

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

AB ELECTROLUX, ELECTROLUX NORTH  
AMERICA, INC., AND GENERAL ELECTRIC  
COMPANY,

*Defendants.*

Case No. 1:15-cv-01039-EGS

**NOTICE OF DEFENDANTS' PROPOSED EDITS TO PRETRIAL ORDER**

Pursuant to the Court's November 1, 2015 Minute Order, Defendants file the attached edits, comments, and suggestions to the draft pre-trial order. For ease of review, Defendants attach a redline to the Court's draft pre-trial order at Appendix A and a clean revised draft pre-trial order at Appendix B. The enclosed suggested edits are intended to synthesize the Court's prior rulings regarding the treatment of Confidential Information (and other issues) and to provide clarity regarding to the parties and non-parties regarding the same. Defendants have closely reviewed the relevant Orders from *Federal Trade Commission v. Sysco, et al.*, No. 15-cv-256-APM (Dkt. Nos. 87, 141), and *ASPCA v. Feld Entertainment*, No. 03-cv-2006-EGS (Dkt. No. 373), and have suggested incorporating certain processes or procedures from these cases. Due to the time constraints, Defendants have been unable to meet and confer with the Government regarding these proposed edits, but are willing to do so.

Dated: November 2, 2015

Respectfully submitted,

*/s/ Paul T. Denis*

*(with permission, by John M. Majoras)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of November, 2015, I caused this document to be filed electronically and served electronically via ECF pursuant to LCvR 5.4. Notice of this filing will be sent to all parties by operation of the court's electronic filing system or by email and U.S. mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing.

Dated: November 2, 2015

Respectfully submitted,

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