

#### IN THE COMPETITION APPEAL TRIBUNAL

Case No: 1295/5/7/18 (T)

**BETWEEN:** 

## (1) DAWSONGROUP PLC (2) DAWSONGROUP UK LIMITED (3) DAWSONGROUP TRUCK AND TRAILER LIMITED (4) DAWSONGROUP MATERIAL HANDLING LIMITED (5) DAWSONGROUP SWEEPERS LIMITED

Dawsongroup Claimants

- and -

(1) DAF TRUCKS N.V.
(2) DAF TRUCKS DEUTSCHLAND GMBH

(3) PACCAR INC.
(4) DAF TRUCKS LIMITED
(5) DAIMLER AG

(6) MERCEDES BENZ CARS UK LIMITED
(7) AKTHEBOLAGET VOLVO (PUBL)
(8) VOLVO LASTVAGNAR AB

(9) VOLVO GROUP TRUCKS CENTRAL EUROPE GMBH

(10) RENAULT TRUCKS SAS
(11) VOLVO GROUP UK LIMITED

Dawsongroup Defendants

AND BETWEEN

Case No: 1291/5/7/18 (T)

### (1) RYDER LIMITED(2) HILL HIRE LIMITED

Ryder Claimants

- and -

(1) MAN SE (2) MAN TRUCK & BUS SE (3) MAN TRUCK & BUS DEUTSCHLAND GMBH (4) MAN TRUCK AND BUS UK LIMITED (5) AB VOLVO (PUBL) (6) VOLVO LASTVAGNAR AB (7) VOLVO GROUP TRUCKS CENTRAL EUROPE GMBH (8) VOLVO GROUP UK LIMITED (9) RENAULT TRUCKS SAS (10) DAIMLER AG (11) MERCEDES BENZ CARS UK LIMITED (12) STELLANTIS N.V. (FORMERLY FIAT CHRYSLER AUTOMOBILES N.V.) (13) CNH INDUSTRIAL N.V. (14) **IVECO S.P.A.** (15) IVECO MAGIRUS AG (16) IVECO LIMITED (17) PACCAR INC. (18) DAF TRUCKS N.V. (19) DAF TRUCKS DEUTSCHLAND GMBH (20) DAF TRUCKS LIMITED

Ryder Defendants

Case No: 1343/5/7/20 (T)

# (1) DS SMITH PAPER LIMITED (2) DS SMITH LOGISTICS LIMITED (3) DS SMITH PACKAGING LIMITED (4) DS SMITH CORRUGATED PACKAGING LIMITED (5) DS SMITH (UK) LIMITED (6) DS SMITH RECYCLING UK LIMITED

**DS Smith Claimants** 

- and -

(1) TRATON SE (SUBSTITUTED FOR MAN SE)
(2) MAN TRUCK & BUS SE (FORMERLY MAN TRUCK & BUS AG)
(3) MAN TRUCK & BUS DEUTSCHLAND GMBH
(4) AB VOLVO (PUBL)
(5) VOLVO LASTVAGNAR AB
(6) VOLVO GROUP TRUCKS CENTRAL EUROPE GMBH
(7) RENAULT TRUCKS SAS
(8) DAIMLER AG
(9) STELLANTIS N.V. (FORMERLY FIAT CHRYSLER AUTOMOBILES N.V.)
(10) CNH INDUSTRIAL N.V.
(11) IVECO S.P.A
(12) IVECO MAGIRUS AG
(13) PACCAR INC
(14) DAF TRUCKS N.V.

DS Smith Defendants

- and -

(1) SCANIA AKTIEBOLAG (PUBL)(2) SCANIA CV ACTIEBOLAG (PUBL)(3) SCANIA DEUTSCHLAND GMBH

DS Smith Third Parties

#### CONSOLIDATED CONFIDENTIALITY RING ORDER

**UPON** the terms of this Order as set out below having been agreed between the Parties

**AND UPON** each of the persons named in Parts A and B of the Schedule to this Order giving a written undertaking to the Tribunal in the terms of Parts C or D respectively of the Schedule to this Order prior to receiving any Confidential Information (as defined below)

AND UPON it being agreed that this Order shall not create any obligation on any Party to disclose any document

#### IT IS ORDERED BY CONSENT THAT:

- 1A This Order replaces:
  - (i) the Confidentiality Ring Order dated 28 June 2022 in the Dawsongroup proceedings (which replaced the Confidentiality Ring Order dated 22 July 2021, which replaced the Confidentiality Ring Order dated 4 December 2020, which replaced the Confidentiality Ring Order dated 30 March 2020, which replaced the Confidentiality Ring Order dated 12 June 2019, which replaced the Confidentiality Ring Order dated 18 December 2018);
  - (ii) the Confidentiality Ring Order dated 4 December 2020 in the Ryder proceedings (which replaced the Confidentiality Ring Order dated 30 March 2020, which replaced the Confidentiality Ring Order dated 12 June 2019, which replaced the Confidentiality Ring Order dated 18 December 2018, which replaced the Confidentiality Ring Order dated 31 July 2018);
  - (iii) the Confidentiality Ring Order as agreed between the DS Smith Claimants and the Dawsongroup Claimants dated 15 October 2021; and
  - (iv) the Confidentiality Ring Order as agreed between the DS Smith Claimants and the Ryder Claimants dated 13 October 2021.
- 1B For the avoidance of doubt, this Order does not replace the Confidentiality Ring Order dated 22 July 2021 as agreed between the DS Smith Claimants and the DS Smith Defendants.

1C Each of the persons named in Parts A and B of the Schedule to this Order having given a written undertaking pursuant to the terms of the Confidentiality Ring Orders dated 18 December 2018, 12 June 2019, 30 March 2020, 4 December 2020, 22 July 2021 and 28 June 2022 in the Dawsongroup proceedings, the terms of the Confidentiality Ring Orders dated 31 July 2018, 18 December 2018, 12 June 2019, 30 March 2020 and 4 December 2020 in the Ryder proceedings, and/or the terms of the Confidentiality Ring Orders dated 18 December 2020, 22 July 2021 and 12 October 2021 in the DS Smith proceedings, such undertakings shall continue to apply in respect of this amended Confidentiality Ring Order, and thereby being designated as an Inner Confidentiality Ring Member and Outer Confidentiality Ring Member respectively.

#### **DEFINITIONS**

- 1. For the purposes of this Order:
  - 1.1 "*Common Disclosure*" means any document which has been identified by a disclosing Party, pursuant to the Directions Order dated 30 March 2020 in the Dawsongroup proceedings and the Directions Order of the same date in the Ryder proceedings, as having been disclosed to any Claimant(s) in two or more of the Trucks Proceedings.
  - 1.2 "Confidential Commission Document" means any document obtained by or submitted to the European Commission which is part of the European Commission's administrative file relating to its investigation in Case AT.39824 Trucks, to which the First to Third, Fifth, and Seventh to Tenth Defendants in the Dawsongroup proceedings and the First to Third, Fifth to Seventh, Ninth to Tenth, Twelfth to Fifteenth and Seventeenth to Nineteenth Defendants in the Ryder proceedings were granted access pursuant to the Notice on the rules for access to file OJ C 325 of 22 December 2005 (including any part of those documents and any information contained within those documents) which is disclosed by the Defendants in these Proceedings, save for those documents stated by certain of the

Defendants, Non Defendant Addressees and Scania in their letters/statements of 11 April 2019 to no longer require confidential treatment within a confidentiality ring.

- 1.3 "Confidential Information" means Inner Confidentiality Ring Information and/or Outer Confidentiality Ring Information.
- 1.4 "Dawsongroup proceedings" means the claim filed in the Chancery Division of the High Court of Justice on 15 December 2017 by the Dawsongroup Claimants against the Dawsongroup Defendants under Claim Number CP-2017-000020 and transferred to the Competition Appeal Tribunal by the Order of Mr Justice Roth dated 30 July 2018 under CAT Case No 1295/5/7/18 (T).
- 1.5 "Decision" means the Redacted Confidential Commission Decision as defined in paragraph 11(a) of the Directions Order made by Mrs Justice Rose on 18 December 2017 in Claim No. HC-2016-003422.
- 1.6 "DS Smith proceedings" means the claim filed in the Chancery Division of the High Court of Justice by the DS Smith Claimants under Claim Number CP-2019-000029 and transferred to the Competition Appeal Tribunal by the Order of Master Clark dated 21 January 2020 under CAT Case 1343/5/7/20 (T).

#### 1.7 *"Inner Confidentiality Ring Information"* means:

- (a) documents or information provided by a Party or Parties (the "disclosing Party") in these Proceedings, including any part of those documents and any information contained within those documents which:
  - the disclosing Party has designated as Inner Confidentiality Ring Information in accordance with paragraph 6 or paragraph 8 of this Order; or

- (ii) are designated as Inner Confidentiality Ring Information by the Tribunal;
- (b) documents such as:
  - working documents created by the receiving Party or its advisers or experts;
  - (ii) inter-partes correspondence;
  - (iii) documents filed at the Tribunal, such as pleadings, witness evidence, expert reports, skeleton arguments, applications and draft orders; and
  - (iv) transcripts prepared by a third party service provider,

which contain or refer to the content of the documents/information provided under (a), (c), or (d).

- (c) documents already disclosed by the Dawsongroup Claimants to the DS Smith Claimants pursuant to clause 23 (a) of the Order of the Tribunal dated 5-6 May 2021 given via the Defendants on the following dates: (i) 19 May 2021; 6 August 2021; and 24 August 2021 and designated as Inner Confidentiality Ring Information; and
- (d) documents already disclosed by the Ryder Claimants to the DS Smith Claimants pursuant to clause 23 (a) of the Order of the Tribunal dated 5-6 May 2021 given via the Defendants on 19 May 2021 and designated as Inner Confidentiality Ring Information.

For the avoidance of doubt, redacted versions of the documents described at (b) above are not Inner Confidentiality Ring Information if they have been redacted so that they no longer contain or refer to the content of the documents/information provided under (a).

#### 1.8 "Inner Confidentiality Ring Members" are:

- (a) those persons listed in Part A of the Schedule to this Order, as amended from time to time in accordance with the provisions of paragraph 5 below or an order of the Tribunal, who have given a signed undertaking in the terms of Part C of the Schedule to this Order and that signed undertaking has been provided to the Tribunal and (in the case of those persons who are added as Inner Confidentiality Ring Members in accordance with the provisions of paragraph 5 below) where the Proposing Party has complied with paragraph 5.3(b);
- (b) those persons listed in Part A of the Schedule to this Order, who have given a signed undertaking in the terms of Part C of the Schedule to the Confidentiality Ring Orders dated 18 December 2018, 12 June 2019, 30 March 2020, 4 December 2020, 22 July 2021 or 28 June 2022 in the Dawsongroup proceedings (as appropriate) and that signed undertaking has been provided to the Tribunal and (in the case of those persons who are added as Inner Confidentiality Ring Members in accordance with the provisions of paragraph 5 below) where the Proposing Party has complied with paragraph 5.3(b);
- (c) those persons listed in Part A of the Schedule to this Order, who have given a signed undertaking in the terms of Part C of the Schedule to the Confidentiality Ring Orders dated 31 July 2018, 18 December 2018, 12 June 2019, 30 March 2020 or 4 December 2020 in the Ryder proceedings (as appropriate) and that signed undertaking has been provided to the Tribunal and (in the case of those persons who are added as Inner Confidentiality Ring Members in accordance with the provisions of

paragraph 5 below) where the Proposing Party has complied with paragraph 5.3(b);

- (d) those persons listed in Part A of the Schedule to this Order who have given a signed undertaking in the terms of Part C of the Schedule to the Confidentiality Ring Orders dated 18 December 2020 or 22 July 2021 in the DS Smith proceedings;
- (e) necessary secretarial and other support personnel (not including trainee solicitors or paralegals) under the supervision of those persons identified in
   (a) (d) above, provided that such personnel have been informed of the confidential nature of the Confidential Information and the terms of Part C of the Schedule to this Order; and
- (f) any external eDisclosure or litigation support provider engaged by one of the Parties in connection with these Proceedings to provide eDisclosure or similar services in support of those persons identified in (a) –(d) above, who may have access to Inner Confidentiality Ring Information as a necessary consequence of the provision of their services and whose identity is notified in writing to the other Parties, provided that such provider has been informed of the confidential nature of the Confidential Information and the terms of Part C of the Schedule to this Order.
- 1.9 "Other Claimant" means any claimant in any of the Trucks Proceedings.
- 1.10 "*Non Defendant Addressees*" means any addressees of the Decision which are not parties to the Dawsongroup, Ryder or DS Smith Proceedings.

#### 1.11 "Outer Confidentiality Ring Information" means:

- (a) documents or information provided by a Party or Parties (the "disclosing Party") in these Proceedings, including any part of those documents and any information contained within those documents which:
  - the disclosing Party has designated as Outer Confidentiality Ring Information in accordance with paragraph 6 or paragraph 8 of this Order; or
  - (ii) are designated as Outer Confidentiality Ring Information by the Tribunal; and
- (b) documents such as:
  - working documents created by the receiving Party or its advisers or experts;
  - (ii) inter-partes correspondence;
  - (iii) documents filed at the Tribunal, such as pleadings, witness evidence, expert reports, skeleton arguments, applications and draft orders; and
  - (iv) transcripts prepared by a third party service provider,

which contain or refer to the content of the documents/information provided under (a).

For the avoidance of doubt, redacted versions of the documents described at (b) above are not Outer Confidentiality Ring Information if they have been redacted so that they no longer contain or refer to the content of the documents/information provided under (a).

#### 1.12 "Outer Confidentiality Ring Members" are:

- (a) Inner Confidentiality Ring Members; and
- (b) those persons listed in Part B of the Schedule to this Order, as amended from time to time in accordance with the provisions of paragraph 5 below or an order of the Tribunal, who have given a signed undertaking in the terms of Part D of the Schedule to this Order and that signed undertaking has been provided to the Tribunal and (in the case of those persons who are added as Outer Confidentiality Ring Members in accordance with the provisions of paragraph 5 below) where the Proposing Party has complied with paragraph 5.3(b);
- (c) those persons listed in Part B of the Schedule to this Order, who have given a signed undertaking in the terms of Part D of the Schedule to the Confidentiality Ring Orders dated 18 December 2018, 12 June 2019, 30 March 2020, 4 December 2020, 22 July 2021 or 28 June 2022 in the Dawsongroup proceedings (as appropriate), and that signed undertaking has been provided to the Tribunal and (in the case of those persons who are added as Outer Confidentiality Ring Members in accordance with the provisions of paragraph 5 below) where the Proposing Party has complied with paragraph 5.3(b);
- (d) those persons listed in Part B of the Schedule to this Order, who have given a signed undertaking in the terms of Part D of the Schedule to the Confidentiality Ring Orders dated 31 July 2018, 18 December 2018, 12 June 2019, 30 March 2020 or 4 December 2020 in the Ryder proceedings (as appropriate) and that signed undertaking has been provided to the Tribunal and (in the case of those persons who are added as Outer

Confidentiality Ring Members in accordance with the provisions of paragraph 5 below) where the Proposing Party has complied with paragraph 5.3(b);

- (e) those persons listed in Part B of the Schedule to this Order, who have given a signed undertaking in the terms of Part D of the Schedule to the Confidentiality Ring Orders dated 18 December 2020 or 22 July 2021 in the DS Smith proceedings;
- (f) necessary secretarial and other support personnel (not including trainee solicitors or paralegals) under the supervision of those persons identified in
   (b) (e) above, provided that such personnel have been informed of the confidential nature of the Confidential Information and the terms of Part D of the Schedule to this Order; and
- (g) any external eDisclosure or litigation support provider engaged by one of the Parties in connection with these Proceedings to provide eDisclosure or similar services in support of those persons identified in (b) – (e) above, who may have access to Outer Confidentiality Ring Information as a necessary consequence of the provision of their services and whose identity is notified in writing to the other Parties, provided that such provider has been informed of the confidential nature of the Confidential Information and the terms of Part D of the Schedule to this Order.
- 1.13 "Party" or "Parties" means a party to these Proceedings, including (for the avoidance of doubt) any Part 20 Defendants, the DS Smith Claimants and any former party to these Proceedings.
- 1.14 "*Ryder Proceedings*" means the claim filed in the Chancery Division of the High court of Justice by Ryder Limited and Hill Hire Limited under Claim No CP-2017-000022 and transferred to the Competition Appeal Tribunal by the Order of Mr Justice Roth dated 27 July 2018 under CAT Case 1291/5/7/18 (T).

- 1.15 "Scania" means Scania Aktiebolag, Scania CV Aktiebolag and Scania Deutschland GmbH.
- 1.16 *"these Proceedings"* means the Dawsongroup proceedings and/or the Ryder proceedings as applicable.
- 1.17 "*Trucks Proceedings*" means claims CAT Case 1292/5/7/18 (T) (Suez); CAT Case 1294/5/7/18 (T) (Wolseley); CAT Case 1284/5/7/18 (T) (Royal Mail); CAT Case 1290/5/7/18 (T) (BT); and/or CAT Case 1293/5/7/18 (T) (Veolia).

#### **INNER CONFIDENTIALITY RING INFORMATION**

2. Inner Confidentiality Ring Information provided in the context of the Dawsongroup proceedings and/or the Ryder proceedings is to be provided or made available solely to the Inner Confidentiality Ring Members, to be held by them on the terms set out in Part C of the Schedule to this Order, subject to the following paragraphs of this Order.

#### **OUTER CONFIDENTIALITY RING INFORMATION**

- 3. Outer Confidentiality Ring Information provided in the context of the Dawsongroup proceedings and/or the Ryder proceedings is to be provided or made available only to Outer Confidentiality Ring Members, to be held by them on the terms as set out in:
  - 3.1 if the individual is also an Inner Confidentiality Ring Member, Part C of the Schedule to this Order, subject to the following paragraphs of this Order;
  - 3.2 if the individual is not also an Inner Confidentiality Ring Member, Part D of the Schedule to this Order, subject to the following paragraphs of this Order.

#### **SCOPE OF THE ORDER**

- 4. For the avoidance of doubt, nothing in this Order or in its Schedule applies to documents and/or information received by a Party other than via the Dawsongroup proceedings and/or the Ryder proceedings under the terms of this Order.
  - 4.1 Any Inner Confidentiality Ring Member or Outer Confidentiality Ring Member may discuss any Confidential Commission Document with individuals having the same confidentiality status in the Trucks Proceedings, meaning an 'Inner Confidentiality Ring Member' or 'Outer Confidentiality Ring Member' (as applicable), as defined in the relevant confidentiality ring orders made in the Trucks Proceedings, provided the document(s) in question have/has also been disclosed in those proceedings. For the avoidance of doubt, in the case of documents of the nature described at 1.7(b) and 1.11(b):
    - (a) any parts of such documents that contain or refer to the content of Confidential Commission Documents that have not been disclosed in one or more of the Trucks Proceedings may not be discussed with Inner or Outer Confidentiality Ring Members in those proceedings; and
    - (b) any parts of such documents that contain or refer to the content of any Confidential Information that is not a Confidential Commission Document may not be discussed with any Inner or Outer Confidentiality Ring Members in any other proceedings.
  - 4.2 Any Inner Confidentiality Ring Member may discuss any Confidential Information with individuals having the same confidentiality status in the Trucks Proceedings, meaning an 'Inner Confidentiality Ring Member', as defined in the relevant confidentiality ring orders made in the Trucks Proceedings, provided that the Confidential Information in question is Common Disclosure in the relevant Trucks Proceedings. For the avoidance of doubt, in the case of documents of the nature described at 1.7(b) and 1.11(b), any parts of such documents that contain or refer

to the content of Confidential Information that is not Common Disclosure in the relevant Trucks Proceedings cannot be discussed with Inner Confidentiality Ring Members in those proceedings.

#### **ADDITIONS TO THE INNER OR OUTER CONFIDENTIALITY RING**

- 5. If a Party (the "*Proposing Party*") wishes to add an additional person as an Inner Confidentiality Ring Member or as an Outer Confidentiality Ring Member:
  - 5.1 it shall notify and request the express written consent of the other Parties, the Non Defendant Addressees and Scania (each a "*Receiving Party*" and together, the "*Receiving Parties*"), and when requesting such written consent specify the name and role of the proposed additional person and provide an explanation of why the addition is reasonable and necessary;
  - 5.2 following receipt of a notice pursuant to paragraph 5.1 above, a Receiving Party shall not unreasonably withhold or delay their consent and if any Receiving Party objects to the proposed addition to the Inner Confidentiality Ring or the Outer Confidentiality Ring, they shall notify the Proposing Party in writing within 7 days that they so object;
  - 5.3 if express consent is given by the Receiving Parties, or the Receiving Parties (or any of them) fail to give express consent and fail to give written notice of objection within the 7 day period specified in paragraph 5.2 above:
    - (a) the additional person will be required to give the written undertaking to the Tribunal in the terms of Part C or D (as appropriate) of the Schedule to this Order; and
    - (b) the Proposing Party concerned will provide the written undertaking referred to in paragraph 5.3(a) above and an amended version of Part A or B (as

appropriate) of the Schedule to this Order to the Tribunal and the other Parties;

- 5.4 if any objection referred to in paragraph 5.2 above is received, the Proposing Party may apply to the Tribunal and give notice of such application to the Receiving Parties.
- 5.5 If a Party wishes to remove a person as an Inner Confidentiality Ring Member or an Outer Confidentiality Ring Member, that Party will notify the other Parties and provide an amended version of Part A or B (as appropriate) of the Schedule to this Order to the Tribunal and the other Parties. The Party will also comply with paragraph 9.

#### DESIGNATION OF DOCUMENTS/INFORMATION OTHER THAN CONFIDENTIAL COMMISSION DOCUMENTS AND DECISION

- 6. Paragraphs 6.1 to and including 6.5 do not apply to Confidential Commission Documents or the Decision.
  - 6.1 A Party providing a document/information in connection with these Proceedings may designate that the document/information is: (i) Inner Confidentiality Ring Information; (ii) Outer Confidentiality Ring Information; or (iii) not confidential. Designations made to documents or information provided in connection with these Proceedings under Confidentiality Ring Orders previously made in these Proceedings stand as equivalent designations made under this Order.
  - 6.2 Designation of a document/information as Inner Confidentiality Ring Information or Outer Confidentiality Ring Information must be made in writing to the Parties receiving the document/information.
  - 6.3 A designation of not confidential means that the document/information is not Confidential Information.

- 6.4 Failure to provide a designation for a document/information at the time the document/information is provided shall be deemed to be a designation that the document/information in question is not confidential.
- 6.5 A Party receiving documents/information in these Proceedings (the "requesting Party") may request that the disclosing Party amend the designation of a document/information that it has provided (including amendment to a designation of not confidential), in which case:
  - (a) that requesting Party must provide a written request to the disclosing Party(copied to the other Parties) specifying the following:
    - (i) the relevant Confidential Information;
    - (ii) the designation the requesting Party believes is appropriate; and
    - (iii) why it is reasonable and necessary for the designation of the Confidential Information to be amended;
  - (b) the disclosing Party may consent in writing to amend the designation of Confidential Information, with such consent not to be unreasonably withheld and, in any event, a response should be provided within 14 days of having initially received the written request referred to at paragraph 6.5(a) above; and
  - (c) should the consent referred to in paragraph 6.5(b) above not be obtained, the requesting Party may apply to the Tribunal for an order that the Confidential Information should be designated as either: (i) Inner Confidentiality Ring Information (ii) Outer Confidentiality Ring Information; or (iii) not confidential (as the requesting Party deems appropriate), provided that notice is given of that application to the other Parties.

#### PROPOSED PROVISION OF CONFIDENTIAL INFORMATION TO PERSONS OUTSIDE THE RINGS

- 7. For the avoidance of doubt, nothing in this Order prevents a Party, its advisors or experts from sharing Confidential Information provided by that Party in these Proceedings.
  - 7.1 Nothing in this Order shall prevent:
    - (a) any Inner Confidentiality Ring Member from discussing Confidential Information with other inner confidentiality ring members in claims which the Tribunal has ordered are to be heard together with these Proceedings;
    - (b) any Outer Confidentiality Ring Member from discussing Outer Confidentiality Ring Information with other inner confidentiality ring members and outer confidentiality ring members in claims which the Tribunal has ordered are to be heard together with these Proceedings.
  - 7.2 A Party that receives Confidential Information in these Proceedings may request that:
    - (a) certain Confidential Information is to be provided or made available to one or more persons who are neither Inner Confidentiality Ring Members nor Outer Confidentiality Ring Members; and/or
    - (b) certain Inner Confidentiality Ring Information is to be provided or made available to one or more Outer Confidentiality Ring Members.
  - 7.3 If a Party wishes such Confidential Information to be provided or made available to such persons:
    - (a) it shall notify and request the express written consent of the other Parties and (in the case of a Confidential Commission Document) the Non

Defendant Addressees and Scania, and when requesting such written consent specify the name and role of the proposed person(s), the specific Confidential Information that is to be provided or made available to such person(s) (by reference to the relevant documents) and provide an explanation of why it is reasonable and necessary for the Confidential Information to be provided or made available to such person(s);

- (b) following receipt of a notice pursuant to paragraph 7.3(a) above, a recipient of any such notice shall not unreasonably withhold or delay their consent and if any such recipient objects to Confidential Information being provided or made available to the proposed person, they shall notify the requesting party in writing within 14 days that they so object;
- (c) if express consent is given by the recipient(s) of any notice under paragraph 7.3(a) or the recipient(s) (or any of them) fail to give express consent and fail to give written notice of objection within the 14 day period specified in paragraph 7.3(b) above:
  - (i) the additional person will be required to give the written undertaking to the Tribunal in the terms of Part C or D (as appropriate) of the Schedule to this Order, as amended to list the specific documents that are to be provided or made available to them; and
  - (ii) the party concerned will provide the written undertaking referred to in paragraph 7.3(c)(i) above to the Tribunal, other Parties, Non Defendant Addressees and Scania;
- 7.4 if any objection referred to in paragraph 7.3 above is received, the requesting Party may apply to the Tribunal and give notice of such application to the other Parties, the Non Defendant Addressees and Scania.

#### **DESIGNATION OF CONFIDENTIAL COMMISSION DOCUMENTS**

- 8. Subject to paragraphs 8.1 to 8.5 below, all Confidential Commission Documents disclosed in these Proceedings shall be deemed to be designated as Outer Confidentiality Ring Information from 4pm on the date at the end of the period provided for in paragraph 8.2 below and until such time shall be designated as Inner Confidentiality Ring Information.
  - 8.1 The Defendants, Non Defendant Addressees and/or Scania may request that a Confidential Commission Document be designated as Inner Confidentiality Ring Information as follows:
  - 8.2 By 4pm 28 days from the date of disclosure by list identifying the Confidential Commission Document to the Claimants, Defendants, Non Defendant Addressees and Scania,

the Defendant(s), Non Defendant Addressee(s) and/or Scania must provide a written request to the other Parties specifying the following:

- (a) the relevant Confidential Commission Document;
- (b) why it is reasonable and necessary for the Confidential Commission Document to be designated as Inner Confidentiality Ring Information.
- 8.3 The recipient of any such request may consent in writing to the requested designation of the relevant Confidential Commission Document; with such consent not to be unreasonably withheld and, in any event, a response should be provided within 28 days of having initially received the written request referred to at paragraph 8.2 above. In the event that no response is provided by any of the other Parties within 28 days, the relevant Confidential Commission Document shall be designated as Inner Confidentiality Ring Information. The Claimants will, however, remain able to seek designation of any Confidential Commission

Document as Outer Confidentiality Ring Information (or as not confidential) at any time pursuant to paragraph 8.6 below.

- 8.4 Should the consent referred to in paragraph 8.3 above not be obtained, the Defendant(s), Non Defendant Addressees and/or Scania may within 21 days of being notified of consent not being provided apply to the Tribunal for an order that the Confidential Commission Document should be designated as Inner Confidentiality Ring Information, provided that notice of that application is given to the other Parties.
- 8.5 Pending the outcome of this process in relation to requests made pursuant to paragraphs 8.1 to 8.4 above, the Claimants shall treat the relevant Confidential Commission Document as Inner Confidentiality Ring Information.
- 8.6 The Claimants may request that the designation of a Confidential Commission Document be amended from Inner Confidentiality Ring Information to Outer Confidentiality Ring Information, or from Outer Confidentiality Ring Information to not confidential as follows:
  - (a) the Claimants must provide a written request to the Defendants, the Non Defendant Addressees, and Scania specifying the following:
    - (i) the relevant Confidential Commission Document;
    - (ii) why it is reasonable and necessary for the designation of the Confidential Commission Document to be amended;
  - (b) after receipt of a request under paragraph 8.6(a) above, the Defendants, the Non Defendant Addressees and/or Scania may consent in writing to amend the designation of the Confidential Commission Document, with such consent not to be unreasonably withheld and, in any event, a response

should be provided within 28 days of having initially received the written request referred to at paragraph 8.6(a) above;

- (c) in the event that any of the Defendants, Non Defendant Addressees and/or Scania do not respond to the written request referred to at paragraph 8.6(a) above within 28 days of the request being sent, the relevant Defendant, Non Defendant Addressee or Scania shall be deemed to consent to the amendment to the designation of the relevant Confidential Commission Document sought by the Claimants; and
- (d) should the consent referred to in paragraph 8.6(b) above not be obtained, the Claimants may apply to the Tribunal for an order that the relevant Confidential Commission Document should be designated as Outer Confidentiality Ring Information or not confidential, provided that notice is given of that application to the other Parties, Non Defendant Addressees, and Scania.
- 8.7 The Defendants shall indicate in writing that they are disclosing Confidential Commission Documents. Failure to comply with this paragraph does not alter the deemed designation of Confidential Commission Documents in accordance with this paragraph 8.

#### **DESIGNATION OF DECISION**

8.8 The Decision shall be deemed to be designated Outer Confidentiality Ring Information.

#### **COPIES OF CONFIDENTIAL INFORMATION**

9. Subject to the exceptions in paragraph 9.1 below, copies of Confidential Information provided pursuant to this Order (in both hard and soft copy) must be destroyed or made inaccessible at the conclusion of these Proceedings, or when an individual ceases to be

involved in these Proceedings. Each Party shall notify the other Parties, the Non Defendant Addressees and Scania that the Confidential Information has been destroyed or made inaccessible (as appropriate).

- 9.1 The obligation in paragraph 9 above, is subject to the following exceptions:
  - (a) Paragraph 9 does not apply to solicitors' or counsel's notes.
  - (b) Paragraph 9 does not create an obligation to search for transitory or deeply stored soft copies of Confidential Information which may exist on the computer system of the receiving Party and which cannot be recovered without special measures, provided that such documents and/or information will be promptly deleted in the event of the restoration of such copies.
  - (c) Paragraph 9 does not apply to Parties' copies of pleadings, evidence, skeleton arguments, transcripts, applications, draft orders, correspondence referred to at trial or in a hearing or submitted in the proceedings, as well as lawyer work product referring to Confidential Information, subject to continued compliance with the terms of this Order in respect of the Confidential Information contained within such documents.
  - (d) Paragraph 9 does not apply to a Party in respect of the Confidential Information it provided.

#### **UNAUTHORISED DISCLOSURE OF CONFIDENTIAL INFORMATION**

10. In the event of any disclosure of Confidential Information other than in a manner authorised by this Order, including any unintentional or inadvertent disclosure, lawyers for the improperly disclosing Party shall immediately notify the improper recipient(s) and the lawyers for the Party or Parties who provided the Confidential Information in these Proceedings, and (in the case of a Confidential Commission Document) the Non Defendant Addressees and Scania, of all the pertinent facts, and the improperly disclosing Party shall use its best endeavours to further prevent unauthorised disclosure including retrieving all copies of the Confidential Information from the improper recipient(s) thereof and securing the agreement of such recipient(s) not to further disseminate the Confidential Information in any form.

#### **DISCLOSURE PURSUANT TO COURT ORDER**

If at any time any Confidential Information is made the subject of a court disclosure or 11. discovery order (or similar) anywhere in the world, the person upon whom the order is served shall immediately give written notice to the legal representatives of the Party or Parties which produced the Confidential Information, together with (in the case of the Decision or a Confidential Commission Document) the Non Defendant Addressees and Scania. If the Party which provided the Confidential Information in these Proceedings (or the relevant Non Defendant Addressee(s) or Scania in the case of a Confidential Commission Document) does not take steps to prevent the further disclosure of such Confidential Information within ten days of the date on which such written notice was given, the Party against whom the order was made may produce such Confidential Information but shall take all reasonable measures to have the Confidential Information treated in accordance with the terms of this Order. For the avoidance of doubt, this paragraph only applies to a Party who is the recipient of Confidential Information provided in these Proceedings and does not apply to the Party which provides the Confidential Information in these Proceedings.

#### **ENFORCEMENT OF THE ORDER, LIBERTY TO APPLY AND COSTS**

- 12. In the event of any anticipated or actual breach of this Order, any Party, and any of the Non Defendant Addressees and/or Scania may seek to enforce the terms of this Order.
- There shall be liberty to apply, which shall be on notice to the other Parties, the Non Defendant Addressees and Scania.
- 14. The costs of compliance with and of drafting this Order shall be costs in the case.

#### **NOTICES**

- Any notice, consent or objection to be given under or in connection with this Order (each a "*Notice*" for the purposes of this paragraph) shall be in writing.
  - 15.1 Service of a Notice must be effected by email and, in the case of Notice to the Defendants, with a hard copy to follow by post to Travers Smith LLP, 10 Snow Hill, London EC1A 2AL (Ref. D.4377.6/CFE), Macfarlanes LLP, 20 Cursitor Street, London EC4A 1LT (Ref. CAFF/SJXD/680318) and Freshfields Bruckhaus Deringer LLP, 100 Bishopsgate, London EC2P 2SR (Ref. 168213.0001 BCT/NJF).
  - 15.2 Notices shall be addressed as follows:

(b)

(a) Notices for the Dawsongroup Claimants shall be marked for the attention of:

	Email addresses:	DG.Trucks@bclplaw.com
		Andrew.Hockley@bclplaw.com
		Edward.Coulson@bclplaw.com
	Reference:	AHOC/ECSN/38963.00005
I	Notices for the Ryder	Claimants shall be marked for the attention of:
	Email addresses:	euan.burrows@ashurst.com
		max.strasberg@ashurst.com
		angus.rance@ashurst.com
	Reference:	EUB/JRL/MSTRAS/1000.008.905

- (c) Notices to the DS Smith Claimants shall be marked for the attention of:Email address: emma.birch@fieldfisher.com
- (d) Notices for the Defendants shall be marked for the attention of:

First to Fourth Defendants in the Dawsongroup proceedings / Seventeenth to Twentieth Defendants in the Ryder proceedings (DAF)

Email address:	DafTrucksconfidentiality@traverssmith.com
Reference:	Ref. D.4377.6/CFE

Seventh to Eleventh Defendants in the Dawsongroup proceedings (Volvo/Renault)

Email address: \$VRT\_Trucks\_UK\_Confidentiality@freshfields.com

Reference: 168213-0001 BCT/NF

Fifth to Sixth Defendants in the Dawsongroup proceedings / Tenth to Thirteenth Defendants in the Ryder proceedings (Mercedes/Daimler)

Email address: MacfarlanesTrucksConfidentiality@macfarlanes.com

Reference: 168213-0001 BCT/NF

(e) Notices for the Non Defendant Addressees shall be sent to:

#### MAN:

 $Email\ address:\ \ SM\_MANTrucksConfidentiality@SlaughterandMay.com$ 

Reference: DMT/HEW/NUA

#### IVECO:

Email address: IvecoUKConfidentialityNotification@hsf.com

Reference: 30991611/4168/9100/11090

Kim.Dietzel@hsf.com

(f) Notices for <u>Scania</u> shall be marked for the attention of:

Email addresses: scaniatrucksukconfidentiality@allenovery.com

Andrew Lenon KC Chair of the Competition Appeal Tribunal Made: 14 November 2022 Drawn: 14 November 2022 This part contains the names of Inner Confidentiality Ring Members:

#### PART A

#### **Dawsongroup** Claimants

#### Bryan Cave Leighton Paisner LLP

Ed Coulson, Partner (added by inclusion in the Confidentiality Order of 18 December 2018)

Andrew Hockley, Partner (added by inclusion in the Confidentiality Order of 18 December 2018)

Ben Blacklock, Senior Associate (added by inclusion in the Confidentiality Order of 18 December 2018)

Clare Reeve, Senior Associate (added by inclusion in the Confidentiality Order of 18 December 2018)

Andrew Leitch, Senior Associate (added by inclusion in the Confidentiality Order of 18 December 2018)

Nicholas Young, Senior Associate (added by inclusion in the Confidentiality Order of 18 December 2018)

Graeme Thomas, Senior Associate (added by inclusion in the Confidentiality Order of 18 December 2018)

Alexandra Hildyard, Senior Associate (added on 4 July 2019)

Sam Brown, Associate (added by inclusion in the Confidentiality Order of 18 December 2018)

India Fahy, Associate (added by inclusion in the Confidentiality Order of 18 December 2018)

Thomas Wright, Associate (added on 22 November 2019)

Daniel Swinburn, Senior Paralegal (added by inclusion in the Confidentiality Order of 18 December 2018)

George Christodoulides, Associate (added on 1 March 2021)

Katharina Jungclaussen, Trainee Solicitor (added on 27 August 2021)

Natasha Warby, Trainee Solicitor (added on 27 August 2021)

Charlotte Scott, Trainee Solicitor (added on 9 September 2021)

Luke Hardingham, Associate (added on 25 January 2022)

Nazia Sohail, Trainee Solicitor (added on 25 January 2022)

Lucie Lavergne, Trainee Solicitor (added on 25 January 2022)

Max Dixon, Trainee Solicitor (added on 3 March 2022)

Irina Tuca, Trainee Solicitor (added on 3 March 2022)

Kwabena Boateng, Trainee Solicitor (added on 29 April 2022) Sosseh Njie, Trainee Solicitor (added 30 August 2022) Tyler Felix, Trainee Solicitor (added 30 August 2022) Ben Bolderson, Associate (added on 24 October 2022)

#### Monckton Chambers

Tim Ward QC (added by inclusion in the Confidentiality Order of 18 December 2018) Robert Palmer QC (added by inclusion in the Confidentiality Order of 18 December 2018) Anneliese Blackwood (added by inclusion in the Confidentiality Order of 18 December 2018) Will Hooper (added on 29 July 2022) Ben Lask (added on 28 December 2018) Ligia Osepciu (added on 29 January 2021) Clíodhna Kelleher (added 27 October 2021) Alison Berridge (added on 5 July 2022)

#### Economic Insight

James Harvey, Director (added by inclusion in the Confidentiality Order of 18 December 2018)

Christopher Pickard, Senior Consultant (added by inclusion in the Confidentiality Order of 18 December 2018)

Madeleine Matos, Consultant (added by inclusion in the Confidentiality Order of 18 December 2018)

Eleanor Clutterbuck, Analyst (added by inclusion in the Confidentiality Order of 18 December 2018)

Khaldia Al Kasm, Analyst (added by inclusion in the Confidentiality Order of 18 December 2018)

Sarah Barker, Analyst (added on 8 April 2019)

Alasdair Crookes, Analyst (added on 8 April 2019)

Anthony Zhang, Analyst (added on 18 October 2019)

Marie Kraihammer, Analyst (added on 18 October 2019)

Kyran Stewart, Analyst (added on 18 October 2019)

Penelope Banks, Analyst (added on 21 October 2019)

David Sookias, Analyst (added on 22 May 2020)

Thomas Elder, Analyst (added 29 January 2021)

Natalie Luyt, Analyst (added 29 January 2021)

Sam Williams, Director (added 10 March 2022)

Ian Thompson, Associate Director (added 10 March 2022)

William Ward, Analyst (added 10 March 2022)

Loy Chen, Consultant (added 10 March 2022)

#### <u>Ankura</u>

Gary Davies, Senior Managing Director (added 11 April 2022) James Southwell, Director (added 11 April 2022) Kit Moreton, Senior Associate (added 11 April 2022) Zakariya Khan, Intern (added on 11 July 2022) Anna Baird, Director (added 9 September 2022) Mallika Rau, Senior Associate (added 9 September 2022) Adrian Martin, Managing Director (added 30 September 2022) Kurun Bhandari, Director (added 30 September 2022) Charli Kay-Burridge, Associate (added 17 October 2022)

<u>Grant Thornton UK LLP</u> Sean Mitchell, Director (added 11 April 2022) Robin Greenwood, Associate Director (added 11 April 2022) Becca Jolley, Tax Associate (added 11 April 2022)

<u>Blackstone Chambers</u> Hanif Mussa QC (added on 5 July 2022) Tom Coates (added on 5 July 2022)

#### **Ryder Claimants**

Ashurst LLP James Levy, Partner (added 31 July 2018) Euan Burrows, Partner (added 31 July 2018) Tom Connor, Partner (added 31 July 2018) Max Strasberg, Associate (added 31 July 2018) Nadja Waksman, Solicitor (added 31 July 2018) Angus Rance, Solicitor (added 31 July 2018) David Wirth, Competition Economist (added 6 September 2018) Tom Punton, Competition Economist (added 6 September 2018) Emile Abdul-Wahab, Solicitor (added 6 September 2018) Ute Zinsmeister, Partner (added 9 October 2018) Maria Held, Counsel (added 9 October 2018) Franziska Sauer, Associate (added 9 October 2018) Annick Vroninks, Partner (added 23 October 2018) Irene Antypas, Counsel (added 23 October 2018) Rafael Baena, Partner (added 24 October 2018) Javier Torrecilla, Senior Associate (added 24 October 2018) Melissa Sibley, Paralegal (added 9 November 2018) Patrick Holland, Legal Analyst (added 10 December 2018) (removed 29 September 2020) (readded 10 March 2021) India Case, Solicitor (added 12 December 2018) Aneesa Khan, Solicitor (added 27 March 2019) Logan Mair, Partner (added 3 April 2019) Clare Hennessey, Associate (added 3 April 2019) Simon Bromwich, Partner (added 23 April 2019) Peter Turner-Kerr, Counsel (added 20 May 2019) Brooke Moon, Solicitor Apprentice (added 21 October 2019) Oliver Noble, Competition Economist (added 23 October 2019) Jack Burnett, Solicitor (added 26 February 2020) Zac Davies, Associate (Added 31.03.2020) Victoria Beswick, Solicitor (added 03 April 2020) Harriet Martin, Solicitor (added 03 April 2020) Imogen Chitty, Solicitor (added 22 September 2020) Katy Walters, Solicitor (added 22 September 2020) Jon Gale, Partner (added 05 October 2020) Nathan Lindsay, Senior Associate (added 23 October 2020) Tim West, Partner (added 26 October 2020) Hayden Dunnett, Solicitor (added 1 March 2021) Mhairi Airlie, Legal Analyst (added 10 March 2021) Jasmine Tiong, Trainee Solicitor (added 16 March 2021) Melissa Black, Legal Analyst (added 21 June 2021) Mhairi Innes, Legal Analyst (added 21 June 2021)

Kirsty McKay, Legal Analyst (added 20 August 2021) Rubaina Sehgal, Associate (added 15 September 2021) Justin Browne, Associate (added 15 September 2021) Florence Chan, Trainee Solicitor (added 16 September 2021) George Booth-Clibborn, Trainee Solicitor (added 16 September 2021) Louisa Northover, Solicitor (added 4 November 2021) Jack Haile, Competition Economist (added 16 November 2021) Nicholas Polycandriotis Van Duynhoven, Legal Analyst (added 23 November 2021) Zainab Kuku, Trainee Solicitor (added 18 March 2022) Jie Hao Tang, Trainee Solicitor (added 18 March 2022) Sam Bloor, Legal Analyst (added 28 April 2022) Lewis Johnston, Legal Analyst (added 27 July 2022) Anjali Vaz, Trainee Solicitor (added 14 September 2022) Marisa Muramatsu, Trainee Solicitor (added 14 September 2022) Harry Crabtree, Trainee Solicitor (added 16 September 2022) Laura Dunn, Trainee Solicitor (added 16 September 2022) Patrick Chambers, Trainee Solicitor (added 16 September 2022)

#### Monckton Chambers

Mark Brealey QC (added 31 July 2018) Fiona Banks (added 4 January 2019) Josh Holmes QC (added 27 December 2019) Dr Antonia Fitzpatrick (added 6 October 2021)

<u>One Essex Court</u> Derek Spitz (added 31 July 2018)

#### NERA Economic Consulting

Dr Lawrence Wu (added 31 July 2018) Grant Saggers (added 31 July 2018) Dr Anca Cojoc (added 31 July 2018) Ming Hon Wong (added 31 July 2018) Sergio Garcia de Frutos (added 26 September 2018) Huy Dang (added 26 September 2018) Lionel Gendebien (added 15 July 2019) Garrett Glasgow (added 20 November 2019) Daniel Sullivan (added 20 November 2019) Dr Gabriella Monahova (added 16 June 2021) Dr Cristián Hernández (added 16 June 2021) Dr Alexandre Carbonnel (added 16 June 2021) Francesca Amore (added 16 June 2021) Alisa Smaghina (added 16 June 2021) James Thomas (added 16 June 2021) Hamza Shoaib (added 16 June 2021) Daniel Hanson (added 17 November 2021) Dr. Tuba Toru Delibasi (added 17 November 2021) Tanya Narang (added 17 November 2021) Hank Snowdon (added 17 November 2021) Matthew Yorkilous (added 17 November 2021) Francis Ostermeijer (added 17 November 2021) Khalil Sabourian (added 17 November 2021) David Liedig, Research Officer (added 30 September 2022) Lei (Daisy) Chu, Research Officer (added 30 September 2022)

OnPoint Analytics, Inc.

John Connor, Senior Consultant (added 5 March 2019)

Gareth Macartney, Senior Economist (added 5 March 2019) George Saioc, Economist (added 5 March 2019) Chandra Wallace, Associate (added 5 March 2019) Dawna Lewski, Associate (added 5 March 2019) Radostin Ivanov, Research Analyst (added 5 March 2019) Thao Nguyen, Research Analyst (added 5 March 2019)

Kroll Advisory Limited Haberman Ilett UK Limited

Frank Ilett, Partner (added 11 June 2019) Bruno Augustin, Partner (added 11 June 2019) Aaron Bradley, Senior Manager (added 11 June 2019) Alex Hewson, Consultant (added 11 June 2019) Becky House, Consultant (added 11 June 2019) Matthew Karssiens, Consultant (added 08 October 2019) Sijeenth Sivalingham, Senior associate (added 28 July 2021) Matthew Adamson, Senior associate (added 5 January 2022) Ronke Ajayi, Senior associate (added 20 May 2022) David Oni, Senior associate (added 8 June 2022) Debbie Revill, Managing Director (added 19 July 2022) Reece Jackson-Jones, Manager (added 19 July 2022) Joe Lee, Manager (added 19 July 2022) Philip Haberman, Managing Director (added 27 July 2022) Andy Murray (added 2 August 2022) Mark Strafford, Senior Manager (added 22 August 2022) Jonny Davies, Senior Manager (added 22 August 2022) Kevin Davey, Senior Manager (added 22 August 2022), Alina Serdjukova, Manager (added 22 August 2022) Jenny Shenton, Senior Associate (added 22 August 2022)

Rosalind Page, Manager (added 22 August 2022) Theodora Mavromati, Vice President (added 23 August 2022) Wing Tse, Director (added 23 August 2022) Tom Barak, Senior Associate (added 1 September 2022) Ryan Austin, Analyst (added 21 September 2022) Tony Mauritz, Senior Manager (added 30 September 2022) Gary King, Senior Manager (added 30 September 2022) Edward Martin, Director (added 30 September 2022) Raj Heer, Vice President (added 4 November 2022)

#### **DS Smith Claimants**

Fieldfisher LLP Ellie Pinnells, Partner (added 5 January 2021) David Kaluwahandi, Associate (added 5 January 2021) Emma Freudenthal, Associate (added 5 January 2021) Ryan Hughes, Associate (added 5 January 2021) Mila Kovalenko, Associate (added 5 January 2021) Anita Panchal, Risk and Liability Team Manager (added 5 January 2021) Siobhan Deeming, Solicitor Apprentice (added 5 January 2021) Maximillian Häger, Trainee lawyer (added 1 March 2021) Leo McSweeney, Senior Legal Professional (added 11 February 2021) Laurent van der Bruggen, Paralegal (added 1 March 2021) Esther Thomas, Trainee Solicitor (added 2 March 2021) Kerri Wilson, Senior Associate (added 8 April 2021) Sarah McVeigh, Legal Professional (added 10 August 2021) Yin Yee Ng, Solicitor (added 9 September 2021) Eilish Beeby, Trainee Solicitor (added 9 September 2021) Liam Agnew, Legal Professional (added 20 October 2021)

Aoife Bourdet, Legal Professional (added 20 October 2021) Christopher McQueenie, Graduate Legal Professional (added 20 October 2021) Emma Birch, Senior Associate (added 22 November 2021) Grace Brown, Associate (added 28 February 2022) Alexandra Kalu, Trainee Solicitor (added 28 February 2022) Lawrence Accardi, Solicitor (added 10 June 2022) Sinead Thomasson, Trainee Solicitor (added 7 September 2022)

## Brick Court Chambers

Robert O'Donoghue QC (added 5 January 2021)

<u>Monckton Chambers</u> Julian Gregory (added 5 January 2021) Khatija Hafesji (added 5 January 2021)

Case Associates

Dr. Cento Veljanovski, Managing Partner (added 5 January 2021)

## Grant Thornton

Michael Barber, Associate Director (added 6 January 2021) Edward J Harber, Manager (added 6 January 2021) Charlotte McAuslan, Manager (added 6 January 2021) Robert Soady, Manager (added 6 January 2021) Nick Wood, Partner (added 20 January 2021) Michael Radcliffe, Partner (added 20 January 2021) Amelia Rogers, Assistant Manager (added 20 January 2021) Nilesh Mehta, Assistant Manager (added 20 January 2021) Sara Jackson, Assistant Manager (added 20 January 2021) Manish Chudasama, Associate (added 20 December 2021) Kayleigh Glanvill, Assistant Manager (added 20 December 2021) Poonam Doorga, Associate Director (added 1 March 2022) Kyriakos Christodoulides, Manager (added 1 March 2022)

# First to Fourth Defendants in the Dawsongroup proceedings and Seventeenth to Twentieth Defendants in the Ryder Proceedings (DAF)

## Travers Smith LLP

Caroline Edwards, Partner (added 30 January 2019) Anne Foster, Consultant (added 30 January 2019) Rachel Wilson, Senior Counsel (added 30 January 2019) Joseph Moore, Senior Associate (added 30 January 2019) James Hulmes, Senior Associate (added 30 January 2019) Edward Hardman, Senior Associate (added 30 January 2019) Philippe Lopeman, Associate (added 30 January 2019) Tim Knight, Senior Associate (added 13 February 2019) Lauren Clark-Hughes, Associate (added 8 February 2019) Michelle Anderson, Legal Operations Manager (added 30 January 2019) Charlotte Angwin, Senior Associate (added 30 January 2019) Huw Jenkin, Partner (added 30 January 2019) Laura McCann, Senior Associate (added 30 January 2019) Thomas Caldwell, Senior Associate (added 30 January 2019) Maya Chandegra, Associate (added 30 January 2019) Cormac Toomey, Senior Associate (added 06 March 2019) Imogen Nolan, Senior Associate (added 06 March 2019) Adam Short, Senior Counsel (added 10 July 2019) Madeleine Parker, Associate (added 25 August 2020) Harriet Lawrence, Associate (added 15 September 2020) Francesca Lawrenson, Associate (added 15 September 2020)

Adam Bristow, Senior Associate (added 12 January 2021) Jarrai Jawara, Associate (added 29 January 2021) Lucy Clifford, Associate (added 29 January 2021) Lucy Alexander, Associate (added 29 January 2021) Anna Rostron, Associate (added 29 January 2021) Adam Bradley, Senior Associate (added 24 February 2021) Emma Gittings, Associate (added 26 February 2021) Manasa Shanker, Associate (added 23 March 2021) Alyce Lynch, Senior Associate (added 23 March 2021) Rianna Ragbir, Paralegal (added 30 June 2021) Andrew Pullar, Senior Associate (added 20 July 2021) Barnaby Stannard, Partner (added 26 July 2021) Peter Smith, Associate (added 25 August 2021) Sian Whitby, Associate (added 3 September 2021) Alfred Fabian, Associate (added 3 September 2021) Annabelle Atkins, Associate (added 20 September 2021) Sama Aunallah, Paralegal (added 20 September 2021) Samuel Lobo, Paralegal (added 20 September 2021) Eleanor Hyde, Paralegal (added 24 January 2022) Charlie Brook, Paralegal (added 22 February 2022) Kasope Sonola, Trainee Solicitor Associate (added 1 March 2022) Michele Cheng, Senior Associate (added 5 April 2022) Orlagh Joyce, Associate (added 5 April 2022) Grace Panter, Associate (added 5 April 2022) Denise Kellner, Paralegal (added 12 April 2022) Alice Stephen, Trainee Solicitor (added 5 September 2022) Will Legood, Trainee Solicitor (added 5 September 2022) George Fox, Trainee Solicitor (added 5 September 2022)

Clara Grinyer, Paralegal (added 13 September 2022) Bernie Rivard, Trainee Solicitor (added 13 September 2022) Greta Tozer, Trainee Solicitor (added 13 September 2022) Mohammad Ali, Trainee Solicitor (added 13 September 2022) James Barrett, Legal Project Manager (added 13 September 2022) Maya Patel, Paralegal (added 3 October 2022) Jack Congdon, Associate (added 3 October 2022) Katherine Barrett, Associate (added 31 October 2022) Sara Meredith, Senior Associate (added 11 November 2022) Alyssa Brathwaite, Senior Associate (added 11 November 2022) Eleanor McCann, Associate (added 11 November 2022) Christian Greenhill-Hooper, Associate (added 11 November 2022)

## Monckton Chambers

Daniel Beard QC (added 1 May 2019) Meredith Pickford QC (added 6 March 2019) Rob Williams QC (added 7 March 2019) Nikolaus Grubeck (added 13 February 2019) Daisy Mackersie (added 6 March 2019) James Bourke (added 13 February 2019) David Gregory (added 1 May 2019) Thomas Sebastian (added 2 May 2019) Azeem Suterwalla (added 22 July 2019)

## Compass Lexecon

Damien Neven, Senior Consultant (added 23 May 2019) Enrique Andreu, Senior Vice President (added 15 March 2019) Julian Delamer, Senior Vice President (added 29 March 2019) Roberto Venturini, Economist (added 13 February 2019) Vladimir Tsimaylo, Senior Analyst (added 29 March 2019) Marcin Pruski, Economist (added 6 March 2019) Daniel Westrik, Economist (added 23 May 2019) Laura Napolitano, Analyst (added 13 February 2019) Laureen de Barsy, Analyst (added 13 February 2019) Daniel Coublucq, Vice President (added 14 October 2019) Benjamin Roux, Vice President (added 15 January 2021) Hyung-Joong Kim, Senior Economist (added 15 January 2021) Valerio Serse, Economist (added 15 January 2021) Andrea Brucato, Senior Analyst (added 15 January 2021) Antoine Tonnerre, Senior Economist (added 15 January 2021) Povilas Bakas, Senior Analyst (added 15 January 2021) Sam Carless, Senior Analyst (added 15 January 2021) Jesús Carro, Associate Professor (added 15 January 2021) Gianmarco Calanchi, Senior Economist (added 28 April 2021) Jacob Horne, Analyst (added 10 May 2021) Alessia Paulicelli, Senior Analyst (added 30 June 2021) Ethan Soo, Associate Data Scientist (added 8 July 2021) Alina Rymar, Analyst (added 19 July 2021) Hannah Jantsch, Analyst (added 19 July 2021) Jiajun Wei, Analyst (added 19 July 2021) Scott Holbrook, Vice President (added 23 July 2021) Isabel Bartmann, Analyst (added 25 August 2021) Laura Ashirepbay, Analyst (added 21 September 2021) Georges Siotis, Affiliate Consultant (added 18 October 2021) Mark Choo, Senior Analyst (added 18 October 2021) Julieta Fridland, Senior Analyst (added 18 October 2021)

Alexander Wolf, Economist (added 10 December 2021) Bartosz Redlicki, Economist (added 10 December 2021) Giulia Pavan, Economist (added 10 December 2021) Johannes Odenkirchen, Economist (added 10 December 2021) Mai Nguyen, Economist (added 10 December 2021) Maria Friese, Economist (added 10 December 2021) Richard Kamp, Senior Analyst (added 10 December 2021) Stephen Feith, Senior Analyst (added 14 December 2021) Anir Yassine Eddarifi, Senior Analyst (added 17 December 2021) Christopher Gibson, Economist (added 17 December 2021) Stefan Bergheimer, Senior Analyst (added 2 February 2022) Janis Seiter, Analyst, (added 2 February 2022) Max Mirtschink, Analyst (added 2 February 2022) Urs Haegler, Senior Vice President (added 2 February 2022) Luke Gardner, Senior Analyst (added 23 March 2022) Jad Benmoussa, Analyst (added 19 April 2022) Caterina Marchili, Analyst (added 19 April 2022) Juliana Lopez, Senior Analyst (added 16 June 2022) Maximilian Dreher, Analyst (added 16 June 2022) Raphaëlle Vinches, Intern (added 16 June 2022) Catalina Campillo, Vice President (added 05 July 2022) Giulia Campagna, Analyst (added 11 July 2022) Pietro Aletti, Analyst (added 11 July 2022) David Galindo Peinado, Research Analyst (added 12 October 2022) Pamela Ferroni, Analyst (added 12 October 2022) Baptiste Souillard, Senior Analyst (added 19 October 2022) Jan-Torben Fricke, Intern (added 9 November 2022)

## FTI Consulting

Mark Bezant, Senior Managing Director (added 19 June 2019) Timothy Warren, Managing Director (added 19 June 2019) Joel Franks, Senior Director (added 30 January 2020) Aaron Roberts, Senior Consultant (added 18 February 2020) Anushana Shukla, Consultant (added 18 February 2020) James McKelvie, Consultant (added 18 February 2020) Jun Yin Shik, Consultant (added 18 February 2020) Ye Zhang, Consultant (added 18 February 2020) Jonathan Bradshaw, Director (added 19 March 2021) Jack Hughes, Consultant (added 6 April 2021) Jieh Sun Liew, Consultant (added 28 April 2021) Ravi Nathwani, Consultant (added 28 April 2021) Song-ee Kim, Director (added 18 June 2021) Charlie Colthorpe, Consultant (added 20 September 2021) Archie Standing, Senior Consultant (added 20 September 2021) James Burford, Consultant (added 20 September 2021) Robert Boswall, Consultant (added 21 September 2021) Rebekah Cubie, Consultant (added 19 October 2021) Tim Riley, Consultant (added 28 October 2021)

De Brauw Blackstone Westbroek N.V.

Jolling de Pree, Partner (added 15 February 2019) Machteld de Monchy, Partner (added 15 February 2019) Tilly Alberga-Smits, Senior Associate (added 6 March 2019) Kees Saarloos, Senior Associate (added 15 February 2019) Zeynep Ortac, Senior Associate (added 15 February 2019) Georgiana Mirza, Associate (added 15 February 2019) Vivian van Weperen, Associate (added 23 May 2019) Paul Post, Associate (added on 15 February 2019) Tiana Danielle Xavier, Associate (added 15 February 2019) Mira Smulders, Senior Associate, (added 15 February 2019) Tim van den Meijdenberg, Associate (added 15 February 2019) Aylin Gayibli, Associate (added 1 March 2019) Agnieszka Bartlomiejczyk, Associate (added 12 April 2019) Justyna Niemczyk, Associate (added 12 April 2019) James Wang, Senior Associate (added 24 May 2019) Iuliia Samsonova, Associate (added 28 June 2019) Laura de Vries, Associate (added 28 June 2019) Judy Jordaan-Byrne, Contract Lawyer (added 10 October 2019) Angelique Groen-Boon, Senior Associate (added 30 January 2020) Cameron Mills, Senior Associate (added 17 March 2020) Alexandru Baltag, Associate (added 16 June 2020) Andrey Birg, Associate (added 25 September 2020) Lydia Aylett, Associate (added 25 September 2020) Valentina Rosca, Associate (added 22 January 2021) Alasdair Tyrrell, Contract Lawyer (added 23 July 2021) Anna John, Associate (added 29 July 2021) Oedse Stienstra, Law Assistant (added 12 August 2021) Francesco Bassi, Associate (added 12 October 2021) Stephanie The, Partner (added 3 December 2021) Thomas Knox, Senior Associate (added 9 March 2022) Ahmad Hamzeh, Associate (added 9 November 2022)

Brick Court Chambers

Sarah Love, Barrister (added 6 December 2021)

## AlixPartners LLP

Jan Folke Wülfers, Vice President (added 24 May 2022)

# <u>Seventh to Eleventh Defendants in the Dawsongroup proceedings and Fifth to Ninth</u> Defendants in the Ryder proceedings (Volvo/Renault)

Freshfields Bruckhaus Deringer LLP

Bea Tormey, Partner

Nicholas Frey, Partner

Ricky Versteeg, Partner

Daniel Hunt, Senior Associate

Angus Reston, Senior Associate

Haris Ismail, Associate

Johanna McDavitt, Associate

Alexandra Holroyd, Associate (added 9 January 2019)

Gavin Burke, Senior Paralegal

Megan McDonagh, Senior Paralegal

Xander Friedlaender, Associate (added 4 April 2019)

Natalie Keir, Associate (added 4 April 2019)

Nouné Padarian, Paralegal (added 24 June 2019)

Charlotte Best, Associate (added 09 October 2019)

Adrian Wright, Associate (added 09 October 2019)

Campbell Herbert, Associate (added 25 October 2019)

Paul Abbott, Senior Associate (added 29 January 2020)

Matthew Pickup, Legal Solutions Specialist (added 10 February 2020)

Wannisa Johnston, Legal Solutions Specialist (added 19 February 2020)

Abigail Legge, Associate (added 27 April 2020)

Sarah Holland, Associate (added 7 October 2020)

Lydia Ream, Associate (added 7 October 2020)

Emma Probyn, Senior Associate (added 7 October 2020)

- Pippa Walker, Legal Solutions Specialist (added 10 February 2021)
- Rebecca Withey, Associate (added 8 March 2021)
- Massimiliano Bonifacino, Legal Solutions Specialist (added 8 March 2021)
- Caroline Ellard, Associate (added 2 June 2021)
- Amy Sanderson, Associate (added 2 September 2021)
- Felicity Ellis, Associate (added 10 September 2021)
- Adil Khan, Legal Solutions Specialist (added 10 September 2021)
- Alexandra Lazell, Associate (added 30 September 2021)
- Jonathon Oldfield, Associate (added 4 October 2021)
- Ramya Arnold, Senior Associate (added 21 October 2021)
- Titilayo Filani, Senior Associate (added 29 October 2021)
- Steph Fulton, Legal Solutions Specialist (added 16 November 2021)
- Hannah Vo, Legal Solutions Specialist (added 16 November 2021)
- Frank Clarke, Senior Associate (added 1 December 2021)
- Francy Glennon, Paralegal (added 14 January 2022)
- Jack Helyar, Associate (added 7 February 2022)
- Tom Hutchison, Counsel (added 1 March 2022)
- Marcus Starke, Senior Associate (added 21 March 2022)
- Alisha Wright, Associate (added 11 April 2022)
- Laura Trigg, Associate (added 11 April 2022)
- Tara Ahluwalia, Associate (added 11 April 2022)
- Andrew Layland, Associate (added 11 April 2022)
- Nazeerah Akbar, Associate (added 11 April 2022)
- Tania Saleh, Associate (added 3 May 2022)
- Sibel Köylü, Transaction Lawyer (added 12 May 2022)
- Christine Simpson, Associate (added 20 May 2022)
- Josh Goodman, Associate (added 24 May 2022)

Patrick Teague, Senior Associate (added 30 May 2022) Alicja Danek, Paralegal (added 31 May 2022) Mariam Kalaf, Paralegal (added 31 May 2022) Jordana West, Legal Solutions Manager (added 31 May 2022) Niamh Lofthouse, Senior Legal Solutions Specialist (added 9 June 2022) Giana Narciso, Legal Solutions Specialist (added 24 June 2022) Kamila Mikruta, Legal Solutions Specialist (added 24 June 2022) Holly Barrowcliff, Legal Solutions Specialist (added 24 June 2022) Vaibhav Manchanda, Trainee Solicitor (added 26 August 2022) Grace Kettle, Trainee Solicitor (added 26 August 2022) Liam Li, Trainee Solicitor (added 26 August 2022) Samuel Christie, Trainee Solicitor (added 26 August 2022) Annabel Kennard, Trainee Solicitor (added 26 August 2022) Julie Letort, Trainee Solicitor (added 26 August 2022) Enrico Cavatorta, Trainee Solicitor (added 26 August 2022) Ethan Lo, Trainee Solicitor (added 5 September 2022) Oscar Battell-Wallace, Associate (added 23 September 2022) Kelley Macpherson, Associate (added 7 October 2022) Tiffany Hui, Associate (added 7 October 2022) Alice Mingay, Associate (added 7 October 2022) Ellen Mirchandani, Associate (added 7 October 2022) Roshana Ching, Associate (added 7 October 2022) Daniel McGivern, Associate (added 20 October 2022) Mark Sansom, Partner (added 1 November 2022)

#### <u>Contrast</u>

Frank Wijckmans, Partner Maaike Visser, Counsel Karolien Francken, Associate Monique Sengelov, Associate

Brick Court Mark Hoskins QC Sarah Ford QC Sarah Abram Daniel Piccinin Hugo Leith Jon Lawrence Jennifer MacLeod (added 31 January 2019) Jacob Rabinowitz (added 3 August 2020) Danielle Carrington, Pupil Barrister (added 30 September 2022)

Fountain Court Chambers

Hannah Bernstein (added 6 October 2021)

Essex Court Chambers

Katherine Ratcliffe (added 11 April 2022)

Frontier Economics

Zoltan Biro, Director (added 31 January 2019)

Chris Newton, Director (added 31 January 2019)

Fraser Davison, Manager (added 31 January 2019)

Peter Northall, Consultant (added 23 April 2019)

Luís Campos, Associate Director (added 18 December 2019)

Jon Adlard, Manager (added 18 December 2019)

Xavier Mas, Manager (added 18 December 2019)

Viktoriya Peycheva, Consultant (added 18 December 2019) Mumtad Choudhury, Project Manager (added 16 January 2020) Jakob Hinger, Analyst (added 18 June 2020) Josefa Knippers, Analyst (added 23 July 2020) Will Carpenter, Analyst (added 15 October 2020) Prarthana Prabhakar, Consultant (added 17 November 2020) Sarah Pennington, Consultant (added 17 November 2020) Henning Sökeland, Analyst (added 30 November 2020) Sumaiya Rahman, Analyst (added 30 November 2020) Judy Wang, Analyst (added 30 November 2020) Robert Bowdery, Consultant (added 3 December 2020) Paula Balina Vieites, Analyst (added 19 February 2021) Pauline Bertino, Consultant (added 4 May 2021) Greg Wilkinson, Consultant (added 4 May 2021) Romain Defoort, Consultant (added 4 May 2021) Fabian Schrogl, Analyst (added 2 June 2021) Michael Zelenka, Analyst (added 24 June 2021) Bianca Montironi, Intern (added 24 June 2021) Grant Hunter, Consultant (added 11 August 2021) Alexander Dubey, Analyst (added 11 August 2021) Joseph Dunnill, Analyst (added 17 September 2021) Holly Turner, Analyst (added 17 September 2021) Filippo Maria Bandini, Intern (added 17 September 2021) Marion Lothmann, Consultant (added 30 September 2021) Rachel Keyserlingk, Consultant (added 15 October 2021) Matthew Smith, Analyst (added 15 October 2021) Guillaume Dolle, Consultant (added 29 October 2021) Mattania Grousson, Analyst (added 29 October 2021)

Paolo Monteiro de Macedo, Analyst (added 29 October 2021) Duncan Lishman, Manager (added 8 November 2021) Scott Burrell, Analyst (added 8 November 2021) Alicia Wyke, Analyst (added 16 November 2021) Elias Goelz, Consultant (added 26 November 2021) Jacek Stachowski, Consultant (added 26 November 2021) Noémie Bourdrez, Intern (added 20 December 2021) Alasdair McCulloch, Intern (added 20 December 2021) Dominic Friel, Analyst (added 14 January 2022) Ellie Travers, Consultant (added 14 January 2022) Josef Schumacher, Analyst (added 20 January 2022) Andrew Booth, Consultant (added 20 January 2022) Lyu Georgiev, Consultant (added 20 January 2022) Daniel Burton, Consultant (added 1 February 2022) Matthew Parry, Analyst (added 1 February 2022) Chiara Anselmetti, Analyst (added 1 February 2022) Sara Del Vecchio, Manager (added 4 February 2022) Sonia Razi, Consultant (added 4 February 2022) Will Carroll, Analyst (added 4 February 2022) Zuzana Bakusova, Analyst (added 2 March 2022) Adam Murawski, Intern (added 15 March 2022) Simarjit Gill, Analyst (added 6 April 2022) Jack Brownson, Analyst (added 6 April 2022) Atousa Tahmasebi, Analyst (added 6 April 2022) Li Zhao, Analyst / Data Scientist (added 6 April 2022) Ludovico Lattanzi, Intern (added 6 April 2022) Philippa Jones, Analyst (added 11 April 2022) Julia Dietrich, Director (added 3 May 2022)

Christoph Nodop, Consultant (added 3 May 2022) André Pfannenschmidt, Consultant (added 3 May 2022) Mihir Baxi, Consultant (added 3 May 2022) Julia Gorochovskij, Analyst (added 3 May 2022) Christian Kauth, Intern (added 3 May 2022) Chiara Loriaux, Intern (added 3 May 2022) Nick Lynd, Consultant (added 17 May 2022) Anton Knoche, Analyst (added 24 May 2022) Elisabeth Borchert, Intern (added 24 May 2022) Richard Sens, Intern (added 24 May 2022) Zoe Lederman, Consultant (added 15 June 2022) Javier Urrutia, Consultant (added 24 June 2022) Frederick Harrington, Consultant (added 24 June 2022) Karen Trovamala, Intern (added 24 June 2022) David Lawrence, Consultant (added 4 July 2022) Weronika Czubek, Intern (added 4 July 2022) Lydia Field, Analyst (added 5 July 2022) Daniel Lewis, Consultant (added 13 July 2022) Arthur Maccari, Intern (added 13 July 2022) Jakub Terlikowski, Data Scientist (added 13 July 2022) Tega Akati-Udi, Analyst (added 26 July 2022) Ignacio Loeser, Consultant (added 9 August 2022) Sean Crawford, Intern (added 9 August 2022) Fernando Louge, Manager (added 22 August 2022) Martin Streichardt, Analyst (added 22 August 2022) Edward Natusch, Intern (added 5 September 2022) Charlotte Dalton, Intern (added 15 September 2022) Antonia Mather, Intern (added 23 September 2022)

Julia Robertson, Analyst (added 6 October 2022) Brian Toale, Analyst (added 6 October 2022) Yashvir Surana, Consultant (added 20 October 2022)

## **Eversheds Sutherland**

Julia Woodward-Carlton, Partner (added 19 July 2019) Rosalind Kellaway, Partner (added 19 July 2019) Andrew Chandler, Consultant (added 19 July 2019)

#### Oxera Consulting LLP

Robin Noble, Partner (added 6 December 2021) Joseph Bell, Partner (added 6 December 2021) Kimela Shah, Principal (added 6 December 2021) Lorenz Adams, Consultant (added 6 December 2021) Tristan Byrne, Consultant (added 6 December 2021) Serhat Ugurlu, Technical Advisor (added 6 December 2021) Stefan Witte, Senior Consultant (added 6 December 2021) Max Kuipers, Analyst (added 20 January 2022) Christian Sambou, Analyst (added 20 January 2022) Prince Montagna, Analyst (added 18 February 2022) Dr Ambroise Descamps, Senior Consultant (added 16 March 2022) Jeremy Macrae, Consultant (added 18 August 2022) Hannes Seidel, Consultant (added 18 August 2022) Bertram Neurohr, Technical Adviser (added 18 August 2022) Dr Kaat Iterbeke, Analyst (added 12 October 2022) Jose Sánchez-Ameijeiras, Analyst (added 20 October 2022) Walter Beckert, Academic Associate (added 1 November 2022)

# Fifth to Sixth Defendants in the Dawsongroup proceedings and Tenth to Thirteenth Defendants in the Ryder proceedings (Mercedes/Daimler)

Quinn Emanuel Urquhart & Sullivan UK LLP

Boris Bronfentrinker, Partner

Nicola Chesaites, Of Counsel

Maria Campbell, Senior Associate (added 7 November 2018)

Cordelia Rayner, Senior Associate

James McSweeney, Associate

Laura Abram, Associate

Nabil Khabirpour, Associate

Hannah Dixie, Associate

Kerry Hanley, Paralegal (added 21 January 2019)

Katarzyna Gorna, Contract Attorney (added 21 January 2019)

Elaine Whiteford, Partner (added 2 May 2019)

Hamish Saunders, Associate (added 15 July 2019)

Michael Trauffer, Contract Attorney (added 18 October 2019)

Daniel Masterton, Associate (added 29 October 2019)

Kate Lawrence-Smith, Paralegal (added 9 March 2020)

Anthony Hadjiantoniou, Associate (added 10 March 2020)

Michelle Clark, Of Counsel (added 18 January 2021)

Abhijeet Sinha, Associate (added 17 February 2021)

Ruy Bucholz, Contract Lawyer (added 7 July 2021)

Karthic Kukathasan, Contract Lawyer (added 7 July 2021)

Anna Rylik, Paralegal (added 10 September)

Charlotte Martin, Associate (added 14 September 2021)

Ellie Byrne, Paralegal (added 5 October 2021)

Macfarlanes LLP

Cameron Firth (Partner) – added 23 November 2021

Simon Day (Partner)- added 23 November 2021 Emma Radcliffe (Partner)- added 23 November 2021 Daniel Lavender (Partner) – added 10 December 2021 Stephen Kon (Senior Consultant)- added 23 November 2021 Caja Griesenbach (Senior Solicitor)- added 23 November 2021 Alex Evans (Senior Solicitor)- added 23 November 2021 Edward Parry-Smith (Senior Solicitor) – added 23 November 2021 Timothy Ballingal (Senior Solicitor)- added 28 February 2022 Jennifer Reeves (Senior Associate)- added 25 August 2022 Isabel Martorell (Senior Lawyer) – added 15 December 2021 Matthew Redfern (Solicitor)- added 23 November 2021 Isabel Gilbert (Solicitor)- added 23 November 2021 Malte Ernsting (Solicitor)- added 23 November 2021 Sheila Dines (Solicitor) – added 15 December 2021 James Reid (Solicitor) – added 10 December 2021 Christian Leighton (Solicitor)- added 23 November 2021 Maria Myrianthopoulou (Solicitor)- added 21 March 2022 Jessica Arapu (Solicitor)- added 11 May 2022 Gina Sternberg (Solicitor)- added 11 May 2022 Hriday Munim (Trainee Solicitor)- added 23 November 2021 Chris Wood (Trainee Solicitor)- added 21 March 2022 Nikisha Rai (Trainee Solicitor)- added 21 September 2022 Ian Li (Paralegal) – added 23 November 2021 Alesha Shah (Paralegal) – added 14 February 2022

## Gleiss Lutz Hootz Hirsch PartmbB Rechtsanwälte

Dr Ulrich Denzel, Partner

Dr Johannes Hertfelder, Associated Partner

Rhued Gaiser, Associate Harald Weiss (added 21 May 2019) Philipp Lohs (added 21 May 2019) Christian Kockritz (added 21 May 2019) Dr Daniela Drixler, Legal Counsel (added 9 July 2020) Moritz Krause, Project Associate (added 25 January 2021) <u>Monckton Chambers</u> Paul Harris QC Ben Rayment Michael Armitage Alexandra Littlewood (added 21 January 2019)

## E.CA Economics GmbH

Dr Rainer Nitsche, Director Dr Thomas Hildebrand, Principal Bas Dessens, Associate Principal Harm van Leeuwen, Economist Thomas Nau, Economist (added 11 December 2019) Jan Christopher Rönn, Economist (added 11 December 2019) Juri Simons, Economist (added 11 December 2019) Ignacio Balaguer Lopez, Economist (added 23 October 2020) Niklas Gebhard, Economist (added 23 October 2020) Alix de Loustal, Economist (added 23 October 2020) Luca Rancati, Junior Economist (added 23 October 2020) Simon Franke, Economist (added 25 January 2021) Thomas Séron, Economist (added 3 June 2021) Raphael Poncet, Economist (added 15 September 2022)

#### Weijie Yan, Economist (added 13 October 2022)

EFS Unternehmensberatung Gesellschaft m.b.H.

Wolfgang Suttner, Senior Expert

Georg Klanfar, Project Manager

Benedikt Wohlmuth, Account Manager (added 25 January 2021) Flora Wiercimak, Consultant (added 25 January 2021) Jittawilai Jiyavorananda, Consultant (added 25 January 2021) Maximilian Mrstik, Project Manager (added 10 September 2021)

Alexander Trubatsch, Data Analyst (added 10 September 2021)

Yaryna Mykytyn, Consultant (added 16 September 2021)

## AlixPartners LLP

Andrew Grantham, Managing Director (added 19 October 2018) Greg Huitson-Little, Director (added 19 October 2018) Camelia O'Brien, Consultant Mat Hughes, Managing Director (added 19 October 2018) Martin Lewis, Non-Executive Director (added 31 May 2019) Peter Wright, Senior Vice President (added 4 February 2020) Scott Beattie, Director (added 4 February 2020) Anne-Marie Hitchen, Senior Vice President (added 4 February 2020) Marc Morgan, Vice President (added 4 February 2020) Wen Fen Chong, Vice President (added 4 February 2020) Tom Millar, Consultant (added 4 February 2020) Samantha Bainbridge, Employee (added 11 May 2020) Sarah Rodin, Vice President (added 3 June 2021) Kuang Yu, Vice President (added 10 September 2021) Rowan Thompson, Senior Vice President (added 27 October 2021) Phil Tucker, Consultant (added 27 October 2021)
Rob Lockwood, Director (added 10 December 2021)
Oliver Rake, Vice President (added 10 December 2021)
Christopher Mahlo, Consultant (added 10 December 2021)
James Sunderland, Vice President (added 10 December 2021)
David Waterfield, Director (added 10 December 2021)
Andrea McLaren, Independent Contractor, Senior Vice President (added 6 January 2022)
Elaine Walsh, Independent Contractor, Vice President (added 6 January 2022)
Sid Harding, Independent Contractor, Vice President (added 6 January 2022)
Viran Daya, Independent Contractor, Vice President (added 6 January 2022)
Katerina Vasiliou, Consultant (added 12 July 2022)

## First to Fourth Defendants in the Ryder proceedings (MAN)

Slaughter and May Richard Swallow, Partner Damian Taylor, Partner Holly Ware, Partner Tom Windsor, Associate Akbar Hassan, eDisclosure coordinator Antonia Tjong, Associate (added 18 December 2018) Phyllis Guven, Associate (added 11 January 2019) Ross Francis-Pike, Associate (added 5 February 2019) Nicholas Quirke, Associate (added 21 March 2019) William Doyle, Associate (added 03 July 2019) Thomas Grodecki, Associate (added 08 July 2019) Alexander Cranstoun, Trainee Solicitor (added 18 September 2019) Elizabeth Jordan, Senior Counsel (added 14 January 2020) Robert Worthington, Evidence and Operations Manager (added 16 March 2020) Nicholas Lee, Associate (added 3 July 2020) Heather Crosby, Trainee Solicitor (added 3 September 2020) Emily Boseley, Trainee Solicitor (added 3 September 2020) Alexandra Zintl, Paralegal (added 11 September 2020) Harriet Saunders, Associate (added 10 November 2020) Jeremy Barnett, Paralegal (added 17 December 2020) Max Rayner, Paralegal (added 25 January 2021) Emmanuelle Beaumes, Paralegal (added 26 January 2021) Tiffany Chan, Associate (added 10 February 2021) Lucy Chambers, Associate (added 12 February 2021) Hajra Rehman (added 19 February 2021) Adam Waring, Trainee Solicitor (added 24 February 2021) Alex Charlton-Jones, Trainee Solicitor (added 24 February 2021) Patrick Kenny, Trainee Solicitor (added 24 February 2021) Tabitha Brown, Trainee Solicitor (added 24 February 2021) Eleanor Healy-Birt, Associate (added 24 February 2021) Nick Ames, Associate (added 26 February 2021) Sophia Tarsounas, Trainee Solicitor (added 4 March 2021) Jake Richardson, Trainee Solicitor (added 08 March 2021) Jardelle Johnson, Trainee Solicitor (added 12 March 2021) Margaret Polk, Trainee Solicitor (added 12 March 2021) Remi Pfister, Trainee Solicitor (added 12 March 2021) Raza Nazar, Associate (added 29 March 2021) Jonathan Clark, Partner (added 19 May 2021) Yan Lai, Trainee Solicitor (added 4 June 2021) Suneel Kumar, eDisclosure coordinator (added 16 June 2021) Charles Roberts, Paralegal (added 7 July 2021) Esme Malley, Paralegal (added 7 July 2021)

Marinella Di Bari, Contract Lawyer (added 15 July 2021) Oscar Martinez, Contract Lawyer (added 15 July 2021) Vitor Castro, Contract Lawyer (added 15 July 2021) Inderjeet Gill, Contract Lawyer (added 20 July 2021) Rahim Talibzade, Paralegal (added 20 July 2021) Gabriela Margues, Contract Lawyer (added 17 August 2021) Marcia Barrett, Contract Lawyer (added 17 August 2021) Djamela Magid, Contract Lawyer (added 18 August 2021) Kotryna Toropovaite, Contract Lawyer (added 18 August 2021) Rose Stringer, Contract Lawyer (added 18 August 2021) Phoebe Harris, Trainee Solicitor (added 1 September 2021) Phoebe Robinson, Trainee Solicitor (added 1 September 2021) Stephanie McAnally, Trainee Solicitor (added 1 September 2021) Ben Stanworth, Trainee Solicitor (added 9 September 2021) Ivo Trice, Trainee Solicitor (added 9 September 2021) Mimi Albanyan, Trainee Solicitor (added 9 September 2021) Matthew Hearn, Trainee Solicitor (added 9 September 2021) Rory Flynn, Trainee Solicitor (added 9 September 2021) Olivia Dawson, Trainee Solicitor (added 30 September 2021) Luise Luetcke, Associate (added 8 October 2021) Megan Sandler, Associate (added 20 October 2021) Elizabeth Cooper, Trainee Solicitor (added 20 October 2021)

#### Hengeler Mueller

Markus Roehrig, Partner Daniel Zimmer, Partner Sarah Milde, Senior Associate Thorsten Maeger, Partner Lea Kristina Cleophas, Associate Aenne Tetz, Associate Jimena Janeiro Fong, Associate (added 5 February 2019) Luisa Kuschel, Senior Associate (added 8 March 2019) Philipp Kanzow, Associate (added 6 June 2019) Irene Rodenstock (added 28 August 2019) Caroline Madeleine Beyersdorf, Associate (added 26 November 2020) Clara Lütgerath, Associate (added 26 November 2020) Martina Aleksandrova, Associate (added 26 November 2020) Gerlind Wolf, Associate (added 1 September 2021) Felix Klueter, Senior Associate (added 22 September 2021)

## Brick Court Chambers

Daniel Jowell QC, Counsel Tom Pascoe, Counsel David Bailey, Counsel (added 18 December 2018) Jonathan Scott, Barrister (added 24 September 2019)

#### Compass Lexecon

Jorge Padilla, Senior Managing Director Nadine Watson, Senior Vice President Sofia Galan Perez, Economist Norbert Czinkan, Senior Analyst Thilo Klein, Executive Vice President Elena Zoido, Senior Vice President Soledad Pereiras, Vice President Michael Scheidgen, Senior Economist Edward Bond, Economist Jasper Haller, Senior Economist Raquel Diez, Senior Economist Carla Banfi, Economist Stefano Trento, Vice President (added 5 February 2019) Florian Mfockel, Economist (added 23 October 2019) Tristan Salmon, Senior Analyst (added 23 October 2019) Janani Dhileepan, Analyst (added 23 October 2019) Sebastien Grotto, Analyst (added 23 October 2019) Marion Chabrost, Economist (added 14 April 2020) Giulio Paltrinieri, Senior Analyst (added 14 April 2020) Kristi Dode, Analyst (added 3 September 2020) Gwilhem Charbonnier, Economist (added 8 October 2020) Arpita Pattanaik, Analyst (added 2 December 2020) Manuel Frewer, Analyst (added 25 January 2021) Lau Nilhausen, Senior Vice President (added 25 January 2021) Daniel Ball, Research Analyst (added 29 March 2021) Mara Siegesmund, Analyst (added 8 June 2021) Inés Noval Felgueroso, Analyst (added 16 June 2021) Kuljeetsinh Nimbalkar, Analyst (added 16 June 2021) Pasindhu Mawalage, Research Analyst (added 16 June 2021) Theresa Ng'andu, Research Analyst (added 16 June 2021) Toby Howard, Research Analyst (added 20 July 2021) Krister Rasmussen, Analyst (added 1 September 2021) Nikita Marini, Analyst (added 1 September 2021) Esteban Cattaneo, Economist (added 14 September 2021) Rahel Krauskopf, Analyst (added 14 September 2021)

## FTI Consulting

Navin Waghe, Senior Managing Director (added on 09 July 2019) Matt Burder, Senior Director (added on 09 July 2019) Nick Leese, Director (added on 09 July 2019) Thomas Maassen, Senior Consultant (added on 09 July 2019) Connor Gower, Consultant (added 18 February 2020) Andrew Hine, Consultant (added 1 April 2020) Genna Aldridge, Director (added 1 April 2020) Katherine Glennie-Soares, Consultant (added 1 April 2020) Kean Seeger, Consultant (added 21 July 2020) Adeline Sou, Consultant (added 12 November 2020) Josie Davies, Consultant (added 12 November 2020) Matthew Burt, Senior Consultant (added 12 November 2020) Corinne Rogers, Consultant (added 30 March 2021) Fred Hudson, Consultant (added 30 March 2021)

## Twelfth to Sixteenth Defendants in the Ryder proceedings (Iveco)

Herbert Smith Freehills LLP
Kim Dietzel, Partner (added 29 September 2021)
Gregg Rowan, Partner (added 23 November 2021)
Grace Aylward, Senior Associate (added 3 August 2021)
Daniel Woods, Senior Associate (added 3 August 2021)
Christon Shenolikar, Senior Associate
James White, Senior Associate (added 3 August 2021)
Stephen Thomson, Senior Associate (added 3 August 2021)
Antony Ganev (added 12 October 2018)
Gerarda Morton, Legal Manager (added 12 October 2018)
Catherine Muir, Senior Former Practising Barrister (added 12 October 2018)
John Cagan, Paralegal (added 22 October 2018)

Nikita Davé, Associate (added on 7 November 2018) Anne Eckenroth (added on 7 November 2018) James Farrell, Partner (added 14 November 2018) Antonia Brindle, Associate (added 13 December 2018) Jane Johnston, Senior Legal Analyst (added 13 December 2018) Daniel May, Senior Associate (added 8 January 2019) Mairead Connolly, Solicitor (Northern Ireland) (added 13 February 2019) Shannon Roddy, Legal Analyst (added 13 February 2019) Graeme Robertson, Senior Associate (added 25 February 2019) Natalia Rodriguez, Of Counsel (added 25 February 2019) Olivia Walton, Senior Associate (added 25 February 2019) Helen Bignall, Of Counsel (added 8 March 2019) Naomi Reid, Associate (added 8 March 2019) Rebekah Dixon, Senior Associate (added 2 April 2019) Alfredo De Stefano, Paralegal (added 5 April 2019) Saima Zafar, Paralegal (added 1 May 2019) Ramyaa Veerabathran, Associate (added 25 July 2019) Jerome Temme, Associate (added 27 August 2019) Ben Phillips, Associate (added 28 August 2019) Linet Kurian, Trainee Solicitor (added 28 August 2019) Ina Metko, Associate (added 4 September 2019) Annika Gante, Associate (added 4 September 2019) Nikolaus Moench, Associate (added 10 September 2019) Caora Mackell, Trainee Solicitor (added 15 October 2019) Janice Sowah, Paralegal (added 18 October 2019) Dylan McBurney, Legal Analyst (added 4 November 2019) Stephen Wisking, Partner (added 9 January 2020) Andrew North, Of Counsel (added 9 January 2020)

Max Kaufman, Senior Associate (added 9 January 2020) Niall Kennedy, Senior Solicitor (Northern Ireland) (added 23 January 2020) Joe Moorcroft-Moran, Associate (added 3 August 2021) Asmita Singhvi, Trainee Solicitor (added 11 March 2020) Patrick O'Connor, Legal Analyst (added 16 April 2020) Suzanne Campbell, Of Counsel (added 30 November 2020) Shula Parry, Associate (added 18 December 2020) Ritwik Bhattacharya, Graduate Solicitor (added 25 February 2021) Tamsin Rankine-Fourdraine, Associate (added 10 March 2021) Alex White, Senior Associate (added 10 March 2021) Marie Becker, Associate (added 10 March 2021) Alexander O'Connell-Danes, Associate (added 12 May 2021) David O'Neill, Associate (Employed Barrister) (added 13 May 2021) Sungmin Cho, Trainee Solicitor (added 2 September 2021) Katie-Scarlett Wetherall (added 2 September 2021) Ananya Bajpai (added 2 September 2021) Michael Edwards (added 2 September 2021) Zoe Morris (added 2 September 2021) Rupert Swallow (added 2 September 2021) Steven Chua, Associate (added 29 September 2021) Tamsin Baird, Senior Associate (added 28 October 2021) Lucy McBride (added 3 November 2021) Agostino Bignardi, Associate (added 22 December 2021) Benedict Hermann, Senior Legal Analyst (added 2 February 2022) Eve Meurgey, Associate (added 17 March 2022) Deirdre O'Kane, Solicitor (added 21 June 2022) Louisa Cranfield, Associate (added 7 July 2022) Csilla Cao (aka Wen Yi Cao), Trainee (added 3 September 2022)

Savannah van Dongen, Trainee (added 3 September 2022) Georgie Green, Trainee (added 3 September 2022) Isabel Rigby, Trainee (added 3 September 2022) Darius White, Trainee (added 3 September 2022) Suman Sachdev, Trainee (added 3 September 2022) Demi Alade, Trainee (added 7 September 2022) Tihomir Svilanovic, Trainee (added 7 September 2022) Jude Watts, Trainee (added 20 September 2022) Karin Pastikova, Trainee (added 27 September 2022) Ngoumy Julie Carla Mkabop Yimgna, Trainee (added 27 September 2022) Christoph Loy, Associate (added 20 October 2022) Hannah Williams, Associate (added 27 October 2022)

## Sullivan & Cromwell LLP

Juan Rodriguez, Partner

Marielena Doeding, Associate (added 15 January 2021)

Brick Court Chambers Tony Singla QC (added 3 August 2021) Max Schaefer Matthew Kennedy (added on 7 November 2018) Aaron Khan (added on 18 October 2019) Charles Hollander QC (added 30 September 2020) Andrew McIntyre (added 13 September 2021)

## **Blackstone Chambers**

Monica Carss-Frisk QC (added 18 September 2020)

Compass Lexecon Lorenzo Coppi (added 10 August 2021) Michele Avagliano Ming Yu Wong (added 10 August 2021) Kristofer Hammarback, Senior Economist (added 3 August 2021) Gytautas Karklius, Economist (added 12 October 2018) Andy Parkinson (added 12 October 2018) Laura Rovegno, Senior Economist (added 22 January 2019) Jin Kiat Tan, Economist (added 22 January 2019) Balram Sennik (added 22 January 2019) Simon Collis, Analyst (added 1 October 2019) Alan Rozenberg, Vice President (added 1 October 2019) Harry Gosling, Analyst (added 1 October 2019) James Wong, Senior Analyst (added 1 October 2019) Rebecca Reichert, Analyst (added 4 November 2019) Aric Chau, Research Analyst (added 4 November) Emmet Lenoach, Research Analyst (added 12 November 2019) Laura Phaff, Vice President (added 3 December 2019) Mallika Arora, Economist (added 9 January 2020) Choo Zhixin (known as Verdi Choo), Senior Analyst (added 9 January 2020) Vivien Csonka, Senior Analyst (added 9 January 2020) Hiranmayee Rajan, Analyst (added 9 January 2020) Gonçalo Manuel Dinis Da Silva Gomes, Research Analyst (9 January 2020) James Forster, Analyst (added 23 January 2020) Kadambari Prasad, Senior Economist (added 23 January 2020) Sasha Guest, Research Analyst (added 20 February 2020) Zivue Yang, Analyst (added 6 April 2020) Noorah Al Faris, Analyst (added 20 May 2020)

Xiaoshi Shi, Analyst (added 29 May 2020) Anisa Kabir, Senior Analyst (added 24 June 2020) Giovanni Pierdomenico, Intern (24 June 2020) Josep Peya, Senior Analyst (added 28 August 2020) Joshua Jun Heng Phoon, Analyst (added 28 August 2020) Muxing Webster Zhou, Research Analyst (added 28 August 2020) Sara Sorbini, Research Analyst (added 18 September 2020) Sara Vojvodic, Senior Analyst (added 18 December 2020) Zsolt Hegyesi, Analyst (added 30 March 2021) Sean Lavender, Research Analyst (added 30 March 2021) James Andrews, Economist (added 5 May 2021) Joseph Simpson, Analyst (added 5 May 2021) Shikha Bhaskar, Analyst (added 5 May 2021) Cindy Nah, Economist (added 27 May2021) Kah Loon Tham, Analyst (added 27 May 2021) Gianluca Strada, Analyst (added 1 July 2021) Chiara Gilardi, Research Analyst (added 1 Julyt 2021) Tanya Patil, Intern (added 1 July 2021) Alberto Minghetti, Intern (added 1 July 2021) Paolo Lozza, Analyst (added 26 September 2021) Lars Martinez Ridley, Analyst (added 26 September 2021) Elisa Pietrosimone, Economist (added 24 August 2021) Karthik Raghavan, Economist (added 24 August 2021) Deiana Hristov, Research Analyst (added 4 October 2021) Kiran Manthry, Research Analyst (added 4 October 2021) Abigail Davis, Research Analyst (added 4 October 2021) Ann-Christine Schwegmann, Senior Analyst (added 28 October 2021) Conor Duggan, Senior Analyst (added 23 November 2021)

Justice Yennie, Research Analyst (added 13 December 2021) Jun Kai Wee, Senior Economist (added 30 December 2021) Anjali Sachdev, Research Analyst (added 2 February 2022) Karan Garg, Research Analyst (added 2 February 2022) Omer Brender, Senior Economist (added 2 February 2022) Daryl Tiong, Senior Analyst (added 9 February 2022) Andrea Pirrone, Economist (added 15 March 2022) Filippo Paternollo, Analyst (added 27 September 2022)

#### FTI Consulting LLP

Ruth Steedman, Senior Managing Director (added 29 May 2020) Andrew Green, Managing Director (added 29 May 2020) Alistair Winning, Managing Director (added 29 May 2020) Morgan Clement, Senior Director (added 29 May 2020) Ying Lai, Associate (added 29 May 2020) Timothy Gardiner, Senior Director (added 25 November 2020) Mike Pilgrem, Senior Managing Director (added 25 November 2020) Timothy Richards, Director (added 25 November 2020) Mark Putney, Director (added 25 November 2020) Buuruljin Enkhbold, Senior Consultant (added 25 November 2020) Euan Philip, Senior Consultant (added 25 November 2020) William Locke, Consultant (added 25 November 2020) Zain Faheem, Consultant (added 25 November 2020) Callum Cooper, Consultant (added 25 November 2020) Amber Standish, Consultant (added 25 November 2020) This part contains names of Outer Confidentiality Ring Members (excluding Outer Confidentiality Ring Members) who are also Inner Confidentiality Ring Members):

# PART B

# **Dawsongroup** Claimants

Dawsongroup plc

Steve Miller, Group Chief Executive

Tony Coleman, Group Finance Executive Richard Bulmer, Group Legal Manager

# **Ryder Claimants**

Sanford J Hodes (Deputy General Counsel, Ryder System Inc.)

Natalie Waldron (UK Legal Counsel)

Chris Burston, Internal Auditor

# **DS Smith Claimants**

Iain Simm, Group General Counsel

Wendy Ko, Group Legal Director (Paper, Paper Sourcing, Recycling & Procurement)

Catherine Shuttleworth, Legal Director (Packaging)

Nazia Cassamali, Legal Counsel

William Hicks, Chief Financial Controller

Charlotte Avenarius (Paralegal)

# <u>First to Fourth Defendants in the Dawsongroup proceedings and Seventeenth to Twentieth</u> <u>Defendants in the Ryder proceedings (DAF)</u>

## PACCAR Inc

Preston Feight, Executive Vice President

Harrie Schippers, Chief Financial Officer and Executive Vice President (added 26 September 2019)

Michael Walton, General Counsel (added 10 September 2020)

# DAF Trucks N.V

Harry Wolters, President (added 11 September 2019)

Nico den Houting, Project Manager for Civil Litigation (added 6 March 2019)

Mario Suy, Project Manager Financial Data (added on 06 March 2019)

Sanne Boullart, Assistant Project Manager for Civil Litigation (added on 06 March 2019) Wouter de Jong, Head of Litigation at DAF Trucks NV (added 17 November 2020) Floortje Jansen, Assistant General Counsel at DAF Trucks NV (added 18 November 2020) Marcel Groothuismink, Legal Counsel (added 31 August 2021)

## DAF Trucks N.V

Duco Zoomer, General Counsel (added 1 March 2019)

## Seventh to Eleventh Defendants in the Dawsongroup proceedings (Volvo/Renault)

Ross Goodrich, Corporate Litigation Counsel, AB Volvo (publ) (added 31 January 2019) Arnaud Agelou, Legal & Compliance Director, Renault Trucks SAS Simon Villanueva, Legal Director, Volvo Group UK Limited Magnus Heidenvall, Vice President Legal, Volvo Trucks Corporation (added 6 May 2020) Anders Lindskog, Legal Counsel, Volvo Trucks Corporation (added 4 January 2021)

# Fifth to Sixth Defendants in the Dawsongroup proceedings and Tenth to Thirteenth Defendants in the Ryder proceedings (Mercedes/Daimler)

Daimler AG

Thomas Laubert, Vice President and Group General Counsel (added 5 September 2018)

Florian Adt, Associate General Counsel

Steffen Scherer, Senior Legal Counsel

Ute Pazer, Senior Legal Counsel

Miklos Mudrony, Legal Counsel

Bernhard Hauenschild, Legal Counsel

Wolfgang Krafft, Senior Manager Sales & Marketing

Kirsten Grundmann, Manager Sales & Marketing

Rainer Meyle, Manager Sales & Marketing

Christian Koch, Associate General Counsel (added 24 June 2019)

Volker Abele, Legal Counsel (added 25 October 2019)

Myriam Spengler, Senior Legal Counsel (added 20 January 2020)

# Daimler Truck AG

Britta Abeshaus, Legal Counsel (originally added 20 March 2020 for Daimler AG; updated undertaking for Daimler Truck AG filed on 10 December 2021)

Yvonne Herr, Legal Counsel (originally added 20 January 2020 for Daimler AG; updated undertaking for Daimler Truck AG filed on 10 December 2021)

Vanessa Lempke, Legal Counsel

Katharina Tomlinson, Legal Counsel

# Mercedes-Benz Cars UK Limited

Jonathan Lipman, General Counsel

Stacey Dransfield, Deputy General Counsel

Sam Whittaker, Director of Customer Service & Parts (Mercedes-Benz Trucks UK Limited)

Ross Paterson, Head of Product and Marketing (Mercedes-Benz Trucks UK Limited)

James Venables, Key Account Manager (Mercedes-Benz Trucks UK Limited)

Simon Anthony, IT Design Architect

# First to Fourth Defendants Defendants in the Ryder proceedings (MAN)

Dr. Martin Gstaltmeyr, General Counsel

Dr. Anja Doering, Senior Legal Counsel

Sebastian Hausner, Legal Counsel

Elif-Selcen Ciftci, Legal Counsel

Isabelle Guetlein, Clerk (added 29 January 2021)

Man Truck and Bus UK Limited

Adam Tanner, Legal Counsel and Company Secretary (added 18 March 2021)

# Fourteenth to Sixteenth Defendants (Iveco)

Roberto Russo, General Counsel and Company Secretary

Simona Finati, Head of Legal Italy

Simon McCarthy, Legal North Europe and Africa Middle East

Craig Marshall, In-House Solicitor, CNH Industrial (added 8 March 2019)

Marcella Ortolan, Practice Leader Antitrust and Competition Law, Fiat Chrysler Automobiles N.V (added 21 November 2019)

Giorgio Fossati, General Counsel, Fiat Chrysler Automobiles N.V. (added 22 June 2020)

Gabriella Porcelli, General Counsel, Iveco Group (added 7 February 2022)

# PART C

## UNDERTAKING

## (TO BE PROVIDED BY INNER CONFIDENTIALITY RING MEMBERS)

In respect of any Inner Confidentiality Ring Information and/or Outer Confidentiality Ring Information disclosed to them pursuant to this Order, each Inner Confidentiality Ring Member undertakes that they will comply with the following requirements, to the extent applicable to them, in the terms below.

I, **[name]**, of **[company]** being [legal or other qualification or position] undertake to the Tribunal and each of the Parties, the Non Defendant Addressees and Scania as follows:

- 1. I have read a copy of the Tribunal's Order of and understand that Order and the implications of giving this undertaking.
- 2. I have read rule 31.22 of the Civil Procedure Rules and am aware of and will comply with the obligations imposed by the rule.
- 3. I will not disclose Inner Confidentiality Ring Information to any person who is not an Inner Confidentiality Ring Member (except to the extent that I am aware of the same information from another document that does not constitute "Confidential Information" and that was not obtained in breach of this undertaking or of the Tribunal's Order).
- 4. I will not disclose Outer Confidentiality Ring Information to any person who is not an Outer Confidentiality Ring Member (except to the extent that I am aware of the same information from another document that does not constitute "Confidential Information" and that was not obtained in breach of this undertaking or of the Tribunal's Order).
- 5. I will use the Confidential Information only for the purpose of these proceedings and for the purpose of no other current or future proceedings, dispute, complaint, or other use whatsoever in any jurisdiction (except to the extent that I am aware of the same information from another document that does not constitute "Confidential Information" and that was not obtained in breach of this undertaking or of the Tribunal's Order).
- 6. The documents containing any Inner Confidentiality Ring Information will remain in my custody or the custody of another Inner Confidentiality Ring Member at all times and be held in a manner appropriate to the circumstances so as to prevent unauthorised access.
- 7. The documents containing any Outer Confidentiality Ring Information will remain in my custody or the custody of another Outer Confidentiality Ring Member at all times and be held in a manner appropriate to the circumstances so as to prevent unauthorised access.
- 8. The production of further copies by me of the documents containing the Inner Confidentiality Ring Information shall be limited to those required for the use of the Inner Confidentiality Ring Members for the purposes of these proceedings only and such copies shall be held in accordance with paragraph 5 of this undertaking.
- 9. The production of further copies by me of the documents containing the Outer Confidentiality Ring Information shall be limited to those required for the use of the Outer

Confidentiality Ring Members for the purposes of these proceedings only and such copies shall be held in accordance with paragraph 5 of this undertaking.

10. Subject to the exceptions in paragraph 9.1 of the Order, and to the extent permitted by law, any and all copies of Confidential Information which are within my control will be securely disposed of insofar as is technologically possible or rendered inaccessible from any computer systems, disk or device, so that the Confidential Information is not readily available to any person at the conclusion of these proceedings.

Signed:

Name:

Date:

# PART D

## UNDERTAKING

## (TO BE PROVIDED BY OUTER CONFIDENTIALITY RING MEMBERS)

In respect of any Outer Confidentiality Ring Information disclosed to them pursuant to this Order, each Outer Confidentiality Ring Member undertakes that they will comply with the following requirements, to the extent applicable to them, in the terms below.

I, [name], of [company] being [legal or other qualification or position] undertake to the Tribunal and each of the Parties, the Non Defendant Addressees and Scania as follows:

- 1. I have read a copy of the Tribunal's Order of \_\_\_\_\_\_ and understand that Order and the implications of giving this undertaking.
- 2. I have read rule 31.22 of the Civil Procedure Rules and am aware of and will comply with the obligations imposed by the rule.
- 3. I will not disclose Outer Confidentiality Ring Information to any person who is not an Outer Confidentiality Ring Member (except to the extent that I am aware of the same information from another document that does not constitute "Confidential Information" and that was not obtained in breach of this undertaking or of the Tribunal's Order).
- 4. I will use the Outer Confidentiality Ring Information only for the purpose of these proceedings and for the purpose of no other current or future proceedings, dispute, complaint, or other use whatsoever in any jurisdiction (except to the extent that I am aware of the same information from another document that does not constitute "Confidential Information" and that was not obtained in breach of this undertaking or of the Tribunal's Order).
- 5. The documents containing any Outer Confidentiality Ring Information will remain in my custody or the custody of another Outer Confidentiality Ring Member at all times and be held in a manner appropriate to the circumstances so as to prevent unauthorised access.
- 6. The production of further copies by me of the documents containing the Outer Confidentiality Ring Information shall be limited to those required for the use of the Outer Confidentiality Ring Members for the purposes of these proceedings only and shall be held in accordance with paragraph 4 of this undertaking.
- 7. Subject to the exceptions in paragraph 9.1 of the Order, and to the extent permitted by law, any and all copies of Confidential Information which are within my control will be securely disposed of insofar as is technologically possible or rendered inaccessible from any computer systems, disk or device, so that the Confidential Information is not readily available to any person at the conclusion of these proceedings.

Signed:

Name:

Date: