



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

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) AKTIEBOLAGET VOLVO (PUBL)
(8) VOLVO LASTVAGNAR AB
(9) VOLVO GROUP TRUCKS CENTRAL EUROPE GMBH
(10) RENAULT TRUCKS SAS
(11) VOLVO GROUP UK LIMITED

Defendants

RE-RE-RE-AMENDED 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 the Tribunal directing that a further case management conference be listed to take place on 11 and 12 October 2021, to consider the appointment of experts, including whether the Defendants in the Proceedings and in the Ryder Proceedings shall be granted permission to appoint a joint expert to give evidence in these proceedings and the Ryder Proceedings on pass on and other issues consequential on any overcharge

IT IS ORDERED BY CONSENT THAT:

- 1A This Order replaces 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).
- 1B 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, and 4 December 2020 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 these 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 were granted access pursuant to the Notice to 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 “***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.
- 1.5 “***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:

- i. 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; and
- (b) documents such as:
- i. 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 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).

1.6 ***“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 or Part C of the Schedule to the Confidentiality Ring Orders dated 18 December 2018, 12 June 2019, 30 March 2020 or 4 December 2020 in these 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);
- (b) necessary secretarial and other support personnel (not including trainee solicitors or paralegals) under the supervision of those persons identified in (a) 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
- (c) 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) 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.

1.7 **“Other Claimant”** means any claimant in any of the Trucks Proceedings.

1.8 **“Non Defendant Addressees”** means any addressees of the Decision which are not parties to these proceedings.

1.9 **“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:

- i. 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:

- i. 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).

1.10 **“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 or Part D of the Schedule to the Confidentiality Ring Orders dated 18 December 2018, 12 June 2019, 30 March 2020 or 4 December 2020 in these

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);

- (c) necessary secretarial and other support personnel (not including trainee solicitors or paralegals) under the supervision of those persons identified in (b) 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
 - (d) 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) 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.
 - (e) **“Iveco Defendants”** means the twelfth to sixteenth defendants in the Ryder Proceedings.
 - (f) **“MAN Defendants”** means the first to fourth defendants in the Ryder Proceedings.
- 1.11 **“Party” or “Parties”** means a party to these proceedings, including (for the avoidance of doubt) any Part 20 Defendants.
- 1.11A **“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).
- 1.12 **‘Scania’** means Scania Aktiebolag, Scania CV Aktiebolag and Scania Deutschland GmbH.
- 1.13 **“these proceedings”** means the claim filed in the Chancery Division of the High Court of Justice on 15 December 2017 by the Claimants against the 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).
- 1.14 **“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); CAT Case 1291/5/7/18(T) (Ryder); and/or CAT Case 1293/5/7/18 (T) (Veolia).

INNER CONFIDENTIALITY RING INFORMATION

2. Inner Confidentiality Ring Information provided in the context of these proceedings (which includes where such information is provided for the purposes of an expert witness instructed in these proceedings and 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 these proceedings (which includes where such information is provided for the purposes of an expert witness instructed in these proceedings and 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 or by the Iveco Defendants or MAN Defendants other than via these proceedings (which includes where such information is provided for the purposes of an expert witness instructed in these proceedings and the Ryder Proceedings) under the terms of this Order.
- 4A 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 1.5(b) and 1.9(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.

- 4B 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 1.5(b) and 1.9(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.
- 4C For the purpose solely of the joint instruction by the Defendants and the defendants in the Ryder Proceedings of an expert to give evidence in these proceedings and the Ryder Proceedings on pass on and other issues consequential on any overcharge:
- a) the MAN Defendants and the Iveco Defendants are permitted to add external legal advisers and external experts as Inner Confidentiality Ring Members or Outer Confidentiality Ring Members in these proceedings, pursuant to paragraph 5 below; and
 - b) the Defendants are permitted to provide the Claimants' Confidential Information to the MAN Defendants and/or Iveco Defendants (within the parameters set out in this Order) and to discuss such information with them.

ADDITIONS TO THE INNER OR OUTER CONFIDENTIALITY RING

5. If a Party or the Iveco Defendants or MAN Defendants (the "**Proposing Party**") wishes to add an additional person as an Inner Confidentiality Ring Member or as an Outer Confidentiality Ring Member (which shall include, but shall not be limited to, any additional expert witness in respect of the Parties, and which shall be limited to external legal advisers and external experts in respect of the MAN Defendants and the Iveco Defendants):
 - 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, the Iveco Defendants and MAN Defendants 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 or the Iveco Defendants or MAN Defendants wishes to remove a person as an Inner Confidentiality Ring Member or an Outer Confidentiality Ring Member, that Party (or the Iveco Defendants or MAN Defendants) will notify the other Parties and the Iveco Defendants and MAN Defendants and provide an amended version of Part A or B (as appropriate) of the Schedule to this Order to the Tribunal, the Iveco Defendants and MAN Defendants and the other Parties. The Party (or the Iveco Defendants or MAN Defendants) 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.
- 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 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):
- (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 (a) above; and
 - (c) should the consent referred to in paragraph (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 (or Iveco Defendant or MAN Defendant) 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 (or Iveco Defendant or MAN Defendant) 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 (or Iveco Defendant or MAN Defendant) 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 –

(i) for Confidential Commission Documents disclosed pursuant to the order made further to the CMC on 21-22 November 2018 - 4pm on 21 December 2018; and

(ii) for all other Confidential Commission Documents – 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 (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 (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 and the Iveco Defendants and MAN Defendants 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 (or of the Iveco Defendants or MAN Defendants) 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' (or the Iveco Defendants or MAN Defendants') 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 (or the improperly disclosing Iveco Defendants or improperly disclosing MAN Defendants) 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 (or the improperly disclosing Iveco Defendants or improperly disclosing MAN Defendants) 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

11. If at any time any Confidential Information is made the subject of a court disclosure or 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 (or Iveco Defendant or MAN Defendant) 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 (or Iveco Defendant or MAN Defendant) 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 (or Iveco Defendant or MAN Defendant), and any of the Non Defendant Addressees and/or Scania may seek to enforce the terms of this Order.
13. There shall be liberty to apply, which shall be on notice to the other Parties, the Iveco Defendants and MAN Defendants, the Non Defendant Addressees and Scania.
14. The costs of compliance with and of drafting this Order shall be costs in the case.

NOTICES

15. 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), Quinn Emanuel Urquhart & Sullivan LLP, 90 High Holborn, London WC1V 6LJ (Ref. 06687/00001A/BB/NC/JWB) and Freshfields Bruckhaus Deringer LLP, 65 Fleet St, London EC4Y 1HT (Ref. 168213.0001 BCT/NJF).
- 15.2 Notices shall be addressed as follows:
 - (a) Notices for the 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

(b) Notices for the Defendants shall be marked for the attention of:

First to Fourth Defendants (DAF)

Email address: DafTrucksconfidentiality@traverssmith.com

Reference: Ref. D.4377.6/CFE

Seventh to Eleventh Defendants (Volvo/Renault)

Email address: [\\$VRT_Trucks_UK_Confidentiality@freshfields.com](mailto:$VRT_Trucks_UK_Confidentiality@freshfields.com)

Reference: 168213-0001 BCT/NF

Fifth to Sixth Defendants (Mercedes/Daimler)

Email address: QENeroConfidentiality@quinnemanuel.com

Reference: 06687/00001A/BB/NC/JWB

(c) Notices for the Non Defendant Addressees and the MAN Defendants and Iveco Defendants shall be sent to:

MAN Defendants

Email address: SM_MANTrucksConfidentiality@SlaughterandMay.com

Reference: DMT/HEW/NUA

Iveco Defendants

Email address: IvecoUKConfidentialityNotification@hsf.com

Reference: 30991611/4168/9100/11090

Kim.Dietzel@hsf.com

(d) Notices for Scania shall be marked for the attention of:

Email addresses: scaniatrucksukconfidentiality@allenoverly.com

This part contains the names of Inner Confidentiality Ring Members:

PART A

Claimants

Bryan Cave Leighton Paisner LLP

Andrew Hockley, Partner

Ed Coulson, Partner

Ben Blacklock, Senior Associate

Clare Reeve, Senior Associate

Sarah Ward, Senior Associate

Andrew Leitch, Associate

Nicholas Young, Associate

Graeme Thomas, Associate

Tonio Sadoni, Associate

Staffan Wegdell, Counsel

Sam Brown, Trainee Solicitor

Giulia Carloni, Trainee Solicitor

India Fahy, Trainee Solicitor

Daniel Swinburn, Senior Paralegal

Kaveh Lajmir, Senior Paralegal

Marieke Datema, Senior Lawyer Consultant

Anali Vega, Legal Clerk

Rory Collett, Trainee Solicitor (added on 8 February 2021)

Thomas Ren, Trainee Solicitor (added on 1 March 2021)

George Christodoulides, Trainee Solicitor (added on 1 March 2021)

Monckton Chambers

Tim Ward QC

Robert Palmer

Anneliese Blackwood

Will Hooper

Economic Insight

James Harvey, Director

Christopher Pickard, Senior Consultant

Madeleine Matos, Consultant

Nisha Thomas, Analyst

Eleanor Clutterbuck, Analyst

Khaldia Al Kasm, Analyst

Temple Translators

Elliot Cain, Group Sales Team Leader

Claudia Lewis, Production Team Leader

Natalie Corbett, Production Coordinator

Euan Onslow, Production Coordinator

Polly Pullen, Operations Coordinator

Hannah Minns, Translator

Elizabeth O'Loughlin, Translator

Rosalyn Munton, Translator

Alexander Simpson, Translator

Alice Kinnane, Translator

Monica Sandor, Translator

Tim Morgan, Translator

Laura Rekiaro, Translator

Hellen Mason-Spyry, Translator

Asya Sokirko, Translator

Sabine Mepstead, Translator

Simon Braun, Translator

Cuthbert Lovell, Translator

First to Fourth Defendants (DAF)

Travers Smith LLP

Caroline Edwards, Partner

~~Nigel Seay, Partner (removed 29 January 2019)~~

Anne Foster, Consultant

Angela Taylor, Senior Counsel

Rachel Wilson, Senior Associate

~~Paul McComb, Senior Associate (removed 29 January 2019)~~

Joseph Moore, Senior Associate

~~Sam Wilson, Senior Associate~~ (removed 30 January 2020)
James Hulmes, Senior Associate
Rachel Kitchman, Senior Associate
~~Anchal Kapur, Associate~~ (added 30 January 2020)
Edward Hardman, Associate
Philippe Lopeman, Associate
Tim Knight, Associate
Lauren Clark-Hughes, Associate
Michelle Anderson, Associate
Charlotte Angwin, Associate
~~Thomas Davies, Trainee Solicitor~~ (removed 06 March 2019)
~~Sam Van Besouw, Trainee Solicitor~~ (removed 06 March 2019)
~~Mahdi Siddique, Paralegal~~ (removed 02 August 2019)
~~Joseph Gaffney, Paralegal~~ (removed 02 August 2019)
~~Marguerite Casanova, Paralegal~~ (removed on 19 June 2019)
~~Hessel Rooleveld, Paralegal~~ (removed 29 August 2019)
~~Jack Redrup, Paralegal~~ (removed on 19 July 2019)
~~Lucy Briggs, Paralegal~~ (removed on 3 July 2019)
Huw Jenkin, Partner (added 30 January 2019)
Laura McCann, Associate (added 30 January 2019)
~~Cameron Mills, Associate~~ (added on 30 January 2019) (removed 30 August 2019)
Tom Caldwell, Associate (added 30 January 2019)
Maya Chandegra, Associate (added 30 January 2019)
Cormac Toomey, Senior Associate (added on 06 March 2019)
Imogen Nolan, Associate (added on 06 March 2019)
~~Lydia Williams, Trainee Solicitor~~ (added on 06 March 2019) (removed 30 August 2019)
~~Anastasia Rostron, Trainee Solicitor~~ (added on 06 March 2019) (removed 30 August 2019)
~~Inge Swiegers, Trainee Solicitor~~ (added on 06 March 2019) (removed 30 August 2019)
~~Sam Cottman, Senior Counsel~~ (added on 23 May 2019) (removed 2 March 2020)
~~Matthew Shannon, Paralegal~~ (added on 28 June 2019) (removed 23 March 2021)
~~Caitlin Coady, Paralegal~~ (added on 28 June 2019) (removed 16 June 2020)
~~John Hadfield, Paralegal~~ (added on 28 June 2019) (removed 23 March 2021)
~~Nicole Clerk, Paralegal~~ (added on 3 July 2019) (removed 22 October 2019)
Adam Short, Senior Associate (added on 10 July 2019)
~~Tara Lewis, Associate~~ (added on 24 July 2019) (removed 23 March 2021)

~~Neeraj Melwani, Paralegal (added 31 July 2019) (removed 23 March 2021)~~
~~Joseph Mahon, Paralegal (added 21 August 2019) (removed 23 March 2021)~~
~~Isabel Cridland, Trainee (added 4 September 2019) (removed 2 March 2020)~~
~~Jack James Ball, Trainee (added 4 September 2019) (removed 2 March 2020)~~
~~James Humphrey, Trainee (added 4 September 2019) (removed 2 March 2020)~~
~~Alistair Connor, Paralegal (added 22 October 2019)~~
(removed 7 August 2020)
~~Dan Ursu, Trainee Solicitor (added 2 March 2020) (removed 23 March 2021)~~
~~Chloe Budd, Trainee Solicitor (added 2 March 2020) (removed 23 March 2021)~~
~~Natalie Batra, Trainee Solicitor (added 6 March 2020) (removed 23 March 2021)~~
Shreeya Ranchhod, Paralegal (added 15 June 2020)
Seaghan Davey, Paralegal (added 1 July 2020)
~~Peter Eaton, Paralegal (added 7 August 2020) (removed 18 June 2021)~~
Madeleine Parker, Associate (added 25 August 2020)
~~Siân Whitby, Trainee Solicitor (added 9 September 2020) (removed 18 June 2021)~~
~~Kasope Sonola, Trainee Solicitor (added 9 September 2020) (removed 18 June 2021)~~
Harriet Lawrence, Associate (added 15 September 2020)
Victoria Green, Associate (added 15 December 2020)
Fran Lawrenson, Associate (added 15 September 2020)
Adam Bristow, 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)
Ellie Horder, Associate (added 29 January 2021)
Adam North, Paralegal (added 29 January 2021)
Niall Fitzpatrick, Paralegal (added 29 January 2021)
Alice Stephens, Paralegal (added 15 February 2021)
Amrik Bains, Paralegal (added 15 February 2021)
Adam Bradley, Associate (added 24 February 2021)
Emma Gittings, Trainee Solicitor (added 26 February 2021)
Peter Borland, Trainee Solicitor (added 26 February 2021)
Christian Greenhill-Hooper, Trainee Solicitor (added 26 February 2021)
Laura Hagedorn (added 10 March 2021)
Tim Drok, Senior Associate (added 23 March 2021)

Manasa Shanker, Associate (added 23 March 2021)
Alyce Lynch, Associate (added 23 March 2021)
Matthew Sumpton, Associate (added 23 March 2021)
Jack Woods, Paralegal (added 13 April 2021)
Stephanie Baptist, Paralegal (added 19 April 2021)
Aimée Mullan, Paralegal (added 18 June 2021)
Rianna Ragbir, Paralegal (added 30 June 2021)
Jacob Miller, Paralegal (added 13 July 2021)
Samuel Winter, Paralegal (added 13 July 2021)

Monckton Chambers

Daniel Beard QC
Meredith Pickford QC
Rob Williams
Nikolaus Grubeck
Daisy Mackersie
James Bourke
David Gregory
Thomas Sebastian (added 02 May 2019)
Azeem Suterwalla (added 22 July 2019)

Compass Lexecon

Damien Neven, Senior Consultant
Enrique Andreu, Senior Vice President
Julian Delamer, Senior Vice President
Roberto Venturini, Economist
~~Siewerd Gaastra, Economist (removed 29 March 2019)~~
Vladimir Tsimaylo, Senior Analyst
Marcin Pruski, Economist
~~Alan Rozenberg, Vice President (removed 23 May 2019)~~
Daniel Westrik, Economist
Laura Napolitano, Analyst
Laureen de Barsy, Analyst (added 01 March 2019)
Daniel Coublucq, Vice President (added 14 October 2019)
Ian Small, Senior Vice President (added 30 October 2019)

Benjamin Roux, Vice President (added 15/01/2021)
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 Tonerre, Senior Analyst (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)

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 2019)
Jack Hughes, Consultant (added 06 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)

De Brauw Blackstone Westbroek N.V.

Jolling de Pree, Partner
Berto Winters, Partner
Machteld de Monchy, Partner

Tilly-Alberga Smits, Senior Associate
Kees Saarloos, Senior Associate
~~Stephanie The, Senior Associate (removed 29 March 2019)~~
~~Lizette van Loon, Senior Associate (removed on 19 June 2019)~~
~~Samantha Brinkhuis, Senior Associate (removed on 19 June 2019)~~
Zeynep Ortac, Senior Associate
Tim van den Meijdenberg, Associate
Evija Butane, Associate
Arne Munch, Senior Associate
Georgiana Mirza, Associate
~~Salima Guettache, Associate (removed on 19 June 2019)~~
~~Wouter Jan Leys, Associate (removed 7 August 2020)~~
Aylin Gayibli, Associate
Paul Post, Associate
~~Clio Zois, Associate (removed on 19 June 2019)~~
Vivian van Weperen, Associate
Femke Kolff-Otten, Contract Lawyer a.i.
~~Junior Serrano, Legal Project Manager (removed 29 March 2019)~~
Tiana Danielle Xavier, Associate (added 15 February 2019)
Mira Smulders, Senior Associate (added 15 February 2019)
Agnieszka Bartlomiejczyk, Associate (added 12 April 2019)
Justyna Niemczyk, Associate (added 12 April 2019)
James Wang, Senior Associate (added on 24 May 2019)
Iuliia Samsonova, Associate (added 28 June 2019)
Laura de Vries, Associate (added 28 June 2019)
Judy Jordaan, Contract Lawyer (ad interim) (added 10 October 2019)
Begüm Nisli, Senior Associate (added 19 December 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, Law Assistant (added 22 January 2021)

Fifth to Sixth Defendants (Mercedes/Daimler)

Quinn Emanuel Urquhart & Sullivan LLP

Boris Bronfentrinker, Partner

Nicola Chesaites, Of Counsel

Maria Campbell, Senior Associate

Cordelia Rayner, Senior Associate

James McSweeney, Associate

Laura Abram, Associate

~~Ji-Whan Bang, Associate~~

Nabil Khabirpour, Associate

~~Rachel Tompkins, Associate~~

~~Anna Kullmann, Associate~~

Hannah Dixie, Associate

~~Lucy Caton, Paralegal (removed 20 January 2020)~~

Kerry Hanley, Paralegal (added 21 January 2019)

~~Serife Mapp, Contract Attorney (added 23 April 2019)~~

~~Ruy Buchholz, Contract Attorney (added 23 April 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)

~~Adam Gierrek, Contract Attorney (added 4 November 2019)~~

~~Nadia Brady, Contract Attorney (added 4 November 2019)~~

~~Christian Rabe, Contract Attorney (added 4 November 2019)~~

~~Rudiger Proske, Contract Attorney (added 4 November 2019)~~

~~Karthic Kukathasan, Contract Attorney (added 4 November 2019)~~

~~Konstantina Perifanou, Paralegal (added 26 November 2019) (removed 20 March 2020)~~

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)

Gleiss Lutz Hootz Hirsch PartmbB Rechtsanwälte

Dr Ulrich Denzel, Partner

Dr Johannes Hertfelder, Associated Partner

~~Daniela Mariotti, Associate (removed 4 June 2019)~~

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)

Monckton Chambers

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

~~Benedikt Flügel, Economist (removed 3 June 2021)~~

Thomas Nau, Economist (added 11 December 2019)

Jan Christopher Rönn, Economist (added 11 December 2019)

Juri Simons, Economist (added 11 December 2019)

~~Wiktor Owezarsz, Economist (removed 3 June 2021)~~

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)

EFS Unternehmensberatung Gesellschaft m.b.H.

Dr. Klaus Atzwanger, Partner

Wolfgang Suttner, Senior Expert

~~Melanie Gnam, Senior Consultant~~ (removed 3 June 2021)

Georg Klanfar, Project Manager

Benedikt Wohlmuth, Account Manager (added 25 January 2021)

Maja Mandic, Consultant (added 25 January 2021)

Cengiz Karacam, Data Analyst (added 25 January 2021)

~~Rafael Huzar, Data Analyst~~ (removed 3 June 2021)

Flora Wiercimak, Consultant (added 25 January 2021)

Jittawilai Jiyavorananda, Consultant (added 25 January 2021)

AlixPartners LLP

Andrew Grantham, Managing Director

Greg Huitson-Little, Director

~~Natalie Taplin, Senior Consultant~~ (removed 3 June 2021)

Camelia O'Brien, Consultant

~~Luiz Secco, Consultant~~ (removed 3 June 2021)

Mat Hughes, Managing Director

Martin Lewis, Non-Executive Director (added 31 May 2019)

~~Jonathan Matthews, Employee~~ (removed 3 June 2021)

Peter Wright, Senior Vice President (added 4 February 2020)

Scott Beattie, Director (added 4 February 2020)

Anne-Marie Hitchen, Senior Vice President (added 3 June 2021)

Marc Morgan, Vice President (added 4 February 2020)

Wen Fen Chong, Vice President (added 4 February 2020)

~~Elena Edwards, Consultant~~ (removed 3 June 2021)

Tom Millar, Consultant (added 4 February 2020)

Sven Hoeling, Employee (added 11 May 2020)

Samantha Bainbridge, Employee (added 11 May 2020)

Charlotte Halls, Employee (added 4 June 2020)

Sarah Rodin, Vice President (added 3 June 2021)

Jack Peters, Consultant (added 25 June 2021)

Seventh to Eleventh Defendants (Volvo/Renault)

Freshfields Bruckhaus Deringer LLP

Bea Tormey, Partner

Nicholas Frey, Partner

Ricky Versteeg, Counsel

~~Sam Hiebendaal, Senior Associate (removed 26 February 2020)~~

Daniel Hunt, Senior Associate

Alexandra Malina, Senior Associate

Ingrid Rois, Senior Associate

~~Amy Rawson, Associate (removed 31 January 2019)~~

~~Anthony Ojukwu, Associate (removed 15 September 2020)~~

Angus Reston, Associate

~~Glenn Kembrey, Associate (removed 29 January 2020)~~

Haris Ismail, Associate

Johanna McDavitt, Associate

Alexandra Holroyd, Associate (added 31 January 2019)

~~Maya Nirula, Trainee Solicitor (removed 4 March 2019)~~

~~Sheridan Jones, Trainee Solicitor (removed 4 March 2019)~~

~~Hannah Short, Trainee Solicitor (removed 4 March 2019)~~

~~Hannah Bergin, Trainee Solicitor (removed 5 June 2019)~~

~~Tom Byham, Trainee Solicitor (removed 5 June 2019)~~

~~Jonas Levermann, Trainee Solicitor (removed 5 June 2019)~~

Gavin Burke, Senior Paralegal

Megan McDonagh, Paralegal

~~Josephina Kern, Paralegal (added 31 January 2019) (removed 14 March 2019)~~

~~Jonathan Pagan, Senior Associate (added 14 March 2019) (removed 15 September 2020)~~

~~Anna Avallone, Paralegal (added 14 March 2019) (removed 08 March 2021)~~

Xander Friedlaender, Associate (added 4 April 2019)

~~Anna Brennan, Associate (added 4 April 2019) (removed 15 September 2020)~~

Natalie Keir, Associate (added 4 April 2019)

~~Rachel Breen, Trainee Solicitor (added 31 May 2019) (removed 04 September 2019)~~

~~Tamara Ostrowiecki, Trainee Solicitor (added 31 May 2019) (removed 04 September 2019)~~

~~Shang Koh, Trainee Solicitor (added 31 May 2019) (removed 04 September 2019)~~

Nouné Padarian, Paralegal (added 24 June 2019)

Rose Goss, Associate (added 26 June 2019)

~~Tegan Harrington, Associate (added 25 July 2019) (removed 2 June 2021)~~

Amali Pitigala, Paralegal (added 09 August 2019)

~~Laura Brimelow, Legal Solutions Manager (added 09 August 2019) (removed 22 April 2021)~~

Niamh Lofthouse, Senior Legal Solutions Specialist (added 09 August 2019)

Kai Ho Lam, Legal Solutions Specialist (added 09 August 2019)

~~Adepeju Alimot Adewumi, Legal Solutions Specialist (added 09 August 2019) (removed 20 November 2019)~~

~~Maxime Aumaitre, Legal Solutions Specialist (added 09 August 2019) (removed 20 November 2019)~~

~~Azharul Islam, Legal Solutions Specialist (added 09 August 2019) (removed 22 April 2021)~~

~~Humera Patel, Legal Solutions Specialist (added 09 August 2019) (removed 19 February 2020)~~

~~Alexandra Forrest, Trainee (added 02 September 2019) (removed 16 December 2019)~~

~~Anup Nandra, Trainee (added 02 September 2019) (removed 16 December 2019)~~

~~Xanthia Hargreaves, Trainee (added 02 September 2019) (removed 16 December 2019)~~

Charlotte Best, Associate (added 09 October 2019)

Adrian Wright, Associate (added 09 October 2019)

~~Tiffanie Fung, Associate (added 25 October 2019) (removed 4 May 2021)~~

Campbell Herbert, Associate (added 25 October 2019)

~~Joseph Mason, Trainee Solicitor (added 5 November 2019) (removed 19 March 2020)~~

Jan-Henning Buschfeld, Principal Associate (added 20 November 2019)

~~Lucy Peckham, Trainee Solicitor (added 29 November 2019) (removed 17 March 2020)~~

~~Kiran Iqbal, Trainee Solicitor (added 29 November 2019) (removed 17 March 2020)~~

~~Jonny Oldfield, Trainee Solicitor (added 29 November 2019) (removed 17 March 2020)~~

Paul Abbott, Senior Associate (added 29 January 2020)

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

~~Lara Hall, Senior Associate (added 11 February 2020) (removed 30 November 2020)~~

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

~~Rebecca Burns, Associate (on secondment from Corrs Chambers Westgarth) (added 19 February 2020) (removed 20 February 2021)~~

~~Isolde Hill, Trainee Solicitor (added 26 February 2020) (removed 15 September 2020)~~

~~Sanjana Canumalla, Trainee Solicitor (added 26 February 2020) (removed 3 June 2020)~~

~~Rebecca Withey, Trainee Solicitor (added 26 February 2020) (removed 3 June 2020)~~

~~Katie Schwarzmann, Trainee Solicitor (added 26 February 2020) (removed 3 June 2020)~~

~~Jacob Bullock, Trainee Solicitor (added 26 February 2020) (removed 3 June 2020)~~

~~Natalie Puddicombe, Associate (added 17 March 2020) (removed 21 January 2021)~~
~~Justin Tang, Trainee Solicitor (added 19 March 2020) (removed 7 October 2020)~~
~~Matthew Yarwood, Legal Solutions Manager (added 17 April 2020) (removed 11 May 2020)~~
Abigail Legge, Associate (added 27 April 2020)
~~Teodora Nistor, Legal Solutions Manager (added 11 May 2020) (removed 21 January 2021)~~
~~Amy Sanderson, Trainee Solicitor (added 3 June 2020) (removed 15 September 2020)~~
~~Rachael Evans, Trainee Solicitor (added 3 June 2020) (removed 15 September 2020)~~
~~Rebecca Zard, Trainee Solicitor (added 3 June 2020) (removed 15 September 2020)~~
~~Yannis Karakitsios, Trainee Solicitor (added 3 June 2020) (removed 15 September 2020)~~
~~Laura Trigg, Trainee Solicitor (added 3 September 2020) (removed 17 December 2020)~~
~~Edward Ellis, Trainee Solicitor (added 3 September 2020) (removed 17 December 2020)~~
~~Tara Ahluwalia, Trainee Solicitor (added 3 September 2020) (removed 17 December 2020)~~
~~George Whittingham, Trainee Solicitor (added 3 September 2020) (removed 17 December 2020)~~
~~Ellie Mirchandani, Trainee Solicitor (added 15 September 2020) (removed 17 December 2020)~~
Sarah Holland, Associate (added 7 October 2020)
Lydia Ream, Associate (added 7 October 2020)
~~Florence Powell, Associate (added 7 October 2020) (removed 10 February 2021)~~
Emma Probyn, Senior Associate (added 7 October 2020)
Adrian Almasan, Legal Solutions Specialist (added 30 November 2020)
~~Katherine Dudman, Trainee Solicitor (added 3 December 2020) (removed 08 March 2021)~~
~~Peter Kerr-Davis, Trainee Solicitor (added 3 December 2020) (removed 08 March 2021)~~
~~Serena Chang, Trainee Solicitor (added 3 December 2020) (removed 08 March 2021)~~
~~Jonas Zenger, Trainee Solicitor (added 3 December 2020) (removed 08 March 2021)~~
Charlotte Cullen, Legal Solutions Manager (added 21 January 2021)
Pippa Walker, Legal Solutions Specialist (added 10 February 2021)
~~Anika Prasad, Trainee Solicitor (added 23 February 2021) (removed 9 June 2021)~~
~~Tiffany Hui, Trainee Solicitor (added 23 February 2021) (removed 9 June 2021)~~
~~Emma Kemsley Pein, Trainee Solicitor (added 23 February 2021) (removed 9 June 2021)~~
~~Alisha Wright, Trainee Solicitor (added 23 February 2021) (removed 9 June 2021)~~
~~Bosco Yu, Trainee Solicitor (added 23 February 2021) (removed 9 June 2021)~~
Harriet Maes (née Dykes), Associate (added 8 March 2021)
Rachel Breen, Associate (added 8 March 2021)
Rebecca Withey, Associate (added 8 March 2021)

Massimiliano Bonifacino, Legal Solutions Specialist (added 8 March 2021)
Zulihat Kareem, Legal Solutions Specialist (added 8 March 2021)
Danya Rahuma, Legal Solutions Specialist (added 8 March 2021)
~~Alexandra Lazell, Trainee Solicitor (added 22 March 2021)~~ (removed 9 June 2021)
Jordan Gulwell, Senior Legal Solutions Specialist (added 14 May 2021)
Emily McDaid, Legal Solutions Specialist (added 14 May 2021)
Caroline Ellard, Associate (added 2 June 2021)
Saif Gilani, Trainee Solicitor (added 2 June 2021)
Cesar Manivet, Trainee Solicitor (added 2 June 2021)
Alyssa White, Trainee Solicitor (added 2 June 2021)
Emma Franck-Gwinnell, Trainee Solicitor (added 2 June 2021)
Sarah Mitchell, Trainee Solicitor (added 2 June 2021)
Kelley Macpherson, Trainee Solicitor (added 2 June 2021)
Alexandra Hilberer, Paralegal (added 24 June 2021)

Contrast

Frank Wijckmans, Partner
Maaïke Visser, Counsel
Karolien Francken, Associate
Monique Sengelov, Associate
Lise Ryckaert, Paralegal
Charlotte Cavanagh, Paralegal (added 25 July 2019)

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)

Frontier Economics

Zoltan Biro, Director (added 31 January 2019)

Chris Newton, Associate Director (added 31 January 2019)

Fraser Davison, Manager (added 31 January 2019)

~~Robert Bowdery, Consultant~~ (removed 16 December 2019)

Peter Northall, Consultant (added 23 April 2019)

Adam Laphorn, Consultant (added 23 April 2019)

~~Lyu Georgiev, Consultant~~ (added 23 April 2019) (removed 18 June 2020)

Callum Cheshire, 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)

Katherine Bolger, Consultant (added 18 December 2019)

Viktoriya Peycheva, Consultant (added 18 December 2019)

Michael Naylor-Smith, Analyst (added 18 December 2019)

~~Jed Fletcher, Analyst~~ (added 18 December 2019) (18 June 2020)

~~Amber Dale, Analyst~~ (added 18 December 2019) (removed 7 October 2020)

~~Priyanka Roychoudhury, Analyst~~ (added 18 December 2019) (removed 7 October 2020)

~~Agnieszka Madyeka, Intern~~ (added 18 December 2019) (removed 18 June 2020)

~~Alex Katz, Analyst~~ (added 16 January 2020) (removed 18 June 2020)

~~Thomas Badger, Analyst~~ (added 16 January 2020) (removed 18 June 2020)

~~Sonia Razi, Analyst~~ (added 16 January 2020) (removed 3 December 2020)

~~Vladislava Bar-Katz, Consultant~~ (added 16 January 2020) (removed 18 June 2020)

~~Hélène Roth, Consultant~~ (added 16 January 2020) (removed 18 June 2020)

~~Hayley Toms, Consultant~~ (added 16 January 2020) (removed 22 April 2021)

~~Ivana Kocanova, Data Scientist~~ (added 16 January 2020) (removed 7 October 2020)

Mumtad Choudhury, Project Manager (added 16 January 2020)

~~Margherita Ferrara, Analyst~~ (added 19 February 2020) (removed 3 December 2020)

~~Theres Lessing, Analyst~~ (added 19 February 2020) (removed 3 December 2020)

Maximiliane Reger, Consultant (added 18 June 2020)

~~Hugo Wolters, Analyst~~ (added 18 June 2020) (removed 7 October 2020)

Jakob Hinger, Analyst (added 18 June 2020)

~~Rahul Mistry, Intern~~ (added 18 June 2020) (removed 7 October 2020)

~~Istvan Barati, Intern~~ (added 18 June 2020) (removed 7 October 2020)

Josefa Knippers, Analyst (added 23 July 2020)

Moritz Absenger, Analyst (added 23 July 2020)

Will Carpenter, Analyst (added 15 October 2020)

Philippe Majerus, Analyst Analyst (added 15 October 2020)
Franziska Krug, Analyst (added 15 October 2020)
~~Mattania Grousseau, Intern (added 15 October 2020) (removed 22 April 2021)~~
~~Thomas Bentze, Intern (added 15 October 2020) (removed 22 April 2021)~~
fPrarthana Prabhakar, Consultant (added 17 November 2020)
Sarah Pennington, Consultant (added 17 November 2020)
Harry Masters, Analyst (added 17 November 2020)
Cosimo Paulucci, Analyst (added 17 November 2020)
Scarlett Reeves, Analyst (added 17 November 2020)
~~Michael Eldar, Analyst (added 17 November 2020) (removed 22 April 2021)~~
Raphael Flore, Analyst (added 17 November 2020)
~~Vedika Singhania, Analyst (added 17 November 2020) (removed 22 April 2021)~~
Henning Sökeland, Analyst (added 30 November 2020)
~~Tega Akati Udi, Analyst (added 30 November 2020) (removed 22 April 2021)~~
Sumaiya Rahman, Analyst (added 30 November 2020)
Judy Wang, Analyst (added 30 November 2020)
Robert Bowdery, Consultant (added 3 December 2020)
Fabrizio Vaasselli, Consultant (added 3 December 2020)
Leda Pateli, Consultant (added 19 February 2021)
Leo Feilden, Consultant (added 19 February 2021)
Paula Balina Vieites, Analyst (added 19 February 2021)
Marta Torrens Tomey, Analyst (added 22 April 2021)
Edoardo Badii, Analyst (added 22 April 2021)
Riccardo Barnard, Analyst (added 22 April 2021)
Joshua Hia, Data Scientist (added 22 April 2021)
Pauline Bertino, Consultant (added 4 May 2021)
Greg Wilkinson, Consultant (added 4 May 2021)
Romain Defoort, Consultant (added 4 May 2021)
Dario van der Linden, Analyst (added 4 May 2021)
Ammar Malik, Consultant (added 2 June 2021)
Chiara Riviera, Consultant (added 2 June 2021)
Fabian Schrogl, Analyst (added 2 June 2021)
Shazz Lalwani, Analyst (added 2 June 2021)
Maximilian Zillner, Consultant (added 9 June 2021)
Harry Davies, Analyst (added 9 June 2021)

Filip Lurka, Analyst (added 24 June 2021)
Michael Zelenka, Analyst (added 24 June 2021)
Sonam Billan, Intern (added 24 June 2021)
Bianca Montironi, Intern (added 24 June 2021)

Eversheds Sutherland

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

MAN

Slaughter and May

Richard Swallow, Partner
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Holly Ware, Partner
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Antonia Tjong, Associate
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Nicholas Quirke, Associate
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Roberto Worthington, Evidence and Operations Manager
Nicholas Lee, Associate
Edmund Berney, Trainee Solicitor
James Edwards, Trainee Solicitor
Heather Crosby, Trainee Solicitor
Emily Boseley, Trainee Solicitor
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Matthew Crilly, Trainee Solicitor
Madison Vincent, Trainee Solicitor
Bianca Pereira, Trainee Solicitor

Margot Speed, Trainee Solicitor
Harriet Saunders, Associate
Jeremy Barnett, Paralegal
Max Rayner, Paralegal
Emmanuelle Beaumes, Paralegal
Tiffany Chan, Associate
Lucy Chambers, Associate
Hajra Rehman
Adam Waring, Trainee Solicitor
Alex Charlton-Jones, Trainee Solicitor
Patrick Kenny, Trainee Solicitor
Tabitha Brown, Trainee Solicitor
Eleanor Healy-Birt, Associate
Nick Ames, Associate
Sophia Tarsounas, Trainee Solicitor
Jake Richardson, Trainee Solicitor
Jardelle Johnson, Trainee Solicitor
Margaret Polk, Trainee Solicitor
Remi Pfister, Trainee Solicitor
Raza Nazar, Associate
Jonathan Clark, Partner
Yan Lai, Trainee Solicitor
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Esme Malley, Paralegal
Marinella Di Bari, Contract Lawyer
Oscar Martinez, Contract Lawyer
Vitor Castro, Contract Lawyer

Hengeler Mueller

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Sarah Milde, Senior Associate
Thorsten Maeger, Partner
Lea Kristina Cleophas, Associate

Aenne Tetz, Associate
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Luisa Kuschel, Senior Associate
Philipp Kanzow, Associate
Irene Rodenstock
Caroline Madeleine Beyersdorf, Associate
Clara Lütgerath, Associate
Martina Aleksandrova, Associate

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Daniel Jowell QC, Counsel
Tom Pascoe, Counsel
David Bailey, Counsel
Jonathan Scott, Barrister

Compass Lexecon

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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
Florian Mfockel, Economist
Tristan Salmon, Senior Analyst
Janani Dhileepan, Analyst
Sebastien Grotto, Analyst
Marion Chabrost, Economist
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Kristi Dode, Analyst
Gwilhem Charbonnier, Economist
Arpita Pattanaik, Analyst
Manuel Frewer, Analyst
Lau Nilhausen, Senior Vice President
Daniel Ball, Research Analyst
Mara Siegesmund, Analyst
Inés Noval Felgueroso, Analyst
Kuljeetsinh Nimbalkar, Analyst
Pasindhu Mawalage, Research Analyst
Theresa Ng'andu, Research Analyst

FTI Consulting

Navin Waghe, Senior Managing Director
Matt Burder, Senior Director
Nick Leese, Director
Thomas Maassen, Senior Consultant
Connor Gower, Consultant
Andrew Hine, Consultant
Genna Aldridge, Director
Katherine Glennie-Soares, Consultant
Kean Seeger, Consultant
Adeline Sou, Consultant
Josie Davies, Consultant
Matthew Burt, Senior Consultant
Corinne Rogers, Consultant
Fred Hudson, Consultant

Iveco

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Gregg Rowan, Partner
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Daniel Woods, Senior Associate
Christon Shenolikar, Senior Associate

James White, Senior Associate
Stephen Thomson, Senior Associate
Gerarda Morton, Legal Manager
Catherine Muir, Senior Former Practising Barrister
John Cagan, Paralegal
Nikita Davé, Associate
James Farrell, Partner
Antonia Brindle, Associate
Jane Johnston, Senior Legal Analyst
Daniel May, Senior Associate
Mairead Connolly, Solicitor (Northern Ireland)
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Olivia Walton, Senior Associate
Helen Bignall, Of Counsel
Naomi Reid, Associate
Rebekah Dixon, Senior Associate
Alfredo De Stefano, Paralegal
Saima Zafar, Paralegal
Ramya Veerabathran, Associate
Jerome Temme, Associate
Ben Phillips, Associate
Linet Kurian, Trainee Solicitor
Ina Metko, Associate
Annika Gante, Associate
Nikolaus Moench, Associate
Caora Mackell, Trainee Solicitor
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Andrew North, Of Counsel
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Niall Kennedy, Senior Solicitor (Northern Ireland)
Joe Moorcroft-Moran, Associate

Patrick O'Connor, Legal Analyst
Suzanne Campbell, Of Counsel
Shula Parry, Associate
Kabir Hosein, Trainee Solicitor
Ritwik Bhattacharya, Graduate Solicitor
Sabesh Asokan, Trainee Solicitor
Leon Culot, Trainee Solicitor
Corinna Cherie, Trainee Solicitor
Alice Murphy, Trainee Solicitor
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Marie Becker, Associate
Alexander O'Connell-Danes, Associate
David O'Neill, Associate (Employed Barrister)

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Brick Court Chambers

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Matthew Kennedy
Aaron Khan
Charles Hollander QC

Compass Lexecon

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Michele Avagliano
Ming Yu Wong
Kristofer Hammarback
Gytautas Karklius
Andy Parkinson
Laura Rovegno
Jin Kiat Tan
Balram Sennik

Simon Collis, Analyst
Alan Rozenberg, Vice President
Harry Gosling, Analyst
James Wong, Senior Analyst
Rebecca Reichert, Analyst
Aric Chau, Research Analyst
Emmet Lenoach, Research Analyst
Laura Phaff, Vice President
Mallika Arora, Economist
Choo Zhixin (known as Verdi Choo), Senior Analyst
Vivien Csonka, Senior Analyst
Hiranmayee Rajan, Analyst
Gonçalo Manuel Dinis Da Silva Gomes, Research Analyst
James Forster, Analyst
Kadambari Prasad, Senior Economist
Sasha Guest, Research Analyst
Ziyue Yang, Analyst
Noorah Al Faris, Analyst
Xiaoshi Shi, Analyst
Anisa Kabir, Senior Analyst
Lars Martinez Ridley, Intern
Giovanni Pierdomenico, Intern
Paolo Lozza, Intern
Josep Peya, Senior Analyst
Joshua Jun Heng Phoon, Analyst
Muxing Webster Zhou, Research Analyst
Sara Sorbini, Research Analyst
Sara Vojvodic, Senior Analyst
Zsolt Hegyesi, Analyst
Sean Lavender, Research Analyst
James Andrews, Economist
Joseph Simpson, Analyst
Shikha Bhaskar, Analyst
Cindy Nah, Economist
Kah Loon Tham, Analyst

Gianluca Strada, Analyst

Chiara Gilardi, Research Analyst

Tanya Patil, Intern

Alberto Minghetti, Intern

FTI Consulting LLP

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Andrew Green, Managing Director

Alistair Winning, Managing Director

Morgan Clement, Senior Director

Ying Lai, Associate

Timothy Gardiner, Senior Director

Mike Pilgrem, Senior Managing Director

Timothy Richards, Director

Mark Putney, Director

Buuruljin Enkhbold, Senior Consultant

Euan Philip, Senior Consultant

William Locke, Consultant

Zain Faheem, Consultant

Callum Cooper, Consultant

Amber Standish, Consultant

This part contains names of Outer Confidentiality Ring Members (excluding Outer Confidentiality Ring Members who are also Inner Confidentiality Ring Members):

PART B

Claimants

Dawsongroup plc

Steve Miller, Group Chief Executive

Tony Coleman, Group Finance Executive

Richard Bulmer, Group Legal Manager

First to Fourth Defendants (DAF)

PACCAR Inc

~~Doug Grandstaff, General Counsel~~ (removed 7 August 2020)

Harrie Schippers, Chief Financial Officer and Executive Vice President

Michael Walton, General Counsel (added 10 September 2020)

DAF Trucks N.V

Harry Wolters, President

~~Marjon Ijpelaar, Legal Department~~ (removed 7 August 2020)

Nico den Houting, Project Manager for Civil Litigation

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

Sanne Boullart, Assistant Project Manager for Civil Litigation (added on 06 March 2019)

~~Willem-Jan Wieland, Senior Legal Counsel~~ (added on 12 April 2019) (removed 7 August 2020)

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)

DAF Trucks Limited

Robin Easton, Managing Director

DAF Trucks N.V

Duco Zoomer, General Counsel

~~Roebij Tjemkes, Senior Legal Counsel~~ (removed on 19 June 2019)

Fifth to Sixth Defendants (Mercedes/Daimler)

Daimler AG

Thomas Laubert, Vice President and Group General Counsel

Florian Adt, Associate General Counsel

~~Jan Philipp Komossa, Senior Legal Counsel (removed 20 March 2020)~~

Steffen Scherer, Senior Legal Counsel

Ute Pazer, Senior Legal Counsel

~~Sung Kyung Yi, Legal Counsel (removed 1 July 2020)~~

Miklos Mudrony, Legal Counsel

~~Mai Britt Cordt, Legal Counsel (removed 4 February 2020)~~

Dietrich Müller, Senior Manager Sales & Marketing

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)

Yvonne Herr, Legal Counsel (added 20 January 2020)

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

Britta Abeshaus, Legal Counsel (added 20 March 2020)

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

Seventh to Eleventh Defendants (Volvo/Renault)

Kelda Groves, Head of Litigation, UK and Europe, AB Volvo (publ)

~~Nina Aresund, Senior Vice President Corporate Legal, AB Volvo (publ)~~

Susanne Jannesson, Corporate Legal Counsel, AB Volvo (publ)

Ross Goodrich, Corporate Litigation Counsel, AB Volvo (publ) (added 23 January 2019)

Arnaud Agelou, Legal & Compliance Director, Renault Trucks SAS

Simon Villanueva, Legal Director, Volvo Group UK Limited

Sonica Dahri, Senior Legal Counsel, Volvo Group UK Limited

Jan Svensson, Vice President Legal, Volvo Truck Corporation

Pia Janson, Legal Counsel, Volvo Truck Corporation (added 23 April 2019)

Johan Carlsson, Project Manager EU Litigations (added 28 August 2019)

Benedikte Leroy, Senior Vice President, Legal and Compliance, Volvo Trucks Corporation
(added 6 May 2020)

Magnus Heidenvall, Vice President Legal, Volvo Trucks Corporation (added 6 May 2020)

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: