

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



IN THE MATTER OF

LOUISIANA REAL ESTATE
APPRAISERS BOARD,

RESPONDENT.

PUBLIC

DOCKET NO. 9374

**NON-PARTY SERVICELINK VALUATION SOLUTIONS, LLC'S UNOPPOSED
MOTION FOR IN CAMERA TREATMENT**

Pursuant to Rule 3.45(b) of the Federal Trade Commission's ("FTC") Rules of Practice, 16 C.F.R. § 3.45(b), non-party ServiceLink Valuation Solutions, LLC ("ServiceLink") respectfully moves this Court for *in camera* treatment of five of ServiceLink's sensitive, confidential business documents (the "Confidential Documents"). ServiceLink produced these documents, among others, in response to a Civil Investigative Demand ("CID") and subpoena in this matter.¹ The FTC has notified ServiceLink that it intends to introduce seven of ServiceLink's documents, including the Confidential Documents, into evidence at the administrative trial in this matter. *See* Letter from the FTC dated June 20, 2019 (attached as Exhibit A). Similarly, the Louisiana Real Estate Appraisers Board ("Appraisers Board") has also advised ServiceLink that it intends to use three of ServiceLink's documents, including the Confidential Documents, at trial. *See* Letter from James Kovacs, Constantine Canon LLP dated June 19, 2019 (attached as Exhibit B).

¹ The CID was issued to ServiceLink IP Holding Company, LLC. ServiceLink requested that the CID be re-issued in the name of ServiceLink Valuation Solutions, LLC, ServiceLink's licensed Appraisal Management Company. ServiceLink responded to the CID on behalf of ServiceLink Valuation Solutions, LLC, and the subpoena was issued in the name of ServiceLink Valuation Solutions, LLC. For purposes of this Motion, the term "ServiceLink" means "ServiceLink Valuation Solutions, LLC."

As relevant to this action, ServiceLink is an Appraisal Management Company (“AMC”) engaged by lenders to obtain real estate appraisals. ServiceLink hires appraisers in the locations where it does business, engages them to complete appraisals, pays the appraisers for their services, and then provides an appraisal report to the lender for a fee. As an AMC, ServiceLink has developed confidential, proprietary, and sensitive business strategies and information.

All of the materials for which ServiceLink is seeking *in camera* treatment are confidential business documents, such that if they were to become part of the public record, ServiceLink would be significantly harmed in its ability to compete as an AMC. For the reasons discussed in this Motion, ServiceLink requests that this Court afford the Confidential Documents *in camera* treatment for a period of five years. In support of this Motion, ServiceLink relies on the Declaration of Danny Wiley, ServiceLink’s Chief Valuation Officer (the “Wiley Declaration”), attached as Exhibit C, which provides additional details on the documents for which ServiceLink is seeking *in camera* treatment.

I. The Documents for Which Protection is Sought

ServiceLink seeks *in camera* treatment for the following Confidential Documents, copies of which are attached as Exhibit D.

Exhibit No.	Description	Date	Beginning Bates No.	Ending Bates No.
CX3291	Email correspondence discussing updates to ServiceLink’s customary and reasonable fees	4/5/17	FTC-SVC-0000060	FTC-SVC-0000065
CX3292	Spreadsheet reflecting a summary of ServiceLink’s Appraisal Order Volume Mix for 2016	3/31/17	FTC-SVC-0000128	FTC-SVC-0000128
CX3294	Internal ServiceLink document reflecting ServiceLink’s Customary and Reasonable Appraisal Fees Methodology	6/30/17	FTC-SVC-0002277	FTC-0002288
RX0705	Internal ServiceLink document reflecting ServiceLink’s Assignment Logic	6/21/16	FTC-PROD-0006041	FTC-PROD-0006043

RX0706	Spreadsheet reflecting ServiceLink's Appraisal Orders in Louisiana from January 1, 2012 through January 29, 2016 produced in response to CID	7/26/16	FTC-PROD-0006039	FTC-PROD-0006039
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II. ServiceLink's Documents are Confidential Business Records that are "Secret and Material" to ServiceLink's Business Such that Public Disclosure Would Result in Serious Injury to ServiceLink

Courts generally attempt to "protect confidential business information from unnecessary airing." *H.P. Hood & Sons, Inc.*, 58 F.T.C. 1184, 1188 (1961). "There can be no question that the confidential records of businesses involved in Commission proceedings should be protected insofar as possible." *Id.* at 1184. Against this backdrop, *in camera* treatment of material is appropriate when "public disclosure will likely result in a clearly defined, serious injury to the person, partnership, or corporation requesting" such treatment. 16 C.F.R. § 3.45(b). The proponent of *in camera* treatment demonstrates serious competitive injury by showing that the documents are sufficiently secret and sufficiently material to the business. *In re Jerk, LLC*, et. al., Order on Motion for In Camera Treatment (F.T.C. Docket No. 9361) (Feb. 23, 2015) (quoting *In re General Foods Corp.*, 95 F.T.C. 352, 355 (1980)); *In re Dura Lube Corp.*, 1999 F.T.C. LEXIS 255, at *5 (1999).

In assessing both the secrecy and materiality of documents, the Court may consider (1) the extent to which the information is known outside of the business; (2) the extent to which it is known by employees and others involved in the business; (3) the extent of measures taken to guard the secrecy of the information; (4) the value of the information to the business and its competitors; (5) the amount of effort or money expended in developing the information; and (6) the ease or difficulty with which the information could be acquired or duplicated by others. *In re Bristol-Myers Co.*, 90 F.T.C. 455, 456-57 (1977).

Here, the Confidential Documents are both secret and material to ServiceLink's business. The Confidential Documents fit into three categories: (1) documents reflecting ServiceLink's confidential and proprietary Customary and Reasonable Fees Methodology; (2) documents detailing ServiceLink's confidential internal processes for assigning appraisers to appraisal projects; and (3) confidential documents reflecting ServiceLink's product mix and sales figures. As discussed in the Wiley Declaration, all of these documents contain information of competitive significance to ServiceLink, including pricing information, business strategies, internal processes, and key performance metrics. ServiceLink does not disclose any of these types of information to the public or its competitors. Further, ServiceLink relies on this type of information to remain competitive in the AMC space. Indeed, when ServiceLink produced the Confidential Documents, it took measures to maintain confidentiality by designating the documents "Confidential" pursuant to the procedures contained at 15 U.S.C. § 57b-2. Because of the highly confidential and proprietary nature of the information and its materiality to ServiceLink's ability to compete in the AMC market, *in camera* treatment is appropriate.

Further, disclosure of the Confidential Documents will result in the loss of a business advantage to ServiceLink. *See In re Dura Lube Corp.*, 1999 FTC LEXIS 255 at *7 (Dec. 23, 1999) ("The likely loss of business advantages is a good example of a 'clearly defined, serious injury.'") The Confidential Documents are material to ServiceLink's business because they bear on ServiceLink's ability to compete in the AMC market. Making such documents public would result in a loss of business

advantage that ServiceLink has built as the result of its own substantial investments in the development of its proprietary information and business strategies.

In camera treatment of material is also warranted because ServiceLink is a non-party to the proceeding. The FTC has recognized that “a request for *in camera* treatment by a non-party warrants ‘special solicitude.’” See *In re Pom Wonderful, Inc.*, 2011 WL 2160777 (Docket No. 9344, May 9, 2011); see also *In re Kaiser Aluminum & Chem. Corp.*, 103 F.T.C. 500, 500 (1984) (holding third party requests “deserve special solicitude” and “[a]s a policy matter, extensions of confidential or *in camera* treatment in appropriate cases involving third party bystanders encourages cooperation with future adjudicative discovery requests.”)

III. The Confidential Documents Contain Proprietary Business Information which Will Remain Sensitive Over Time and Thus, In Camera Treatment of Five Years is Justified and Reasonable

Because of the confidential and proprietary nature of the Confidential Documents, as well as their continued competitive significance, protection is appropriate to ensure that ServiceLink does not suffer competitive harm. While there is a “presumption that *in camera* treatment will not be granted for information that is more than three years old” *in camera* treatment is appropriate where applicants demonstrate that the material remains “competitively sensitive.” See *In re 1-800 Contacts*, 2017 FTC LEXIS 55, *3 (2017). Although some of the Confidential Documents for which ServiceLink seeks *in camera* treatment are approximately three years old, these documents reflect confidential, proprietary, and competitive information that ServiceLink continues to use to this day in executing its business strategy, and thus, should be afforded *in camera* protection.

Further, “in determining the length of time for which *in camera* treatment is appropriate, the distinction between trade secrets and ordinary business records” – such as “pricing to customers, business costs and profits, as well as business plans,” – is “important, because ordinary business records are granted less protection than trade secrets.” *See In re 1-800 Contacts*, 2017 FTC LEXIS 55, *4 (2017). As the documents here are “ordinary business records,” ServiceLink respectfully requests that the Confidential Documents be afforded *in camera* protection for a period of five years. This request is narrowly tailored to reflect that the Confidential Documents are “ordinary business records” and as such, their competitive nature will not continue indefinitely. *See id.* (providing *in camera* treatment of two to five years as typically appropriate for business records).

IV. Conclusion

For the reasons set forth above and in the accompanying Wiley Declaration, ServiceLink respectfully requests that this Court grant *in camera* treatment for the Confidential Documents in their entirety for a period of five years.

Dated: August 1, 2019

Respectfully Submitted,

By: /s/ Kristina N. Burland

Lauren P. McKenna, # 59145

Kristina Burland, # 314295

FOX ROTHSCHILD LLP

2000 Market Street

20th Floor

Philadelphia, PA 19103-3222

Telephone: (215) 299-2000

**Counsel for non-party ServiceLink
Valuation Solutions, LLC**

STATEMENT REGARDING MEET AND CONFER

The undersigned certifies that counsel for non-party ServiceLink Valuation Solutions, LLC (“ServiceLink”) notified counsel for the parties by phone on July 12, 2019 that it would be seeking *in camera* treatment of the Confidential Documents. Both counsel for the Federal Trade Commission and counsel for the Louisiana Real Estate Appraisers Board indicated they would not object to ServiceLink’s motion and the relief requested therein.

Dated: August 1, 2019

By: /s/ Kristina N. Burland

Lauren P. McKenna, # 59145

Kristina Burland, # 314295

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2000 Market Street

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**Counsel for non-party ServiceLink
Valuation Solutions, LLC**

EXHIBIT A



Bureau of Competition
Anticompetitive Practices Division

UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

June 20, 2019

Via E-Mail

ServiceLink
c/o Eric Evans, Esq.
eric.evans@svclnk.com

RE: *In re Louisiana Real Estate Appraisers Board*, FTC Dkt. No. 9374

Dear Mr. Evans:

By this letter we are providing formal notice, pursuant to Rule 3.45(b) of the Commission's Rules of Practice, 16 C.F.R. § 3.45(b), that Complaint Counsel intend to offer the documents and testimony referenced in the enclosed Attachment A into evidence in the administrative trial in the above-captioned matter. The administrative trial is currently scheduled to begin on September 17, 2019. All exhibits admitted into evidence become part of the public record unless *in camera* status is granted by Administrative Law Judge D. Michael Chappell.

For documents or testimony that include sensitive or confidential information that you do not want on the public record, you must file a motion seeking *in camera* status or other confidentiality protections pursuant to 16 C.F.R §§ 3.45, 4.10(g). Judge Chappell may order that materials, whether admitted or rejected as evidence, be placed *in camera* only after finding that their public disclosure will likely result in a clearly defined, serious injury to the person, partnership, or corporation requesting *in camera* treatment.

Motions for *in camera* treatment for evidence to be introduced at trial must meet the strict standards set forth in 16 C.F.R. § 3.45 and explained in *In re 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re Jerk*, 2015 FTC LEXIS (Feb. 23, 2015); and *In re Basic Research, Inc.*, 2006 FTC LEXIS 14 (Jan. 25, 2006). Motions also must be supported by a declaration or affidavit by a person qualified to explain the confidential nature of the documents. *In re North Texas Specialty Physicians*, 2004 FTC LEXIS 66 (April 23, 2004). You must also provide one copy of the documents for which *in camera* treatment is sought to the Administrative Law Judge.

Under the operative Fourth Revised Scheduling Order, your deadline for filing motions seeking *in camera* treatment is **August 2, 2019**.

If you have any questions, please feel free to contact me at (202) 326-3139.

Sincerely,

s/ Lisa B. Kopchik

Lisa B. Kopchik

Counsel Supporting the Complaint

Attachment A

Exhibit No.	Description	Date	Bates - Begin	Bates - End
CX3289	Email from Laura Raposo to Marion Hanson, Eric Evans, Danny Wiley, et al. re: LREAB/ iMortgage-Request for Rehearing and LREAB Findings of Fact w/Attach: Request for Rehearing -- iMortgage Services, LLC (file stamped) PDF, Ltr to Dean Kelker and Robert R	1/5/2016	FTC-SVC-0000029	FTC-SVC-0000040
CX3290	Email from Laura Raposo to Heather Whipkey re: Dave - requesting your written approval to leave C and R minimum at 7th percentile for 2017 w/Attach: image004.png, image005.png, image001.png	5/22/2017	FTC-SVC-0000041	FTC-SVC-0000045
CX3291	Email from Laura Raposo to Heather Whipkey re: periodic update to Servicelink's customary and reasonable fees w/Attach: image002.png, image003.png	4/5/2017	FTC-SVC-0000060	FTC-SVC-0000065
CX3292	Spreadsheet: 2016_Appraisal_Order_Volume_Mix_Summary.xlsx	00/00/16	FTC-SVC-0000128	FTC-SVC-0000128
CX3293	Email from Laura Raposo to Eric Evans, Heather Whipkey, and Danny Wiley re: Louisiana C&R w/Attach: image001.png, image002.png	12/29/2015	FTC-SVC-0000208	FTC-SVC-0000213
CX3294	Document: Customary and Reasonable Appraisal Fees	00/00/0000	FTC-SVC-0002277	FTC-SVC-0002288
CX3333	Letter from Eric Evans to Lisa B. Kopchik re: Civil Investigative Demand File No. 161-0068	7/28/2016	FTC-PROD-0006035	FTC-PROD-0006038

EXHIBIT B

CONSTANTINE CANNON LLP

WASHINGTON | NEW YORK | SAN FRANCISCO | LONDON

James J. Kovacs
Attorney
202-204-3518
jkovacs@constantinecannon.com

June 19, 2019

Via E-Mail and Mail

Eric J. Evans
Chief Regulatory Counsel
ServiceLink Valuation Solutions, LLC
1200 Cherrington Parkway
Moon Township, PA 15108

Re: *In the Matter of Louisiana Real Estate Appraisers Board*, FTC Dkt. 9374

Dear Mr. Evans,

This letter will constitute notice to ServiceLink Valuation Solutions, LLC, pursuant to 16 C.F.R. § 3.45(b) and paragraph 7 of the July 6, 2017 Scheduling Order in the above-captioned matter, that Respondent Louisiana Real Estate Appraisers Board (“LREAB”) intends to use the materials referenced on the attached Exhibit A as evidence at the administrative trial scheduled to begin on September 17, 2019. All exhibits admitted into evidence become part of the public record unless *in camera* treatment is granted by Administrative Law Judge D. Michael Chappell.

Pursuant to 16 C.F.R. § 3.45, for documents or testimony that you believe include sensitive or confidential information that you do not want on the public record, you must file a motion for *in camera* status with Judge Chappell. As indicated in paragraph 7 of the July 6, 2017 Scheduling Order, motions for *in camera* treatment for evidence to be introduced at trial must meet the strict standards set forth in 16 C.F.R. § 3.45, explained in *In re I-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re Jerk, LLC*, 2015 FTC LEXIS (Feb. 23, 2015); *In re Basic Research, Inc.*, 2006 FTC LEXIS 14 (Jan. 25, 2006). Motions also must be supported by a declaration or affidavit by a person qualified to explain the confidential nature of the documents. *In re I-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re North Texas Specialty Physicians*, 2004 FTC LEXIS 66 (April 23, 2004). Each party or non-party that files a motion for *in camera* treatment shall provide one copy of the documents for which *in camera* treatment is sought to the Administrative Law Judge.

CONSTANTINE CANNON LLP

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June 19, 2019

Page 2

Under the Fourth Revised Scheduling Order dated March 26, 2019, the deadline for filing motions seeking in camera status is **August 2, 2019**.

Please contact me via email or at (202) 204-3518 if you have any questions regarding the foregoing.

Best regards,

/s/ James J. Kovacs

James J. Kovacs

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EXHIBIT A

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June 19, 2019

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Exhibit #	Description	Date	Beg Bates	End Bates
RX0704	Letter from Eric Evans to Lisa Kopchik re: CID File No. 161-0068	7/28/2016	FTC-PROD-0006035	FTC-PROD-0006038
RX0705	ServiceLink Valuation Services document SLVM Assignment Logic	7/28/2016	FTC-PROD-0006041	FTC-PROD-0006043
RX0706	ServiceLink Valuation Services CID data spreadsheet	7/28/2016	FTC-PROD-0006039	FTC-PROD-0006039

EXHIBIT C

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

IN THE MATTER OF

LOUISIANA REAL ESTATE
APPRAISERS BOARD,

RESPONDENT.

DOCKET NO. 9374

**DECLARATION OF DANNY WILEY IN SUPPORT OF NON-PARTY
SERVICELINK VALUATION SOLUTIONS, LLC'S UNOPPOSED MOTION
FOR IN CAMERA TREATMENT**

I, Danny Wiley, hereby declare as follows:

1. I am ServiceLink Valuation Solution, LLC's ("ServiceLink") Chief Valuation Officer. I make this Declaration in support of ServiceLink's Motion for *In Camera* Treatment (the "Motion"). I have personal knowledge of the matters stated herein and, if called upon to do so, could competently testify about them.

2. I have reviewed and am familiar with the documents ServiceLink produced in the above-captioned matter in response to a civil investigative demand ("CID") and subpoena from the Federal Trade Commission ("FTC"). Given my position at ServiceLink, I am familiar with the type of information contained in the documents at issue and its competitive significance to ServiceLink. Based on my review of the documents, my knowledge of ServiceLink's business, and my familiarity with the confidentiality protection afforded this type of information by ServiceLink, I submit that the disclosure of these documents to the public and ServiceLink's competitors would cause ServiceLink serious competitive injury.

3. As relevant to this action, ServiceLink is an Appraisal Management Company (“AMC”) engaged by lenders to obtain real estate appraisals. ServiceLink hires appraisers in the locations where it does business, engages them to complete appraisals, pays the appraisers for their services, and then provides an appraisal report to the lender for a fee. As an AMC, ServiceLink has developed confidential, proprietary, and sensitive business strategies and information, including a Customary and Reasonable Fee Methodology which sets the parameters of the fees ServiceLink pays to appraisers and an assignment process that establishes how ServiceLink selects appraisers for an assignment. Further, ServiceLink maintains confidential business documents that reflect ServiceLink’s business processes, product offerings, and sales activities. Such documents distinguish ServiceLink’s business from its competitors and are critical to its business development and its ability to remain competitive.

4. The FTC informed ServiceLink that it intends to use seven documents ServiceLink produced in response to the CID and subpoena at the administrative hearing in this matter. Further, counsel for the Louisiana Real Estate Appraisers Board has notified ServiceLink that it intends to use three documents ServiceLink produced in response to the CID and subpoena at the administrative hearing in this matter. Of these ten documents, five documents are particularly sensitive and contain confidential and proprietary information. As described in the Motion, ServiceLink seeks *in camera* protection of the following five documents:

Exhibit No.	Description	Date	Beginning Bates No.	Ending Bates No.
CX3291	Email correspondence discussing updates to ServiceLink’s customary and reasonable fees	4/5/17	FTC-SVC-0000060	FTC-SVC-0000065
CX3292	Spreadsheet reflecting a summary of ServiceLink’s Appraisal Order Volume Mix for 2016	3/31/17	FTC-SVC-0000128	FTC-SVC-0000128

CX3294	Internal ServiceLink document reflecting ServiceLink's Customary and Reasonable Appraisal Fees Methodology.	6/30/17	FTC-SVC-0002277	FTC-0002288
RX0705	Internal ServiceLink document reflecting ServiceLink's Assignment Logic	6/21/16	FTC-PROD-0006041	FTC-PROD-0006043
RX0706	Spreadsheet reflecting ServiceLink's Appraisal Orders in Louisiana from January 1, 2012 through January 29, 2016 produced in response to CID	7/26/16	FTC-PROD-0006039	FTC-PROD-0006039

5. **CX3291 and CX3294** are related documents which discuss ServiceLink's methodology for determining the customary and reasonable fees ("Customary and Reasonable Fee Methodology") it pays to appraisers to ensure compliance with Presumption One under the Dodd-Frank Wall Street Reform Act and Consumer Protection Act.

CX3294 is an internal ServiceLink study entitled "Customary and Reasonable Fees." The document is identified on the bottom left-hand corner with a stamp that states: "Proprietary and Confidential: Not for Distribution Without ServiceLink's Prior Written Approval." **CX3294** details how ServiceLink developed its Customary and Reasonable Fee Methodology using a detailed analysis² of proprietary data regarding the fees ServiceLink historically paid to appraisers throughout the country for multiple ServiceLink products. It then explains how ServiceLink interpreted this data to set the Customary and Reasonable fee that ServiceLink will pay an appraiser for a given product and in a given geographic area. As noted in **CX3294**, ServiceLink performed the data analytics underlying its Customary and Reasonable Fee Methodology in 2012, 2015, and 2017, and in turn, ServiceLink updated its Customary and Reasonable Fee Methodology based on findings from its updated data analysis in 2015 and 2017. **CX3921** is a 2017 email that reflects the data analysis ServiceLink performed in both 2015 and 2017 to

² The data analytics were performed by an entity within the Black Knight family of companies, of which ServiceLink was a member until October 2017.

update its Customary and Reasonable Fee Methodology as well as ServiceLink's decisions to update its Customary and Reasonable Fee Methodology to reflect the findings of the 2015 and 2017 data analysis.

CX3291 and CX3294 are confidential, proprietary, and competitively sensitive documents that include details about how ServiceLink determines the fees that it will pay to appraisers; information about ServiceLink's product mix; and fee breakpoints based on ServiceLink's product mix and geographic footprint. ServiceLink has also devoted significant resources to developing its Customary and Reasonable Fee Methodology. Further, as an AMC, ServiceLink relies in part on its relationship with appraisers and the fees it pays to them. Public disclosure of ServiceLink's Customary and Reasonable Fee Methodology could impair ServiceLink's ability to compete for appraisal services. ServiceLink does not make its Customary and Reasonable Fee Methodology available to its competitors or customers and ServiceLink does not share this information with non-ServiceLink personnel in the ordinary course of business. Indeed, **CX3294** specifically states that ServiceLink's Customary and Reasonable Fees schedule is "Proprietary and Confidential" and that it should not be distributed "Without ServiceLink's prior written approval."

6. **CX3292** is a spreadsheet compiled by ServiceLink in 2017 that reflects all products offered by ServiceLink, the order volume for each product, and the percentage of total volume for each product. This spreadsheet contains confidential and competitively sensitive information about ServiceLink's product mix and sales data which are integral to ServiceLink's business model and business strategy. If publicly disclosed, this information would allow ServiceLink's competitors to gain leverage

against ServiceLink in the marketplace, or to otherwise damage ServiceLink's ability to compete for appraisal services. ServiceLink does not make this information publically available, nor does it share this information with its competitors.

7. **RX0705** is an internal ServiceLink document that sets forth ServiceLink's logic for assigning an appraiser to an appraisal project. This document reflects ServiceLink's confidential internal business processes for appraiser assignments and is not shared with ServiceLink's competitors because of its competitive significance. Further, it is fundamental to ServiceLink's business that it maintain good relationships with the appraisers that it retains. Public disclosure of this document could harm those relationships because it provides a roadmap that could be manipulated by an appraiser to obtain more assignments from ServiceLink. Such manipulation would have a detrimental effect on ServiceLink's business relationship with other appraisers and cause ServiceLink competitive harm.

8. **RX0706** is a spreadsheet that ServiceLink prepared in response to the CID and subpoena, which lists all appraisals that ServiceLink ordered in Louisiana during the relevant time period. The spreadsheet identifies the type of appraisal performed and the fee paid to the appraiser for every listed appraisal. As such, this document reflects confidential and competitively sensitive information about ServiceLink's product mix, order volume, and appraisal fees. If publicly disclosed, this information would allow ServiceLink's competitors to gain leverage against ServiceLink in the marketplace, or to otherwise damage ServiceLink's ability to compete for appraisal services. ServiceLink does not make this information publically available, nor does it share this information with its competitors.

9. As described above, **CX3291, CX3292, CX3294, RX0705, and RX0706** contain confidential, proprietary, and sensitive information that are critical to ServiceLink's business model. The competitive significance of these documents is unlikely to decrease in the near future, and therefore, protection from public disclosure for a period of five years is respectfully requested.

I declare under penalty of perjury that the foregoing is true and correct. Executed

7/30/19 at Moon Township, PA.



Danny Wiley, Chief Valuation Officer
ServiceLink Valuation Services

EXHIBIT D

**DOCUMENTS MARKED CONFIDENTIAL
REDACTION IN THEIR ENTIRETY REQUESTED**

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2019, I, Kristina Burland, caused to be served the following documents on the parties listed below by the manner indicated:

- NON-PARTY SERVICELINK VALUATION SOLUTIONS, LLC's ("SERVICELINK") UNOPPOSED MOTION FOR IN CAMERA TREATMENT (PUBLIC VERSION AND NON-PUBLIC VERSION)
- PROPOSED ORDER

The Office of the Administrative Law Judge:

Served via electronic filing (public version) and overnight mail (non-public version)

D. Michael Chappell
Chief Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave., NW
Suite 110
Washington, DC, 20580

The Office of the Secretary

Served via electronic filing (public version) and overnight mail (non-public version)

Donald Clark
Office of the Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Room H-172
Washington, D.C. 20580

The Federal Trade Commission

Served via electronic filing (public version) and overnight mail (non-public version)

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Respondent

/s/ Kristina N. Burland
Kristina N. Burland

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES**

IN THE MATTER OF

LOUISIANA REAL ESTATE
APPRAISERS BOARD,

RESPONDENT.

PUBLIC

DOCKET NO. 9374

[PROPOSED] ORDER

Upon consideration of Non-Party ServiceLink Valuation Solutions, LLC's ("ServiceLink") Unopposed Motion for *In Camera* Treatment, it is HEREBY ORDERED that the following documents are to be provided *in camera* treatment for a period of five years from the date of this Order in their entirety.

Exhibit No.	Description	Date	Beginning Bates No.	Ending Bates No.
CX3291	Email correspondence discussing updates to ServiceLink's customary and reasonable fees	4/5/17	FTC-SVC-0000060	FTC-SVC-0000065
CX3292	Spreadsheet reflecting a summary of ServiceLink's Appraisal Order Volume Mix for 2016	3/31/17	FTC-SVC-0000128	FTC-SVC-0000128
CX3294	Internal ServiceLink document reflecting ServiceLink's Customary and Reasonable Appraisal Fees Methodology.	6/30/17	FTC-SVC-0002277	FTC-0002288
RX0705	Internal ServiceLink document reflecting ServiceLink's Assignment Logic	6/21/16	FTC-PROD-0006041	FTC-PROD-0006043
RX0706	Spreadsheet reflecting ServiceLink's Appraisal Orders in Louisiana from January 1, 2012 through January 29, 2016 produced in response to CID	7/26/16	FTC-PROD-0006039	FTC-PROD-0006039

Hon. Michael Chappell
Chief Administrative Law Judge

Date: _____, 2019

Notice of Electronic Service

I hereby certify that on August 01, 2019, I filed an electronic copy of the foregoing Non-Party ServiceLink Valuation Solutions, LLC Unopposed Motion for In Camera Treatment, with:

D. Michael Chappell
Chief Administrative Law Judge
600 Pennsylvania Ave., NW
Suite 110
Washington, DC, 20580

Donald Clark
600 Pennsylvania Ave., NW
Suite 172
Washington, DC, 20580

I hereby certify that on August 01, 2019, I served via E-Service an electronic copy of the foregoing Non-Party ServiceLink Valuation Solutions, LLC Unopposed Motion for In Camera Treatment, upon:

Lisa Kopchik
Attorney
Federal Trade Commission
LKopchik@ftc.gov
Complaint

Michael Turner
Attorney
Federal Trade Commission
mturner@ftc.gov
Complaint

Christine Kennedy
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