	March 20, 2015
N/A	PX0189	Three years	March 20, 2015
N/A	PX0203	Three years	March 20, 2015
N/A	PX0204	Three years	March 20, 2015
N/A	PX0210	Three years	March 20, 2015
N/A	PX0210		March 20, 2015
N/A		Three years	
	PX0228	Three years	March 20, 2015
N/A	PX0250	Three years	March 20, 2015

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· / in	D. Managa		isantar ilasimin. Isantar ilasimin
N/A	PX0301	Three years	March 20, 2015
N/A	PX0307	Three years	March 20, 2015
N/A	PX0308	Three years	March 20, 2015
N/A	PX0310	Three years	March 20, 2015
N/A	PX0312	Three years	March 20, 2015
N/A	PX0313	Three years	March 20, 2015
N/A	PX0314	Three years	March 20, 2015
N/A	PX0318	Three years	March 20, 2015
N/A	PX0321	Three years	March 20, 2015
N/A	PX0322	Three years	March 20, 2015
N/A	PX0323	Three years	March 20, 2015
N/A	PX0324	Three years	March 20, 2015
N/A	PX0327	Three years	March 20, 2015
N/A	PX0329	Three years	March 20, 2015
	PX3184		. ,
N/A	PX0332	Three years	March 20, 2015
N/A	PX0333	Three years	March 20, 2015
N/A	PX0335	Three years	March 20, 2015
N/A	PX0336	Three years	March 20, 2015
N/A	PX0338	Three years	March 20, 2015
N/A	PX0341	Three years	March 20, 2015
N/A	PX0345	Three years	March 20, 2015
N/A	PX0351	Three years	March 20, 2015
N/A	PX0355	Three years	March 20, 2015
N/A	PX0357	Three years	March 20, 2015
N/A	PX0358	Three years	March 20, 2015
N/A	PX0360	Three years	March 20, 2015
N/A	PX0361	Three years	March 20, 2015
N/A	PX0362	Three years	March 20, 2015
N/A	PX0373	Three years	March 20, 2015
N/A	PX0375	Three years	March 20, 2015
N/A	PX0378	Three years	March 20, 2015
N/A	PX0385	Three years	March 20, 2015
N/A	PX0386	Three years	March 20, 2015
N/A	PX0388	Three years	March 20, 2015
	PX3012		·
N/A	PX0389	Three years	March 20, 2015
•	PX3015		
N/A	PX0436	Three years	March 20, 2015
N/A	PX0438	Three years	March 20, 2015
N/A	PX0443	Three years	March 20, 2015
N/A	PX0445	Three years	March 20, 2015
N/A	PX0446	Three years	March 20, 2015

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N/A	PX0447	Three years	March 20, 2015
N/A N/A	PX0447	Three years	March 20, 2015
N/A N/A	PX0449		March 20, 2015
N/A N/A		Three years	
	PX0451	Three years	March 20, 2015
N/A	PX0458	Three years	March 20, 2015
N/A	PX0460	Three years	March 20, 2015
N/A	PX0461	Three years	March 20, 2015
N/A	PX0465	Three years	March 20, 2015
N/A	PX0466	Three years	March 20, 2015
N/A	PX0468	Three years	March 20, 2015
N/A	PX0470	Three years	March 20, 2015
N/A	PX0471	Three years	March 20, 2015
N/A	PX0484	Three years	March 20, 2015
N/A	PX0485	Three years	March 20, 2015
N/A	PX0488	Three years	March 20, 2015
N/A	PX0490	Three years	March 20, 2015
N/A	PX0496	Three years	March 20, 2015
N/A	PX0497	Three years	March 20, 2015
N/A	PX0498	Three years	March 20, 2015
N/A	PX0499	Three years	March 20, 2015
N/A	PX0500	Three years	March 20, 2015
N/A	PX0501	Three years	March 20, 2015
N/A	PX0502	Three years	March 20, 2015
N/A	PX0503	Three years	March 20, 2015
N/A	PX0504	Three years	March 20, 2015
N/A	PX0505	Three years	March 20, 2015
N/A	PX0506	Three years	March 20, 2015
N/A	PX0507	Three years	March 20, 2015
N/A	PX0508	Three years	March 20, 2015
N/A	PX0509	Three years	March 20, 2015
N/A	PX0510	Three years	March 20, 2015
N/A	PX0511	Three years	March 20, 2015
N/A	PX0512	Three years	March 20, 2015
N/A	PX0513	Three years	March 20, 2015
N/A	PX0514	Three years	March 20, 2015
N/A	PX0515	Three years	March 20, 2015
N/A	PX0516	Three years	March 20, 2015
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N/A		Three years	
N/A	PX0521	Three years	March 20, 2015
N/A	PX0522	Three years	March 20, 2015

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	rice in the contract of		Tornari Catalinaji
N/A	PX0523	Three years	March 20, 2015
N/A	PX0524	Three years	March 20, 2015
N/A	PX0525	Three years	March 20, 2015
N/A	PX0526	Three years	March 20, 2015
N/A	PX0527	Three years	March 20, 2015
N/A	PX0528	Three years	March 20, 2015
N/A	PX0529	Three years	March 20, 2015
N/A	PX0530	Three years	March 20, 2015
N/A	PX0531	Three years	March 20, 2015
N/A	PX0532	Three years	March 20, 2015
N/A	PX0533	Three years	March 20, 2015
N/A	PX0534	Three years	March 20, 2015
N/A	PX0543	Three years	March 20, 2015
N/A	PX0544	Three years	March 20, 2015
N/A	PX0552	Three years	March 20, 2015
N/A	PX0553	Three years	March 20, 2015
N/A	PX0555	Three years	March 20, 2015
N/A	PX0557	Three years	March 20, 2015
N/A	PX0558	Three years	March 20, 2015
N/A	PX0559	Three years	March 20, 2015
N/A	PX0562	Three years	March 20, 2015
N/A	PX0564	Three years	March 20, 2015
N/A	PX0566	Three years	March 20, 2015
N/A	PX0568	Three years	March 20, 2015
N/A	PX0569	Three years	March 20, 2015
N/A	PX0572	Three years	March 20, 2015
N/A	PX0573	Three years	March 20, 2015
N/A	PX0575	Three years	March 20, 2015
N/A	PX0576	Three years	March 20, 2015
N/A	PX0577	Three years	March 20, 2015
N/A	PX0578	Three years	March 20, 2015
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N/A	PX0580	Three years	March 20, 2015
N/A	PX0581	Three years	March 20, 2015
N/A	PX0582	Three years	March 20, 2015
N/A	PX0583	Three years	March 20, 2015
N/A	PX0584	Three years	March 20, 2015
N/A	PX0586	Three years	March 20, 2015
N/A	PX0587	Three years	March 20, 2015
N/A	PX0588	Three years	March 20, 2015
N/A	PX0590	Three years	March 20, 2015
N/A	PX0591	Three years	March 20, 2015
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			March 20, 2015
N/A N/A	PX0594 PX0595	Three years	March 20, 2015
N/A N/A	PX0596	Three years	March 20, 2015 March 20, 2015
N/A N/A	PX0597	Three years	
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	PX0598	Three years	March 20, 2015
N/A N/A	PX0599	Three years	March 20, 2015
	PX0600	Three years	March 20, 2015
N/A	PX0601	Three years	March 20, 2015
N/A	PX0603	Three years	March 20, 2015
N/A	PX0604	Three years	March 20, 2015
N/A	PX0605	Three years	March 20, 2015
N/A	PX0606	Three years	March 20, 2015
N/A	PX0608	Three years	March 20, 2015
N/A	PX0611	Three years	March 20, 2015
N/A	PX0612	Three years	March 20, 2015
N/A	PX0613	Three years	March 20, 2015
N/A	PX0614	Three years	March 20, 2015
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N/A	PX0617	Three years	March 20, 2015
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N/A	PX0620	Three years	March 20, 2015
N/A	PX0623	Three years	March 20, 2015
N/A	PX0624	Three years	March 20, 2015
N/A	PX0625	Three years	March 20, 2015
N/A	PX0627	Three years	March 20, 2015
N/A	PX0628	Three years	March 20, 2015
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N/A	PX0635	Three years	March 20, 2015
N/A	PX0636	Three years	March 20, 2015
N/A	PX0637	Three years	March 20, 2015
N/A	PX0638	Three years	March 20, 2015
N/A	PX0639	Three years	March 20, 2015
N/A	PX0640	Three years	March 20, 2015
N/A	PX0641	Three years	March 20, 2015
N/A	PX0642	Three years	March 20, 2015
N/A	PX0643	Three years	March 20, 2015
N/A	PX0644	Three years	March 20, 2015
N/A	PX0645	Three years	March 20, 2015
N/A	PX0646	Three years	March 20, 2015
N/A	PX0647	Three years	March 20, 2015
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			M 1 20 2015
N/A N/A	PX0649	Three years	March 20, 2015
N/A N/A	PX0650	Three years	March 20, 2015
	PX0651	Three years	March 20, 2015
N/A	PX0652	Three years	March 20, 2015
N/A	PX0653	Three years	March 20, 2015
N/A	PX0654	Three years	March 20, 2015
N/A	PX0655	Three years	March 20, 2015
N/A	PX0656	Three years	March 20, 2015
N/A	PX0658	Three years	March 20, 2015
N/A	PX0675	Three years	March 20, 2015
N/A	PX0676	Three years	March 20, 2015
N/A	PX0678	Three years	March 20, 2015
N/A	PX0679	Three years	March 20, 2015
N/A	PX0681	Three years	March 20, 2015
N/A	PX0698	Three years	March 20, 2015
N/A	PX0699	Three years	March 20, 2015
N/A	PX0700	Three years	March 20, 2015
N/A	PX0702	Three years	March 20, 2015
N/A	PX0703	Three years	March 20, 2015
N/A	PX0706	Three years	March 20, 2015
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N/A	PX0708	Three years	March 20, 2015
N/A	PX0709	Three years	March 20, 2015
N/A	PX0710	Three years	March 20, 2015
N/A	PX0711	Three years	March 20, 2015
N/A	PX0712	Three years	March 20, 2015
N/A	PX0717	Three years	March 20, 2015
N/A	PX0718	Three years	March 20, 2015
N/A	PX0719	Three years	March 20, 2015
N/A	PX0720	Three years	March 20, 2015
N/A	PX0721	Three years	March 20, 2015
N/A	PX0723	Three years	March 20, 2015
N/A	PX0724	Three years	March 20, 2015
N/A	PX0725	Three years	March 20, 2015
N/A	PX0726	Three years	March 20, 2015
N/A	PX0727	Three years	March 20, 2015
N/A	PX0728	Three years	March 20, 2015
N/A	PX0729	Three years	March 20, 2015
N/A	PX0730	Three years	March 20, 2015
N/A	PX0731	Three years	March 20, 2015
N/A	PX0732	Three years	March 20, 2015
N/A	PX0733	Three years	March 20, 2015
N/A	PX0734	Three years	March 20, 2015
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N/A	PX0736	Three years	March 20, 2015
N/A	PX0737	Three years	March 20, 2015
N/A	PX0738	Three years	March 20, 2015
N/A	PX0739	Three years	March 20, 2015
N/A	PX0740	Three years	March 20, 2015
N/A	PX0741	Three years	March 20, 2015
N/A	PX0742	Three years	March 20, 2015
N/A	PX0743	Three years	March 20, 2015
N/A	PX0744	Three years	March 20, 2015
N/A	PX0745	Three years	March 20, 2015
N/A	PX0746	Three years	March 20, 2015
N/A	PX0747	Three years	March 20, 2015
N/A	PX0748	Three years	March 20, 2015
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N/A	PX0755	Three years	March 20, 2015
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N/A	PX0760	Three years	March 20, 2015
N/A	PX0761	Three years	March 20, 2015
N/A	PX0762	Three years	March 20, 2015
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N/A	PX0768	Three years	March 20, 2015
N/A	PX0769	Three years	March 20, 2015
N/A	PX0770	Three years	March 20, 2015
N/A	PX0771	Three years	March 20, 2015
N/A	PX0772	Three years	March 20, 2015
N/A	PX0773	Three years	March 20, 2015
N/A	PX0774	Three years	March 20, 2015
N/A	PX0775	Three years	March 20, 2015
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N/A	PX3042	Three years	March 20, 2015
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N/A	PX3096	Three years	March 20, 2015
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N/A	PX3519	Three years	March 20, 2015
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N/A	PX4586	Three years	March 20, 2015
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N/A	PX4604	Three years	March 20, 2015
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N/A	PX4648	Three years	March 20, 2015
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N/A	PX4660	Three years	March 20, 2015
N/A	PX4662	Three years	March 20, 2015
N/A	PX4663	Three years	March 20, 2015
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N/A	PX4672	Three years	March 20, 2015
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N/A	PX4707	Three years	March 20, 2015
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N/A	PX4711	Three years	March 20, 2015
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N/A	PX4801	Three years	March 20, 2015
N/A	PX4802	Three years	March 20, 2015

DECLARATION OF ROBERT SEHRING

DECLARATION OF HENRY M. SEYBOLD, JR.