

Inv. Nos. A-570-147, A-533-910,
A-552-834, and C-533-911
731-TA-xxxx-xxxx
Total Pages:220

PUBLIC VERSION
Business Proprietary Information Removed
From Pages iii, 3, 5, 17, 19, 25-29, 31, 32, 34,
37, and Exhibits 1, 2, 17A, 32-35 of Volume I.

BEFORE THE
INTERNATIONAL TRADE ADMINISTRATION
UNITED STATES DEPARTMENT OF COMMERCE
AND THE
UNITED STATES INTERNATIONAL TRADE COMMISSION

In the Matter of)
)
PAPER FILE FOLDERS)
FROM CHINA, INDIA, AND VIETNAM))
)
_____) VOLUME I: GENERAL ISSUES
) AND INJURY

Petitioner:
Coalition of Domestic Folder Manufacturers

J. Michael Taylor
Stephen P. Vaughn
Daniel L. Schneiderman
Barbara Medrado
Bonnie B. Byers, Consultant
Edmond A. O'Neill, Consultant

King & Spalding LLP
1700 Pennsylvania Avenue, NW
Washington, DC 20006
(202) 737-0500

Counsel to Petitioner

October 12, 2022

TABLE OF CONTENTS

TABLE OF EXHIBITS.....	iii
I. INTRODUCTION	1
II. GENERAL INFORMATION.....	2
A. The Petitioner And The Degree Of Industry Support For The Petitions	2
1. The Petitioner.....	2
2. Other U.S. producers.....	3
3. Industry support for the petitions.....	4
B. Related Proceedings And Previous Requests For Relief	6
C. Description of The Subject Merchandise.....	7
1. Technical characteristics and uses	7
2. U.S. tariff classification numbers.....	9
3. Requested scope of the investigations	10
D. Class Or Kind Of Merchandise And Domestic Like Product.....	11
E. Countries Of Exportation.....	12
F. Producers, Exporters, Importers Of The Subject Merchandise	12
G. Volume And Value Of Subject Merchandise	13
III. DOMESTIC LIKE PRODUCT AND INDUSTRY DEFINITIONS.....	13
A. The Domestic Like Product Includes All Paper File Folders Covered by the Scope.....	13
1. Legal standard.....	13
2. The Like Product Factors Normally Considered by the Commission Support Finding a Single Like Product in these Investigations	15
B. The Domestic Industry Includes All U.S. Producers of Paper File Folders	18
IV. THE DOMESTIC INDUSTRY IS MATERIALLY INJURED BY REASON OF SUBJECT IMPORTS FROM CHINA, INDIA, AND VIETNAM.....	19

- A. Subject Imports Should Be Cumulated..... 19
- B. The Subject Imports Are Not Negligible From Any Of The Subject Countries..... 22
- C. Subject Imports Have Caused Material Injury to the Domestic Industry 23
 - 1. The Volume of Subject Imports Is Significant 23
 - 2. The Price Effects of Subject Imports Are Significant 28
 - 3. The Adverse Impact of Subject Imports Is Significant..... 32
 - 4. Conclusion 34
- D. Subject Imports Threaten the Domestic Industry with Further Material Injury Going Forward 35
 - 1. The Likely Volume of Subject Imports Is Significant..... 35
 - 2. The Likely Price Effects of Subject Imports Are Significant. 36
 - 3. The Likely Impact of Subject Imports Are Significant. 37
 - 4. Conclusion 38
- V. CONCLUSION..... 38

TABLE OF EXHIBITS

EXHIBIT I-1:	Standing Estimate (APO)
EXHIBIT I-2:	Declaration of [] (APO)
EXHIBIT I-3:	Example of poly file folder (Public)
EXHIBIT I-4:	Example of manila folder (Public)
EXHIBIT I-5:	Example of hanging folder (Public)
EXHIBIT I-6:	Example of fastener folder (Public)
EXHIBIT I-7:	Example of classification folder (Public)
EXHIBIT I-8:	Example of expanding folder (Public)
EXHIBIT I-9:	Example of pocket (Public)
EXHIBIT I-10:	Example of jacket (Public)
EXHIBIT I-11:	Example of wallet (Public)
EXHIBIT I-12:	Definition Letter Size (Public)
EXHIBIT I-13:	Harmonized Tariff System, Excerpt (Public)
EXHIBIT I-14:	Import Data (Public)
EXHIBIT I-15:	List of U.S. Producers (Public)
EXHIBIT I-16:	List of Foreign Producers (Public)
EXHIBIT I-17:	List of U.S. Importers (Public)
EXHIBIT I-17A:	List of Purchasers (APO)
EXHIBIT I-18:	Staples, “Smead File Folders” (Public)
EXHIBIT I-19:	Staples, “Oxford File Folders” (Public)
EXHIBIT I-20:	Office Depot, “Smead File Folders” (Public)
EXHIBIT I-21:	Office Depot, “Pendaflex File Folders” (Public)
EXHIBIT I-22:	“Smead Manila File Folder, 1/3 Cut Tab, Letter, 100 per Box” (Public)

- EXHIBIT I-23:** “Smead Hanging File Folders with Tab Letter” (Public)
- EXHIBIT I-24:** Office Depot, “File Folders” (Public)
- EXHIBIT I-25:** Staples, “Folders & Filing” (Public)
- EXHIBIT I-26:** TOPS Products, “Filing” (Public)
- EXHIBIT I-27:** Dan Berthiaume, “Staples in big brand revamp; rolling our more private labels,” Chain Store Age (Apr. 2, 2019) (Public)
- EXHIBIT I-28:** “Staples File Folder, 1/3 Cut Tab, Letter Size, Manila, 100/Box,” (Public)
- EXHIBIT I-29:** Import Data by Region (Public)
- EXHIBIT I-30:** Monthly Import Data (January 2019 to June 2022) (Public)
- EXHIBIT I-31:** Negligibility Analysis (Public)
- EXHIBIT I-32:** Apparent Consumption (APO)
- EXHIBIT I-33:** Financial Performance (APO)
- EXHIBIT I-34:** Evidence of Lost Sales and Lost Revenue (APO)
- EXHIBIT I-35:** Letter of Support by STS Filing Products, Inc (APO)

**PETITIONS FOR THE IMPOSITION OF ANTIDUMPING DUTIES
ON IMPORTS OF PAPER FILE FOLDERS FROM CHINA, INDIA, AND
VIETNAM, AND COUNTERVAILING DUTIES ON IMPORTS OF PAPER FILE
FOLDERS FROM INDIA**

VOLUME I: GENERAL ISSUES AND INJURY

I. INTRODUCTION

These petitions are filed by the Coalition of Domestic Folder Manufacturers (hereinafter the “Coalition,” or “Petitioner”) on behalf of the U.S. industry producing paper file folders. These investigations cover file folders consisting primarily of paper, paperboard, pressboard, or other cellulose material, whether coated or uncoated, that has been folded (or creased in preparation to be folded), glued, taped, bound, or otherwise assembled for holding documents.¹ For purposes of this volume, we will refer to these items as “paper file folders.”

The petitions seek the imposition of antidumping duties on U.S. imports of paper file folders from China, India, and Vietnam, pursuant to section 731 of the Tariff Act of 1930, as amended (the “Act”), *codified at* 19 U.S.C. § 1673. The petitions present evidence that imports of paper file folders from China, India, and Vietnam are being sold in the United States at less than normal value. The petitions also seek the imposition of countervailing duties on U.S. imports of paper file folders from India, pursuant to Section 701 of the Act, *codified at* 19 U.S.C. § 1671. The petitions present evidence that imports of paper file folders from India are benefiting from countervailable subsidies.

¹ For the full scope of these investigations, *see* p. 9-11 of this volume.

The petitions contain separate volumes for the allegations of dumping for China, India, and Vietnam,² and a separate volume for the allegations of subsidies from India.³ This volume contains general information as well as the required information concerning material injury and threat of material injury to the domestic industry. The allegations contained in these petitions consist of information that is reasonably available to the Petitioners to support the allegations made. The petitions are being filed in conformity with the requirements of section 351.202 of the regulations of the U.S. Department of Commerce (“the Department”),⁴ and section 207.11 of the regulations of the U.S. International Trade Commission (“ITC” or “Commission”).⁵

II. GENERAL INFORMATION

A. The Petitioner And The Degree Of Industry Support For The Petitions

1. The Petitioner⁶

The Petitioner – the Coalition of Domestic Folder Manufacturers – represents two U.S. producers of paper file folders. These producers are interested parties within the meaning of 19 U.S.C. § 1677(9)(C),⁷ and the Coalition is an interested party within the

² See Volumes II to IV of these petitions.

³ See Volume V of these petitions.

⁴ 19 C.F.R. § 351.202.

⁵ 19 C.F.R. § 207.11.

⁶ 19 C.F.R. §207.11(b)(2)(i); 19 C.F.R. §351.202(b)(1)

⁷ This provision defines “interested party” to include “a manufacturer, producer, or wholesaler in the United States of a domestic like product.”

meaning of 19 U.S.C. § 1677(9)(F).⁸ The two members of the Coalition are: (1) Smead Manufacturing Company (“Smead”) and (2) TOPS Products LLC (“TOPS”). Contact information for each member is provided below:

Smead Manufacturing Company, Inc.

600 Smead Blvd
Hastings, MN 55033
Contact: Casey Avent
Casey.avent@smead.com
(651) 438-2034
<https://www.smead.com>

TOPS Products LLC

184 Shuman Blvd. Ste. #130
Naperville, IL 60563
Contact: David Garber
David.a.garber@tops-products.com
(630) 821-3145
<https://www.tops-products.com>

2. Other U.S. producers⁹

As shown in more detail below, the petitioning parties account for the [] majority of U.S. production of paper file folders. Petitioner believes that the following companies also make paper file folders in the United States:

BSP Filing Solutions

123 Pilsudski St
Kosciusko, MS 39090
Contact: Andrew Frank
Andrew@bspfiling.com
(800) 356-3494
<https://bspfiling.com/>

TAB Products

605 Fourth Street

⁸ This provision defines “interested party” to include “an association, a majority of whose members is composed of interested parties” described in subparagraph (C) with respect to a domestic like product.

⁹ See 19 C.F.R. §207.11(b)(2)(ii); 19 C.F.R. §351.202(b)(2)

Mayville, WI 53050
Contact: Keith Weyer
kweyer@tab.com
(888) 466-8228
(800) 304-4947
<https://tab.com/>

STS Filing Products, Inc.
1100 Chandler St
Montgomery, AL 36104
Contact: Watkins Johnston III
wjohnston@sts-sys.com
(334) 265-8786
(800) 341-1340
<https://www.sts-sys.com/>

RD Thompson Paper Products Company, Inc.
1 Madison Street
Loudonville, OH 44842
Contact: Thomas Thompson
info@rdthompsonpaper.com
(419) 994-3614
<https://rdthompsonpaper.com/>

3. Industry support for the petitions¹⁰

The Department will determine that the petitions have sufficient industry support if the following criteria are met: (1) the domestic producers or workers who support the petition account for at least 25 percent of the total production of the domestic like product; and (2) the domestic producers or workers who support the petition account for more than 50 percent of the production of the domestic like product made by that portion of the industry expressing support for or opposition to the petition.¹¹ In these investigations, the Petitioner satisfies both requirements.

¹⁰ See 19 C.F.R. §351.202(b)(3).

¹¹ See 19 U.S.C. § 1673a(c)(4)(A).

Information regarding total production of the domestic industry is not available to Petitioner at this time. However, attached is a declaration from [] explaining the following:

First, [

].¹² Second, [

].¹³

When one takes these facts into account, it is clear that the Petitioner represents more than [] of total production of the domestic like product, as demonstrated in **Exhibit I-1**. Information reasonably available to the Petitioner indicates that in 2021, the two companies in the petitioning coalition collectively represented [] percent of U.S. production of paper file folders. Thus, there is far more than adequate domestic industry support for these petitions.¹⁴

¹² Information regarding the volume of shipments by the petitioning parties can be found in **Exhibit I-33**. [

]

¹³ Declaration of [] attached as **Exhibit I-2**.

¹⁴ It should be noted that **Exhibit I-35** is a letter of support by STS Filing Products, Inc. (“STS”), providing []. Compare with **Exhibit I-2**. If this support is added to the shipment values for the petitioning parties, then the level of support for the initiation of these investigations is even higher than the support described in the text.

B. Related Proceedings And Previous Requests For Relief¹⁵

Neither the Petitioner nor either company in the petitioning coalition has previously filed for antidumping or countervailing duty relief under sections 701 and 731 of the Act. Furthermore, the petitioning parties have not previously filed for trade relief from imports pursuant to section 337 of the Act, sections 201 or 301 of the Trade Act of 1974, or section 232 of the Trade Expansion Act of 1962.

On July 17, 2018, the Office of U.S. Trade Representative announced that U.S. imports from China under HTSUS number 4820.30.00 would be considered for duties under section 301 of the Trade Act of 1974.¹⁶ As described in more detail below, this HTSUS code includes the paper file folders at issue in these petitions. On September 21, 2018, the U.S. Government imposed duties of 10 percent on imports from China under HTSUS number 4820.30.00.¹⁷ On May 9, 2019, those duties were increased to 25 percent.¹⁸ These duties remain in place today.¹⁹

¹⁵ 19 C.F.R. §351.202(b)(4).

¹⁶ See Office of the United States Trade Representative, *Request for Comments Concerning Proposed Modification of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 33608 (Jul. 17, 2018).

¹⁷ See Office of the United States Trade Representative, *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 47974 (Sep. 21, 2018).

¹⁸ See Office of the United States Trade Representative, *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 20459 (May 9, 2019).

¹⁹ See Office of the United States Trade Representative, *Continuation of Actions: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 87 Fed. Reg. 55073 (Sep. 8, 2022).

C. Description Of The Subject Merchandise

The Department’s regulations ask petitioners to provide a “detailed description of the subject merchandise that defines the requested scope of the investigation, including the technical characteristics and uses of the merchandise and its current U.S. tariff classification number.”²⁰ This information is provided below.

1. Technical characteristics and uses

This requested scope of the investigation covers paper file folders, which can generally be described as file folders that consist primarily of paper, paperboard, pressboard, or other cellulose material.²¹ Paper file folders include different items, such as manila folders,²² hanging folders,²³ fastener folders,²⁴ classification folders,²⁵

²⁰ 19 C.F.R. § 351.202(b)(5).

²¹ There are also file folders made of plastic materials like polypropylene. These file folders are commonly referred to as “poly” products, which readily distinguishes them from the paper file folders at issue in these petitions. *See, e.g.*, Office Depot, “Office Depot Brand Poly File Folders, Letter Size, 1/3 Cut, Assorted Colors, Pack of 12,” available at <https://officedepot.com/a/products/1375867/Office-Depot-Brand-Poly-File-Folders/> (last visited Oct. 8, 2022), attached as **Exhibit I-3**. Poly file folders are not covered by these investigations.

²² For an example of manila folders, *see* <https://tops-products.com/pendaflexr-file-folders-legal-size-manila-1-3-cut-center-position-100-bx.html> (last visited Oct. 4, 2022), attached as **Exhibit I-4**.

²³ For an example of hanging folders, *see* <https://smead.com/products/fastab-hanging-file-folders-1-3-cut-built-in-tab> (last visited Oct. 4, 2022), attached as **Exhibit I-5**.

²⁴ For examples of fastener folders, *see* <https://tops-products.com/filing/folders-with-fasteners.html> (last visited Oct. 4, 2022), attached as **Exhibit I-6**.

²⁵ For an example of classification folders, *see* <https://smead.com/products/pressboard-classification-folders-2-dividers-2-inch-expansion-2-5-cut-tab> (last visited Oct. 4, 2022), attached as **Exhibit I-7**.

expanding folders,²⁶ pockets,²⁷ jackets,²⁸ and wallets.²⁹ All of these items share common technical characteristics:

- They are all made primarily of paper or other similar material.
- They are all designed to hold documents or other records commonly used in offices.
- Paper file folders sold in the U.S. market – whether domestically produced or imported – are generally designed to work with documents of the two primary paper sizes in the United States: (1) letter size and (2) legal size.³⁰
- They commonly feature some type of tab or label that allows one to identify the type of information contained inside the paper file folder.
- They are open or can be opened on at least one side to allow for the insertion and removal of documents and other materials.

²⁶ For an example of an expanding folder, *see* <https://officedepot.com/a/products/917272/Smead-Expanding-File-Pockets-3/12> (last visited Oct. 4, 2022), attached as **Exhibit I-8**.

²⁷ For an example of a pocket, *see* https://www.smead.com/products/end-tab-pocket-folders-with-reinforced-tab?_pos=10&_sid=a233707c0&_ss=r (last visited Oct. 9, 2022), attached as **Exhibit I-9**.

²⁸ For an example of a jacket, *see* https://www.smead.com/products/manila-file-jackets-flat-no-expansion-straight-cut-tab?_pos=9&_sid=4a67e22ae&_ss=r (last visited Oct. 9, 2022), attached as **Exhibit I-10**.

²⁹ For an example of a wallet, *see* https://www.smead.com/products/tuff-expanding-wallets-5-1-4-inch-expansion?pr_prod_strat=use_description&pr_rec_id=461091831&pr_rec_pid=7466213965995&pr_ref_pid=7466212098219&pr_seq=uniform (last visited Oct. 9, 2022), attached as **Exhibit I-11**.

³⁰ In the United States, the term “letter size” commonly refers to paper that is 8 ½ inches wide and 11 inches high. *See* “U.S. Paper Sizes,” available at <https://papersizes.org/us-paper-sizes.htm> (last visited Oct. 8, 2022), attached as **Exhibit I-12**. The term “legal size” commonly refers to paper that is 8 ½ inches wide and 14 inches high. *See id.*

- They generally feature plain designs and colors of the type normally seen in an office or other professional environment.³¹

The uses of paper file folders are consistent with these technical characteristics. These products are used primarily for storing documents and other materials in an office or home office environment. The type of paper file folder being used may vary based on the filing system used in a specific business – some businesses may rely primarily on manila file folders, while others may prefer hanging folders or fastener folders. Some businesses may use hanging folders for certain types of documents, and manila folders for other types. These are matters of personal preference, but in each case paper file folders are being used to store documents in an office or home office setting. That is the primary use for the paper file folders at issue here.

2. U.S. tariff classification numbers

Paper file folders are imported under subheading 4820.30.0040 of the Harmonized Tariff Schedule of the United States (“HTSUS”), although they may also appear in other HTSUS subheadings, such as 4820.30.0020.³² This HTSUS number includes binders (other than book covers), folders, and file covers of paper or paperboard. Thus, it should cover all the paper file folders subject to these petitions. Of course, as discussed in the next section, the coverage of these petitions is determined by the written description of the scope of the investigations, not the HTSUS numbers.

³¹ As described in the scope below, so-called “fashion folders,” which tend to feature elaborate designs and colors, are excluded from these investigations.

³² The relevant page from the Harmonized Tariff System covering paper file folder is contained in **Exhibit I-13**.

3. Requested scope of the investigations

The following language describes the imported merchandise that Petitioner intends to be included in the scope of these investigations:

The products within the scope of these investigations are file folders consisting primarily of paper, paperboard, pressboard, or other cellulose material, whether coated or uncoated, that has been folded (or creased in preparation to be folded), glued, taped, bound, or otherwise assembled to be suitable for holding documents. The scope includes all such folders, regardless of color, whether or not expanding, and with or without tabs, fasteners, closures, hooks, rods, hangers, pockets, gussets, or internal dividers.

Subject folders, which typically are used to hold letter and legal size documents, have the following dimensions in their folded and closed position: a length and width of at least 8 inches and no greater than 17 inches, regardless of depth.

The scope covers all varieties of folders, including but not limited to manila folders, hanging folders, fastener folders, classification folders, expanding folders, pockets, jackets, and wallets.

Excluded from the scope are:

- mailing envelopes with a flap bearing one or more adhesive strips that can be used permanently to seal the entire length of a side such that, when sealed, the folder is closed on all four sides;
- binders, with two or more rings to hold documents in place, made from paperboard or pressboard encased entirely in plastic;
- non-expanding folders with a depth exceeding 7 inches and that are closed or closeable on the top, bottom, and all four sides (e.g., boxes or cartons);
- fashion folders, which are defined as folders with all of the following characteristics: (1) plastic lamination covering the entire exterior of the folder, (2) printing, foil stamping, embossing (i.e., raised relief patterns that are recessed on the opposite side), and/or debossing (i.e., recessed relief patterns that are raised on the opposite side), covering the entire exterior surface area of the folder, (3) at least two visible and

- distinct printed or foil stamped colors other than the color of the base paper, and other than the printing of numbers, letters, words, or logos, each of which separately covers no less than 10 percent of the entire exterior surface area, and (4) patterns, pictures, designs, or artwork covering no less than thirty percent of the exterior surface area of the folder;
- portfolios, which are folders having (1) a width of at least 16 inches when open flat, (2) no tabs or dividers, and (3) one or more pockets that are suitable for holding letter size documents and that cover at least 15 percent of the surface area of the relevant interior side or sides; and
 - report covers, which are folders having (1) no tabs, dividers, or pockets, and (2) one or more fasteners or clips, each of which is permanently affixed to the center fold, to hold papers securely in place.

Imports of the subject merchandise are provided for under Harmonized Tariff Schedule of the United States (HTSUS) category 4820.30.0040 and may appear in other HTSUS categories, including 4820.30.0020. While HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of the investigation is dispositive.

D. Class Or Kind Of Merchandise And Domestic Like Product³³

The paper file folders covered by these investigations comprise a single class or kind of merchandise. Pursuant to 19 U.S.C. § 1677(10), paper file folders represent the product that is “like, or in the absence of like, most similar in characteristics and uses with the article subject to investigation.” Accordingly, as explained in **Section III** below, there is a single like product in these investigations, and that product includes all paper file folders described by the scope of these investigations.

³³ 19 C.F.R. §207.11(b)(2)(iv).

E. Countries Of Exportation³⁴

The countries in which the subject merchandise is manufactured or produced are China, India, and Vietnam. Data regarding these imports are included in **Exhibit I-14**. The petitioning companies are not aware of significant volumes of subject merchandise being imported from a country other than the country of manufacture or production.

F. Producers, Exporters,³⁵ Importers³⁶, and Purchasers³⁷ Of The Subject Merchandise

The names, addresses, and contact information of the companies that the Petitioner believes may have produced the subject merchandise are listed in **Exhibit I-15** for U.S. producers and **Exhibit I-16** for producers in the subject countries. The Petitioner has not been able to obtain information that would enable it to estimate the percentage of exports accounted for by each individual exporter.

The names, addresses, and contact information of the companies that the Petitioners believe may have imported the subject merchandise into the United States during the most recent twelve-month period preceding the filing of the petition are listed in **Exhibit I-17**. A list of purchasers is provided in **Exhibit I-17A**.

Contact information for all parties was collected via internet searches or Petitioner's market knowledge. Therefore, the exhibits list all information that is reasonably available to Petitioner.

³⁴ 19 C.F.R. §351.202(b)(6).

³⁵ 19 C.F.R. §351.202(b)(7)(i)(A-B).

³⁶ 19 C.F.R. §207.11(b)(2)(iii); 19 C.F.R. §351.202(b)(9).

³⁷ 19 C.F.R. §207.11(b)(2)(v).

G. Volume And Value Of Subject Merchandise

The volume and value of subject merchandise imported into the United States for full years 2019 to 2021, and for January-June 2021 and January-June 2022 can be found in **Exhibit I-14**.

III. DOMESTIC LIKE PRODUCT AND INDUSTRY DEFINITIONS

A. The Domestic Like Product Includes All Paper File Folders Covered By The Scope

The domestic like product is defined as the product that is “like, or in the absence of like, most similar in characteristics and uses with the article subject to investigation.”³⁸ The article subject to investigation includes all items covered by the scope of the investigation. In these cases, the scope generally covers “file folders consisting primarily of paper, paperboard, pressboard, or other cellulose material, whether coated or uncoated, that has been folded (or creased in preparation to be folded), glued, taped, bound, or otherwise assembled to be suitable for holding documents.”³⁹ As explained above, paper file folders include several different items, including manila folders, hanging folders, and fastener folders. Application of the Commission’s traditional like product factors demonstrates that all paper file folders covered by these investigations constitute a single like product. This fact is addressed in more detail below.

1. Legal Standard

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by

³⁸ 19 U.S.C. § 1677(10).

³⁹ *See* the scope of the investigations on p. 9-11 of this volume.

Commerce.⁴⁰ Therefore, the scope of the imported merchandise is the starting point for the Commission's analysis.⁴¹ The Commission then defines the domestic like product in light of the imported articles covered by the scope. The decision regarding the appropriate domestic like product is a factual determination, and the Commission has applied the statutory standard of "like" on a case-by-case basis.⁴² The Commission normally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price.⁴³ No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.⁴⁴ The Commission looks for clear dividing lines among possible like products and disregards minor violations.⁴⁵ In these petitions, the Commission's like product factors support treating all items covered by the scope as part of a single like product.

⁴⁰ See *Thermal Paper from Germany, Japan, Korea, and Spain*, Inv. Nos. 731-TA-1546-1549 (Final), USITC Pub. 5237 (Nov. 2021) at 4 (hereinafter "*Thermal Paper*").

⁴¹ *Id.*

⁴² *Id.* at 5.

⁴³ See *Nippon Steel Corp. v. United States*, 19 C.I.T. 450, 455 (1995), *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996).

⁴⁴ *Thermal Paper* at 5.

⁴⁵ *Id.*

2. The Like Product Factors Normally Considered by the Commission Support Finding a Single Like Product in these Investigations

a) Physical characteristics and uses

All paper file folders covered by these investigations share similar physical characteristics: (1) they are made primarily of paper or paper-like materials; (2) they are folded or otherwise assembled to be suitable for holding documents; (3) when folded and closed, they are between 8 and 17 inches in length; (4) they are generally designed to hold letter and/or legal size documents; and (5) they are generally plain in design, and appropriate for use in office settings. Furthermore, they have similar uses: they are used primarily in filing systems designed to help businesses and other organizations maintain records and other types of documents. Thus, this factor supports treating all paper file folders as part of the same domestic like product.

b) Interchangeability

Because paper file folders all generally serve the same type of purposes and uses – namely, helping organizations maintain records and other types of documents – they are broadly interchangeable. Some organizations may prefer manila folders, some may prefer hanging folders, some may prefer expanding file folders – but these are matters of individual preference, not a clear distinction between products. Indeed, it is not uncommon for the same office filing system to feature multiple types of paper file folders, such as manila folders and hanging folders. Thus, this factor plainly supports treating all paper file folders as part of the same domestic like product.

c) Channels of distribution

The channels of distribution are the same for all types of paper file folders. Both petitioning parties market paper file folders on their own company web pages, and their

products are generally sold through office supply stores, such as Staples⁴⁶ and Office Depot.⁴⁷ These products are also sold through other retailers, such as Amazon and Wal-Mart.⁴⁸ Thus, this factor also supports treating all paper file folders as a single like product.

d) Customer and producer perceptions

Both customers and producers generally recognize that the paper file folders covered by these cases are part of the same industry. For example, a search for “file folders” on the Office Depot web page turns up standard file folders, file pockets, classification folders, jackets, and wallets.⁴⁹ Staples has a web page devoted to “Folders

⁴⁶ See, e.g., Staples, “Smead File Folders,” at https://staples.com/Smead-File-Folders/cat_CL141669/006w9 (last visited Oct. 10, 2022), attached as **Exhibit I-18**; Staples, “Oxford File Folders,” at https://staples.com/Oxford-File-Folders/cat_CL141669/006lw (last visited Oct. 10, 2022), attached as **Exhibit I-19**. Oxford is a brand of TOPS. See <https://tops-products.com> (last visited Oct. 4, 2022).

⁴⁷ See, e.g., Office Depot, “Smead File Folders,” at <https://www.officedepot.com/a/browse/smead-file-folders/N=5+3545&cbxRefine=302883/> (last visited Oct. 10, 2022), attached as **Exhibit I-20**; Office Depot, “Pendaflex File Folders,” at <https://www.officedepot.com/a/browse/pendaflex/N=5+1030663/> (last visited Oct. 10, 2022), attached as **Exhibit I-21**. Pendaflex is a brand of TOPS. See <https://tops-products.com> (last visited Oct. 4, 2022).

⁴⁸ Paper file folders of the type covered by these petitions may readily be found by searching Amazon’s web page. For examples from Wal-Mart, see “Smead Manila File Folder, 1/3 Cut Tab, Letter, 100 per Box,” at <https://walmart.com/ip/Smead-Manila-File-Folder-1-3-Cut-Tab-Letter-100-per-Box-10330/15084668> (last visited Oct. 8, 2022), attached as **Exhibit I-22**; see also “Smead Hanging File Folders with Tab Letter,” at <https://walmart.com/ip/Smead-Hanging-File-Folders-Tab-Letter-8-1-2-x-11-Sheet-Size-1-3-Cut-Top-Location-Assorted-Position-11-pt-Folder-Thickness-Standard-Green-1-97-oz-Recy/14931652> (last visited Oct. 8, 2022), attached as **Exhibit I-23**.

⁴⁹ See “File Folders,” at <https://officedepot.com/a/browse/file-folders/N=5+3545&cbxRefine=1123628> (last visited Oct. 8, 2022), attached as **Exhibit I-24**.

& Filing” that covers “file folders,” “hanging file folders,” “pocket & presentation folders,” “classification folders,” “accordion folders,” and “filing accessories.”⁵⁰

Similarly, one of the petitioning parties has a web page devoted to “Filing” that includes “file folders,” “hanging folders,” “folders with fasteners,” and “expanding filing,” among other products.⁵¹ These facts show that both producers and customers plainly view the items at issue here as part of a broad category of products used for filing.

e) Common manufacturing facilities, production processes, and production employees

[

]. Similarly, [

].⁵² Thus, [

]. This clear overlap among the various types of paper file folders strongly indicates that they should be treated as part of the same like product.

⁵⁰ See “Folders & Filing,” at https://staples.com/Folders-Filing/cat_CG3539 (last visited Oct. 8, 2022), attached as **Exhibit I-25**.

⁵¹ See “Filing,” at <https://tops-products.com/filing.html> (last visited Oct. 8, 2022), attached as **Exhibit I-26**.

⁵² [

]

f) Price

As described above, paper file folders are generally made from the same type of material, are generally produced in the same facilities by the same workers, and are generally marketed together. They are also generally used for the same purposes and are often bought together for use in a company's filing system. Because of these facts, prices for all types of paper file folders tend to be influenced by the same factors, and generally move together. Once again, therefore, we see that this fact – like the other factors normally considered by the Commission – supports treating all paper file folders as part of the same domestic like product.

g) Conclusion

As shown above, a review of the Commission's usual factors plainly shows a significant overlap between all the paper file folders covered by these investigations. Given this fact, the Commission should find that all the paper file folders at issue constitutes a single like product.

B. The Domestic Industry Includes All U.S. Producers of Paper File Folders

The Act defines the term "industry" as "the producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."⁵³ To the best of the Petitioner's knowledge and belief, the companies listed in Section II.A above account for virtually all domestic production in the United States. The petitioning

⁵³ 19 U.S.C. § 1677(4)(A).

companies do not believe that any U.S. producers should be excluded from the domestic industry due to related party status.⁵⁴

IV. THE DOMESTIC INDUSTRY IS MATERIALLY INJURED BY REASON OF SUBJECT IMPORTS FROM CHINA, INDIA, AND VIETNAM⁵⁵

A. Subject Imports Should Be Cumulated

U.S. law provides that the Commission shall cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which petitions were filed on the same day, if such imports compete with each other and with the domestic like product in the U.S. market.⁵⁶

In these investigations, the Commission should cumulate imports from China, India, and Vietnam. The petitions against all three countries are being filed on the same day. Furthermore, as demonstrated below, subject imports from each country compete with each other and with the domestic like product.

In determining whether imports compete with each other and with the domestic like product, the Commission has generally considered the following four factors:

- the degree of fungibility between the imports from different countries and between imports and the domestic like product;
- the presence of sales or offers to sell in the same geographic markets of imports from different countries and the domestic like product;

⁵⁴ See 19 U.S.C. § 1677(4)(B)(i). [

]

⁵⁵ 19 C.F.R. §351.202(b)(10).

⁵⁶ 19 U.S.C. § 1677(7)(G).

- the existence of common or similar channels of distribution for imports from different countries and the domestic like product; and
- whether the imports are simultaneously present in the market.⁵⁷

In these investigations, each of these factors weighs in favor of cumulation.

Fungibility. Paper file folders from both subject producers and domestic producers is highly fungible. Indeed, retailers like Staples and Office Depot regularly sell paper file folders under so-called “private labels” – in other words, the product carries the name of the retailer or one of its brands, rather than the name of the company that produced the paper file folders.⁵⁸ In such circumstances, the retailer simply markets the paper file folders under its own name, regardless of where the product was made.⁵⁹ Given these facts, it is obvious that imports of paper file folders from each of the subject countries can be substituted for the domestic like product. In fact, head-to-head competition between such imports and the domestic like product is common. Thus, the fungibility factor weighs in favor of cumulation.

Same Geographic Markets. Domestic producers sell paper file folders throughout the U.S. market. As shown above, they regularly deal with national brands

⁵⁷ See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280 (Final), USITC Pub. 1845 (May 1986), *aff'd*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int'l Trade), *aff'd*, 859 F.2d 915 (Fed. Cir. 1988).

⁵⁸ See Dan Berthiaume, “Staples in big brand revamp; rolling out more private labels,” *Chain Store Age* (April 2, 2019), at <https://chainstoreage.com/technology/staples-in-big-brand-revamp-rolling-out-more-private-labels> (last visited Oct. 8, 2022), attached as **Exhibit I-27**.

⁵⁹ For an example, see “Staples File Folder, 1/3 Cut Tab, Letter Size, Manila, 100/Box,” at https://staples.com/Staples-Manila-File-Folders-Letter-3-Tab-Assorted-Position-100-Box/product_116657 (last visited Oct. 8, 2022), attached as **Exhibit I-28**.

such as Staples, Office Depot, and Wal-Mart. Similarly, **Exhibit I-29** shows that between 2019 and the first half of 2022, imports from each of the subject countries entered the U.S. market in regions across the country. This evidence shows that imports from each subject country and the domestic like product compete in the same geographic markets. Thus, this factor supports an overlap of competition.

Channels of Distribution. As shown above, paper file folders are sold through major national retailers, such as Staples, Office Depot, and Wal-Mart. Imports from all subject countries compete with the domestic like product for this business. Thus, this factor also supports a finding of cumulation.

Simultaneous Presence. Domestic producers have been active in the U.S. market at all times from 2019 through the first half of 2022. **Exhibit I-30** contains data regarding subject imports for each month from January 2019 through June 2022. These data show that imports from all three subject countries were present throughout the last few years. Once again, therefore, we see that this factor supports a finding of cumulation.

Conclusion. All the factors normally considered by the Commission support a finding that there is a reasonable overlap of competition between imports from each of the subject countries and the domestic like product. Thus, as part of its analysis of material injury, the Commission should cumulate all subject imports.

B. The Subject Imports Are Not Negligible From Any Of The Subject Countries

If the Commission finds that imports of the subject merchandise from a particular country are “negligible,” then the investigation into those imports shall be terminated.⁶⁰ Under the Act, dumped and subsidized imports are “negligible” if such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period.⁶¹ The Act further provides that also, pursuant to 19 U.S.C. § 1677(24)(A)(iv), in the context of a threat of injury determination, the Commission shall not treat imports as negligible if it determines that such imports will imminently exceed the relevant negligibility threshold.⁶² In analyzing negligibility, the Commission may make reasonable estimates on the basis of available statistics.⁶³

Information on subject imports for the most recent 12-month period in which data are available are contained in **Exhibit I-31**. These data establish that imports are not negligible from any of the subject countries.

⁶⁰ See 19 U.S.C. §§ 1671b(a)(1), 1673b(a)(1).

⁶¹ See 19 U.S.C. § 1677(24)(A)(i). The Act provides that in the case of countervailing duty investigations, the threshold for negligibility shall be 4 percent for imports from a developing country. 19 U.S.C. § 1677(24)(B). In this case, the only countervailing duty petition filed involves imports from India, and the United States does not regard India as a developing country for purposes of this provision. See Office of the U.S. Trade Representatives, *Designations of Developing and Least-Developed Countries Under the Countervailing Duty Law*, 85 Fed. Reg. 7613 (Feb. 10, 2020).

⁶² 19 U.S.C. § 1677(24)(A)(iv).

⁶³ 19 U.S.C. § 1677(24)(C).

C. Subject Imports Have Caused Material Injury To The Domestic Industry

Under the Act, to obtain relief from unfair trade domestic producers must show that an industry in the United States is materially injured, or is threatened with material injury, by reason of imports of subject merchandise.⁶⁴ The Act defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”⁶⁵ In making determinations of material injury by reason of imports of subject merchandise, the Commission shall consider: (1) the volume of imports of the subject merchandise, (2) the effect of imports of that merchandise on prices in the United States for domestic like products, and (3) the impact of imports of such merchandise on domestic producers of domestic like product in the context of production operations within the United States.⁶⁶ As shown below, each of these statutory factors shows that subject imports have caused material injury to the domestic industry.

1. The Volume of Subject Imports is Significant

a) Import volumes from subject countries

The Department’s regulations state that a Petition should contain the “volume and value of the subject merchandise imported during the most recent two-year period and any other recent period that the petitioner believes to be more representative.”⁶⁷ In this

⁶⁴ See 19 U.S.C. §§ 1671d(b)(1), 1673d(b)(1).

⁶⁵ 19 U.S.C. § 1677(7)(A).

⁶⁶ 19 U.S.C. § 1677(B)(i). The Commission may consider “such other economic factors as are relevant to the determination regarding whether there is material injury by reason of imports.” 19 U.S.C. § 1677(B)(ii).

⁶⁷ 19 C.F.R. § 351.202(b)(8).

case, the best information reasonably available to the Petitioner regarding subject import volumes comes from U.S. Census data showing imports under HTSUS category 4820.30.0040. As explained above, the Petitioner believes that this category covers all imports of the paper file folders at issue here. Certain imports not covered by the scope of these investigations may also be reported under that code. Subject imports may also be reported under other categories, such as 4820.30.0020. Nevertheless, at this time the best information available is the Census data under HTSUS category 4820.30.0040. Furthermore, the petitioning parties believe that these data accurately represent import trends for each of the subject countries. Thus, throughout this discussion, we will use Census data under HTSUS category 4820.30.0040 to estimate the volume and value of subject merchandise. **Exhibit I-14** contains such data for the period most likely to be considered by the Commission in its preliminary investigation: data for full years 2019 to 2021, and data for January-June 2021 and January-June 2022.

b) Available information indicates that subject import volumes were significant in both absolute and relative terms

The Act provides that “{i}n evaluating the volume of imports of merchandise, the Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production of consumption in the United States, is significant.”⁶⁸ When this type of analysis is made here, based on the best information available to the Petitioner, it seems clear that subject imports are significant, both in absolute terms and in relative terms.

⁶⁸ 19 U.S.C. § 1677(7)(C)(i).

Exhibit I-32 estimates apparent U.S. consumption of paper file folders, measured by value in U.S. dollars, for 2019 to 2021, and for January-June 2021 and January-June 2022.⁶⁹ According to this estimate, the value of U.S. apparent consumption of paper file folders fell from [] in 2019 to [] in 2020, before rising []⁷⁰ These facts plainly show the effects of the coronavirus pandemic in 2020, which undoubtedly led to weaker demand for office products, such as paper file folders. So far this year, apparent U.S. consumption has continued to rebound, with the estimated figure rising from [] in January-June 2021 to [] in January-June 2022.⁷¹

Subject imports played a significant role in the U.S. market throughout this period. In absolute terms, the value of subject imports fell from \$57.9 million in 2019 to \$49.7 million in 2021.⁷² However, that figure has risen dramatically this year, soaring

⁶⁹ To estimate apparent U.S. consumption of paper file folders, we have taken import data as reported by Census under HTSUS Category 4820.30.0040. []

]

⁷⁰ See **Exhibit I-32**. Again, it must be emphasized that these are estimates based on the best information that is reasonably available to the Petitioner. The Census data for HTSUS Category 4820.30.0040 may include data for merchandise that is outside the scope of these investigations. []

] Nevertheless, the Petitioner believes that these estimates accurately reflect the trends in the marketplace during the relevant time periods.

⁷¹ See **Exhibit I-32**.

⁷² It should be noted that in May 2019, the Section 301 duties on imports from China were raised from 10 percent to 25 percent. See the discussion at p. 5-6 of this

from \$26.4 million in January-June 2021 to \$45.98 million in January-June 2022, an increase of 74.3 percent.⁷³ To put these data in perspective, consider that [

] ⁷⁴ In other words, [

]. Thus, it seems clear that

both the absolute volume of subject imports – and the increase in that volume – was significant.

But subject imports are even more significant when measured relative to the U.S. market. While it is true that the estimated value of subject imports fell from 2019 to 2021, it did not fall relative to estimated apparent U.S. consumption. In fact, subject imports' estimated share of the U.S. market rose from [] percent in 2019 to [] percent in 2021.⁷⁵ This increase came at the expense of imports from non-subject countries (primarily Mexico), which saw their estimated market share fall from [] percent in 2019 to [] percent in 2021.⁷⁶ During this period, [

volume. This fact may explain why the estimated value of subject imports from China fell from \$48.6 million in 2019 to \$17.5 million in 2021. *See Exhibit I-14.* Thus, Section 301 duties on China may have contributed to the absolute decline in the estimated value of subject imports from 2019 to 2021. Nevertheless, subject producers in China remained very active in this market even after the Section 301 duties were raised to 25 percent. In fact, the estimated value of subject imports from China rose from \$9.953 million in January-June 2021 to \$14.8 million in January-June 2022. *Id.*

⁷³ *See Exhibit I-14.* $(45,980,938 - 26,385,147 = 19,595,791; 19,595,791 / 26,386,147 = 0.743 = 74.3 \text{ percent})$.

⁷⁴ *See Exhibit I-32.*

⁷⁵ *See Exhibit I-32.*

⁷⁶ *See Exhibit I-32.*

] Furthermore, the domestic producers would undoubtedly have lost more sales to subject imports during this period if they had not accepted unfavorable pricing []

The explosive growth in subject imports during the first half of 2022 came at the direct expense of U.S. producers. The estimated share of the U.S. market held by subject imports rose from [] percent in January-June 2021 to [] percent in January-June 2022, an increase of [] percentage points from one year to the next.⁷⁷ Meanwhile, the estimated market share held by domestic producers fell from [] percent in January-June 2021 to [] percent in January-June 2022, a decrease of [] percentage points.⁷⁸ As these facts show, [] market share lost by domestic producers went directly to subject imports – not to non-subject imports. Indeed, the record shows that the estimated share of the U.S. market held by imports from Mexico – the only significant import source other than China, India, and Vietnam – fell from [] percent in 2019 to [] percent in 2021 and was [] percent in January-June 2022.⁷⁹ Thus, it is clear that imports from the subject countries – not imports from Mexico or any other non-subject country – are taking sales from domestic producers.

⁷⁷ See Exhibit I-32.

⁷⁸ See Exhibit I-32.

⁷⁹ See Exhibit I-32.

In short, the best available data indicate that subject imports [] increased their share of the U.S. market from 2019 to 2021, despite weakened demand, and then [] increased their market share from January-June 2021 to January-June 2022. Thus, both the relative volume of subject imports – and the increase in that relative volume – are significant.

2. The Price Effects of Subject Imports are Significant

In evaluating the effects of subject imports on prices, the Commission shall consider whether: (1) there has been significant underselling by the imported merchandise as compared with the price of the domestic like product, and (2) the effect of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.⁸⁰ As shown below, both of these factors support a finding that the adverse price effect of subject imports was significant.

a) Evidence regarding underselling

As shown throughout this submission, paper file folders consist largely of standard, well-known products sold primarily to highly sophisticated retailers. Indeed, many sales of paper file folders are made by so-called “private label” brands – brands that represent the retailer, not the actual producer of the paper file folders at issue. Under these circumstances, domestic producers are obviously limited in their ability to rely on non-price factors to compete with subject imports, and much of the competition within this market takes place on the basis of price.

⁸⁰ 19 U.S.C. § 1677(7)(B)(ii).

Under these circumstances, it is obvious that subject imports could not have taken [] market share from the domestic industry between January-June 2021 and January-June 2022 unless those imports were being offered at very low prices. And, indeed, Census data indicate that this is precisely what happened. From 2019 to 2021, pricing for subject imports remained relatively stable. The average unit value (“AUV”) for subject imports was \$1.52/pound in 2019, \$1.51/pound in 2020, and \$1.56/pound in 2021.⁸¹ As shown above, during this period subject imports were able to [] increase their estimated share of the U.S. market, which indicates that these prices were highly competitive. But the AUV of subject imports fell from \$1.56/pound in January-June 2021 to \$1.48/pound in January-June 2022,⁸² even though estimated apparent U.S. consumption indicated an increase in demand as the U.S. economy recovered from the pandemic.⁸³ Over this same period, as we have shown, subject import volumes (measured in pounds) grew by 84.2 percent.⁸⁴ Together, these facts

⁸¹ See **Exhibit I-14**.

⁸² See **Exhibit I-14**.

⁸³ **Exhibit I-14** indicates that the AUV for imports from Mexico is generally lower than the AUV for subject imports. But we believe that []

]

⁸⁴ See **Exhibit I-14**. As shown above, when measured by *value*, subject imports grew by 74.3 percent from January-June 2021 to January-June 2022. The lower increase when measured by value reflects the fact that the AUV of subject imports fell over that period.

strongly indicate that subject imports are entering the U.S. market at very low prices and using those low prices to take sales from the domestic industry.

As part of its preliminary investigation, the Commission can obtain pricing data for both the domestic like product and subject imports. The Petitioner requests that the Commission collect data for the following representative products:

- **Product 1:** Box of 100 file folders, each folder made from a single piece of paperboard folded along a primary score line that creates a front flap and a back flap. The paperboard is made from uncoated freesheet paper, manila in color, with a thickness of 11 points, a 105-pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste. Each file folder is letter size and will have an extended paper tab on the back flap visible above the height of the front flap for labeling. Each file folder will have one 1/3 cut size tab in one of three positions (left, center, right).
- **Product 2:** Box of 25 hanging file folders, each folder made from a single piece of paperboard folded along a primary score line that creates a front flap and a back flap. The paperboard is made from uncoated freesheet paper, standard green in color, with a thickness of 11 points and a 126 to 144 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis). Each hanging file folder is letter size and will have a metal rod with small indentations or hooks on the end, and the ends of the rods will be coated. The box will contain 25 plastic tabs, each of which is 1/5 cut size, along with 25 white paper inserts.
- **Product 3:** Box of 50 fastener folders, each folder made from a single piece of paperboard folded along a primary score line that creates a front flap and a back flap. The paperboard is made from uncoated freesheet paper, manila in color, with a thickness of 11 points, a 124 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 10 percent recycled post-consumer waste. Each fastener folder will be letter size and will come with two embedded 2 inch fasteners stamped into the material. Each fastener folder will have an extended reinforced paper tab on the back flap visible above the height of the front flap for labeling. Each fastener folder will have one 1/3 reinforced tab in one of three positions (left, center, right).

b) Other evidence of adverse price effects

In addition to the evidence above regarding underselling, further evidence suggests that the effects of subject imports “otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.”⁸⁵ For example, in 2019 the combined operating margin for the petitioning parties on their sales of paper file folders was [] Thus, at all times throughout the period of investigation, domestic producers were under significant pressure to obtain more favorable pricing. But they were unable to do so – in fact the AUV of their sales [] from 2019 to 2021,⁸⁶ while their combined operating margin []⁸⁷ As we have shown, when measured on a value basis, apparent U.S. consumption grew from January-June 2021 to January-June 2022. Under these circumstances, domestic producers should have been able to obtain more favorable pricing – []⁸⁸ As we have shown, however, the prices for subject imports fell over this period, and the best available data indicate that domestic producers lost a significant share of the U.S. market.⁸⁹ In other words, it seems

⁸⁵ 19 U.S.C. § 1677(7)(C)(ii)(II).

⁸⁶ See **Exhibit I-33**.

⁸⁷ See **Exhibit I-33**.

⁸⁸ See **Exhibit I-33**.

⁸⁹ Significantly, when measured in units – which is how the domestic producers normally keep their records in the ordinary course of business – [

] See **Exhibit I-33**.

clear that any effort by domestic producers to obtain more favorable pricing will quickly result in lost sales. This fact strongly indicates that the constant presence of low-priced imports from subject countries is depressing U.S. pricing, and preventing price increases that might otherwise occur. Thus, it seems clear that the adverse price effects of subject imports are significant.

c) Evidence of lost sales and lost revenues

Exhibit I-34 contains available information relating to certain examples of lost sales and lost revenues for the Petitioner.⁹⁰ Of course, the [] loss of market share by petitioning parties represents the strongest possible evidence that domestic producers lost sales and revenue to subject imports.

3. The Adverse Impact of Subject Imports is Significant

The Act provides that in examining the impact of subject imports, the Commission shall evaluate all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to:

- actual and potential decline in output, sales, market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity,
- factors affecting domestic prices,
- actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, and
- actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product.⁹¹

⁹⁰ In accordance with 19 C.F.R. § 207.11(b)(2)(v), Petitioner will submit lost sales and lost revenues allegations electronically in the manner specified in the Commission's Handbook on Filing Procedures.

⁹¹ 19 U.S.C. § 1677(7)(C)(iii).

The Commission shall evaluate all relevant economic factors within the context of the business cycle and conditions of competition that are distinctive to the affected industry.⁹²

The mere fact that apparent U.S. consumption of paper file folders seems to have fallen from 2019 to 2021 is not sufficient to break the causal link between subject imports and the harm suffered by domestic producers. The Commission has recognized that “{i}n many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry.”⁹³ The Commission has explained that it “need not isolate the injury caused by other factors from injury caused by unfairly traded imports.”⁹⁴ Furthermore, the law does not “require that unfairly traded imports be the ‘principal’ cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.”⁹⁵

When this legal standard is applied to the evidence reasonably available to the Petitioner, it seems clear that subject imports have, indeed, had an adverse impact on the domestic industry. As shown above, since 2019 unfairly traded imports have consistently held a significant share of the U.S. market, and have consistently been priced at levels that made it impossible for domestic producers like TOPS and Smead to obtain a fair rate

⁹² 19 U.S.C. § 1677(7)(C)(iii).

⁹³ *See Sodium Nitrate from Russia*, Inv. No. 701-TA-680 (Final), USITC Pub. 5342 (Aug. 2022) at 18.

⁹⁴ *Id.* at 19.

⁹⁵ *Id.* at 19-20.

of return on their sales of paper file folders. Furthermore, a huge surge of imports from January-June 2021 to January-June 2022 took significant market share from the domestic industry and exerted further downward pressure on U.S. pricing. The factors to be considered by the Commission overwhelmingly support a finding that the impact of subject imports was significant:

- ***Actual and potential decline in industry performance.*** Data from the Petitioner companies show that [

] ⁹⁶

- ***Factors affecting domestic prices.*** As previously shown, [

] These facts indicate that domestic producers are unable to obtain a true market price for their paper file folders.

- ***Actual and potential negative effects.*** Obviously, the facts above [

] Indeed, it seems clear that if current trends continue, the very future of the domestic industry is at risk.

- ***Development and production efforts.*** [

] Indeed, the facts here show that domestic producers need trade relief to preserve their current operations.

In light of these facts, it is clear that information reasonably available to the Petitioner shows that subject imports had a severe, adverse impact on the domestic industry.

4. Conclusion

As shown above, each statutory factor that the Commission considers with respect to material injury – the volume of subject imports, the adverse price effect of subject

⁹⁶ See Exhibit I-33.

imports, and the adverse impact of subject imports – is significant. Accordingly, it is clear that these petitions allege evidence showing that subject imports have caused material injury to the domestic industry.

D. Subject Imports Threaten the Domestic Industry with Further Material Injury Going Forward

The Act identifies eight specific factors for the Commission to consider when deciding whether an industry in the United States is threatened with material injury by reason of sales of the subject merchandise.⁹⁷ In addition to those eight factors, the Commission shall also consider “any other demonstrable adverse trends that indicate the probability that there is likely to be material injury” by reason of subject imports.⁹⁸ As discussed below, these factors indicate that in the absence of trade relief, subject imports threaten domestic producers with additional material injury going forward.

1. The Likely Volume of Subject Imports is Significant

Several factors the Commission is supposed to consider relate to the likely volume of subject imports in the absence of trade relief. Here, those factors support a finding that unless trade relief is imposed, subject imports are likely to continue surging. For example, the Commission is supposed to consider whether subject producers benefit from export subsidies.⁹⁹ Volume V of these petitions shows that subject producers in India are, in fact, benefiting from export subsidies. Obviously, subsidies that are

⁹⁷ See 19 U.S.C. §§ 1677(7)(F)(i)(I) to (VIII). Please note that one of these factors, which relates to raw agricultural products, is not relevant here. See 19 U.S.C. § 1677(7)(F)(i)(VII).

⁹⁸ 19 U.S.C. § 1677(7)(F)(i)(IX).

⁹⁹ 19 U.S.C. § 1677(7)(F)(i)(I).

specifically tied to exports of the subject product will encourage producers in India to increase exports to the United States. The Commission is also directed to consider “a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports.”¹⁰⁰ As we have already shown, subject imports were surging dramatically during the first half of 2022, and are taking market share from domestic producers as a result. The fact that subject imports have already risen so quickly is a strong indication that in the absence of trade relief, subject imports will continue to cause more harm to domestic producers.¹⁰¹ Thus, it seems clear that the likely volume of subject imports is significant.

2. The Likely Price Effects of Subject Imports are Significant.

The Commission is supposed to consider “whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports.”¹⁰² Here the answer to that question is certainly in the affirmative. The estimated volume of subject imports rose by more than 84 percent from January-June 2021 to January-June 2022. Over the same period, the AUV of subject imports fell.

¹⁰⁰ 19 U.S.C. § 1677(7)(F)(i)(III).

¹⁰¹ The Commission is also supposed to consider unused capacity in the subject countries, 19 U.S.C. § 1677(7)(F)(i)(II), inventories of the subject merchandise, 19 U.S.C. § 1677(7)(F)(i)(V), and the potential for product shifting by subject producers, 19 U.S.C. § 1677(7)(F)(i)(VI). Very little information is publicly available to the Petitioner on these points. However, given the dramatic increase of subject imports from January-June 2021 to January-June 2022, there can be no question that subject producers have shown the ability to quickly take sales from the domestic industry. Furthermore, we expect to develop these points further as the Commission conducts its investigation and issues questionnaires to subject producers.

¹⁰² 19 U.S.C. § 1677(7)(F)(i)(IV).

These facts plainly indicate that subject imports are being offered at prices that are putting downward pressure on domestic pricing, and are likely to increase demand for more unfairly traded imports. Thus, the Commission should conclude that in the absence of trade relief, the likely price effects of subject imports are significant.

3. The Likely Impact of Subject Imports are Significant.

The Commission is supposed to consider “the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product.”¹⁰³

As we have already shown, [

]

Indeed, [

] Under these circumstances, it is obvious that the

development and production efforts of the domestic industry are at risk by reason of unfair trade.

Furthermore, domestic producers face other demonstrable adverse trends,¹⁰⁴ such as a weakening of the U.S. market due to the effects of the pandemic. These events have left domestic producers vulnerable to material injury, and they are in no position to face a continued onslaught of unfairly traded imports from China, India, and Vietnam. Thus, the Commission should conclude that in the absence of trade relief, the likely impact of subject imports is significant.

¹⁰³ 19 U.S.C. § 1677(7)(F)(i)(VIII).

¹⁰⁴ See 19 U.S.C. § 1677(7)(F)(i)(IX).

4. Conclusion

The likely volume, the likely price effects, and the likely impact of subject imports are all significant – unless domestic producers obtain trade relief. Thus, information available to the Petitioner plainly shows that subject imports threaten domestic producers with additional material injury.

V. CONCLUSION

Imports of paper file folders from China, India, and Vietnam are being sold in the United States at less than fair value. Additionally, the Government of India is subsidizing exports of paper file folders. The domestic industry producing paper file folders is materially injured and threatened with material injury by reason of such unfairly traded imports. The Petitioner, therefore, requests that the Department initiate antidumping investigations on imports of paper file folders from China, India, and Vietnam, and that it initiates an investigation on countervailable subsidies in India. The Petitioner further requests that the Commission make affirmative determinations of material injury or threat of material injury by reason of such dumped imports.

Respectfully submitted,

/s/ J. Michael Taylor

J. Michael Taylor
Stephen P. Vaughn
Daniel L. Schneiderman
Barbara Medrado
Bonnie B. Byers
Edmond A. O'Neill

King & Spalding LLP
1700 Pennsylvania Avenue NW
Washington, DC 20006
(202) 737-0500

Counsel to Petitioner

EXHIBIT I-1

Exhibit I-1: Standing Calculation

	Scenario I	Scenario II
Petitioning Parties	[]
Others	[]
Participation	[]

1 - See Financial Performance, attached as Exhibit I-33.

2 - See Declaration of [] attached as Exhibit I-2. [

].

EXHIBIT I-2

CONFIDENTIAL DECLARATION OF []

1. My name is []. I am the []
[]. I have worked for []years, and I have worked in the U.S.
paper file folder industry for [] years.

2. []
[]

3. []
[]

4. []
[]

5. []
[]

6. []
[]

7. I declare under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

(Date)

[_____]
[]

EXHIBIT I-3

25% off your qualifying reg. priced purchase Shop now | 30% back in Bonus Rewards on ALL Ink & Toner Shop now

Home / Office Supplies / Filing & Folders / File Folders / File Folders / Product Details

< File Folders

Office Depot® Brand Poly File Folders, Letter Size, 1/3 Cut, Assorted Colors, Pack Of 12

Item #1375867 | 🔗

★★★★★ 4.7 (98)



1 / 4

Description

Specs

Reviews

Organization is the key to getting more done at work and home. Keep client information, tax documents and other critical paperwork in these Office Depot file folders, and their rugged poly construction will safeguard the contents against damage and moisture for safe storage.

- Polypropylene construction for wear, tear and moisture resistance.
- 1/3-cut tabs in left, right and center positions.
- Add color files to existing manila files for quick retrieval.
- Letter-size (8 1/2" x 11") folders with a 1/3 tab cut to view the contents at a glance.
- Available in assorted colors, these polypropylene file folders in a pack of 12 provide a simple way to color code stored documents.

👉 Save 25% OFF Today Click to Add Coupon

\$13.79/ pack

- 1 +

Add To Cart

- 🚚 Next Business Day Delivery
Next Business Day Delivery 45 in Stock
- 📍 Free In-Store or Curbside Pickup ⓘ
Ready in 20 minutes In Stock
In Stock At 46301 Potomac Run Plaza, Sterling, VA, 20164
[Check Another Store](#)

Others also purchased



-  Office Depot® Brand Sticky Notes Value Pack, 3" x 3",...
★★★★★ (487)
\$20.39 each
[View Details](#) >
-  BIC® Round Stic® Ballpoint Pens, Medium Point, 1.0 mm,...
★★★★★ (1126)
\$7.49 each
[View Details](#) >

EXHIBIT I-4

Pendaflex® File Folders, Legal Size, Manila, 1/3 Cut, Center Position, 100/BX

[Be the first to review this product](#)

\$60.90

Must be purchased in multiples of 5 boxes of 100

Pendaflex
PFX 753 1/3-2

Pendaflex® File Folders are perfect for everyday filing needs. Our standard Manila folders stand up to the daily grind. Legal size, 1/3-cut tabs in center position. 100 Per box.

5

Add to Cart

ADD TO LIST
Available in increments of 5

EMAIL





Details



- Pendaflex® File Folders are perfect for everyday filing needs
- Our standard Manila folders stand up to the daily grind
- Legal size
- 1/3-cut tabs in center position
- 100 per box

More Information



Reviews



[Terms of Use](#) [Privacy Policy](#)

©2022 TOPS Products

EXHIBIT I-5



FasTab® Hanging File Folders, 1/3-Cut Built-In Tab

\$22.21

Pay in 4 interest-free installments for orders over \$50.00 with [shop Pay](#) [Learn more](#)

These eco-friendly FasTab hanging folders are made from 100% recycled material and have built-in reinforced tabs attached to the folder for hassle-free organizing. No assembly required. They are easy to label by either handwriting directly on the tab or applying self-adhesive labels

- Built-in heavy-duty tabs for quick and easy labeling.
- Hand write on the tab or apply a self-adhesive label
- No plastic tabs required
- Stronger than standard hanging pockets
- Full height gussets and die cut handles for secure and easy transport

Color: Assorted Primaries



Size

Letter Legal

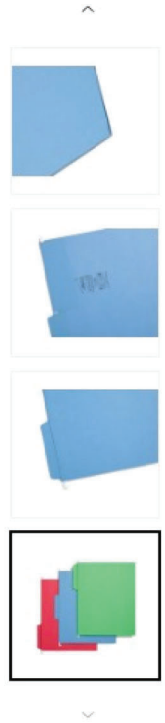
Set of

18 24 9

Quantity

- 1 +

ADD TO CART



Details

Shipping & Returns

EXHIBIT I-6

Folders with Fasteners

SHOPPING OPTIONS

- Category
- Color
- Sheet Capacity
- Price

ITEMS 1-12 OF 137

SORT BY MOST RELEVANT



Classification Folders - Standard, 1 Divider, 2" Embedded, Lgl, Light Green, 10/Bx
PFX 17175EE
\$96.85



Pendaflex® Manila Fastener Folders, Letter Size, 2 Fasteners, Straight Cut, 50/BX
PFX FM212
\$79.49



Pendaflex® Manila Fastener Folders, Legal Size, 2 Fasteners, Straight Cut, 50/BX
PFX FM312EE
\$87.60



Manila Fastener Folders, Letter size, Manila
PFX M13U13
\$92.13



Pendaflex® Recycled Pressboard Fastener Folders, Legal Size, Light Blue, 1" Expansion, 1/3 Cut, 25/BX
PFX FP313R
\$110.69



Pendaflex® Recycled Pressboard Fastener Folders, Letter Size, Light Blue, 1" Expansion, 1/3 Cut, 25/BX
PFX FP213R
\$89.42



Pendaflex® Classification Folders, Economy, 1 Divider, Bonded Fasteners, 2/5 Cut Tab, Manila, Legal, 10/BX, 10 BX/CT
PFX 98621P
\$77.58



Pendaflex® Recycled Pressboard Fastener Folders, Legal Size, Light Blue, 2" Expansion, 1/3 Cut, 25/BX
PFX 61552R
\$122.78



Pendaflex® Recycled Pressboard Fastener Folders, Letter Size, Light Blue, 2" Expansion, 1/3 Cut, 25/BX
PFX 61542R
\$99.55



Pendaflex® Classification Folders, Standard, 2 Pocket Dividers, Embedded Fasteners, 2/5 Cut Tab, Dark Green, Legal, 10/BX, 5 BX/CT
PFX 29083P
\$136.94



Pendaflex® Classification Folders, Standard, 2 Pocket Dividers, Embedded Fasteners, 2/5 Cut Tab, Bright Red, Legal, 10/BX, 5 BX/CT
PFX 29082P
\$136.94



Pendaflex® Classification Folders, Standard, 1 Divider, Embedded Fasteners, 2/5 Cut Tab, Dark Green, Legal, 10/BX, 5 BX/CT
PFX 28733P
\$105.97

EXHIBIT I-7



PRODUCTS ▾

INSPIRATION

HISTORY

ABOUT



Pressboard Classification Folders, 2 Dividers, 2 inch Expansion, 2/5-Cut Tab

\$29.63

Pay in 4 interest-free installments for orders over \$50.00 with [shop Pay](#) [Learn more](#)

Made of 100% recycled content, these files are ideal for the environmentally conscious office. Heavy-duty classification folders make excellent project files. Perfect for personnel, real estate, accounting or banking files. Sturdy tear resistant gusset expands to hold up to 2" of material. Colors signal category or type of project at a glance. Fasteners on front and back panels and dividers create up to eight separate filing surfaces within one folder.

- Includes 10 legal size partition folders (14-3/4" W x 10" H), ideal for organizing documents, subdividing them for quick access and keeping them in sequential order for maximum efficiency
- Each top tab file folder has 1 sturdy divider and 4 separate filing surfaces available, all featuring K style fasteners to keep important papers secure and ensure nothing gets misplaced
- These heavy-duty project files contain 100% recycled content, 30% post-consumer material and are SFI Sourcing Certified, allowing you to be both organized and environmentally conscious
- The 2/5-cut tab in right of center position works well with drawer filing systems for easier and faster filing; Compatible with our Viewables Multipurpose Labels (64915), sold separately
- A 2" expansion capacity provides greater storage and ensures your projects stay organized and neatly sorted even if they become bulkier, helping you keep up with new organizational needs



Color: Red



Size

Letter

Set of

5

Quantity

- 1 +

ADD TO CART

Details ▾

Shipping & Returns ▾

EXHIBIT I-8

25% off your qualifying reg. priced purchase Shop now | 30% back in Bonus Rewards on ALL Ink & Toner Shop now

Free next-business-day shipping on qualifying \$45 order Free store & curbside pickup in 20 minutes

20+ Employee Businesses Recently Viewed

Home / Office Supplies / Filing & Folders / Expanding File Folders / Expanding File Folders / Product Details

< Expanding File Folders

Smead® Expanding File Pockets, 3 1/2" Expansion, 9 1/2" x 11 3/4", 30% Recycled, Redrope, Pack Of 25

Item #917272 |

★★★★★ 4.9 (47)



1 / 4

Description

Specs

Reviews

Eco Conscious Recycled content Diverse Supplier

Smead expanding file pockets are extra durable, even when fully packed. Our tear resistant rolover reinforced sides make them virtually tear proof.

- These expanding file organizers have pocket sides that are reinforced with tear resistant material to last longer and hold more.
- Smead expanding file pockets feature double-thick, manila-lined fronts and backs for extra strength.
- Greener choice — contains a minimum of 30% post-consumer recycled content.
- SFI Fiber-Sourcing Certified.
- Redrope 30% recycled expanding file pockets come in a pack of 25 and each is measured at 9 1/2" x 11 3/4" size with 3 1/2" expansion.
- Contains Recycled Content - See Specs for Details

\$78.49/ box

[Subscribe](#) ⓘ

Also available in

Select An Option ▾

Next Business Day Delivery
Next Business Day Delivery In Stock

Others also purchased

Office Depot® Brand File Folders, 1/3 Cut, Letter Size, 30%...
★★★★★ (4031)
\$13.59 each

[View Details](#) >

Office Depot® Brand Sticky Notes Value Pack, 3" x 3", ...
★★★★★ (487)
\$20.39 each

[View Details](#) >

EXHIBIT I-9



End Tab Pocket Folders with Reinforced Tab

\$32.81

Pay in 4 interest-free installments for orders over \$50.00 with [shop Pay](#) [Learn more](#)

One or two handy pockets on the inside safely hold small or loose materials such as X-rays or photos. Pockets open on the top and inside edges for easy filing and are sealed on the outer edges.

- The industry standard for efficient shelf filing
- Pocket on inside front panel safely holds small or loose items
- Reinforced tab provides extra strength where it's needed most
- Straight-cut end tab for color-coded indexing
- Contains 10% recycled content, 10% post-consumer material

Color: Manila



Size

Letter

Set of

50 25

Quantity

- 1 +

ADD TO CART

Details ▾

Shipping & Returns ▾



EXHIBIT I-10



PRODUCTS ▾

INSPIRATION

HISTORY

ABOUT



Manila File Jackets, Flat-No Expansion, Straight-Cut Tab

\$38.03

Pay in 4 interest-free installments for orders over \$50.00 with [shop Pay](#) [Learn more](#)

Full-height side gusset keeps materials from slipping out. Great for taking files out of the office. Choose flat or three different expansions. Select reinforced tabs for frequently used files.

- Great for taking files out of the office
- Closed sides keep papers secure
- Reinforced tab provides extra strength where it's needed most
- 11 point manila stock for everyday use
- Expands 1-1/2" for greater storage capacity

Color: Manila



Size

Letter
 Legal

Set of

100

Quantity

- 1 +

ADD TO CART



Filed By: jmtaylor@kslaw.com, Filed Date: 10/12/22 1:18 AM, Submission Status: Approved

Details ▾

Shipping & Returns ▾

EXHIBIT I-11



PRODUCTS ▾

INSPIRATION

HISTORY

ABOUT



TUFF® Expanding Wallets, 5-1/4-Inch Expansion

\$77.33

Pay in 4 interest-free installments of \$19.33 with [shop Pay](#) [Learn more](#)

Protect important documents in transit with Smead® toughest extra durable, extra wide wallets. Top tab file folders fit neatly inside without bulging out the sides. Gusset extends into front and back panels twice as far as standard wallets so it simply won't rip out.

- Protects documents in your office or on the go
- Fully lined gussets reinforced with tear-resistant material provides extra strength at critical points
- Expands up to 5-1/4" for greater storage capacity
- Extra wide to accommodate letter-sized folders and papers

Color: Redrope



Size

Set of

Quantity

- 1 +

ADD TO CART



Details ▾

Shipping & Returns ▾

EXHIBIT I-12

US Paper Sizes

North America, including the US, Canada and parts of Mexico, is the only area of the first world that doesn't use the ISO 216 standard paper sizes, instead they use Letter, Legal, Executive and Ledger/Tabloid paper sizes and those that have been formalised in [ASME Y14.1 - Drawing Sheet Size & Format](#). ANSI also incorporates the ISO 216 standard with [ASME Y14.1M - Metric Drawing Sheet Size & Format](#) [US Envelope Sizes](#) are also non ISO 216 and are listed on [this page](#). The following table gives the sizes in millimeters and inches of the Commonly used American paper sizes.

Size	Width x Height (mm)	Width x Height (in)	Aspect Ratio
Half Letter	140 x 216 mm	5.5 x 8.5 in	1:1.5455
Government Letter	203 x 254 mm	8.0 x 10.0 in	1:1.25
Letter	216 x 279 mm	8.5 x 11.0 in	1:1.2941
Junior Legal	127 x 203 mm	5.0 x 8.0 in	1:1.6000
Government Legal	216 x 330 mm	8.5 x 13.0 in	1:1.5294
Legal	216 x 356 mm	8.5 x 14.0 in	1:1.6471
Ledger / Tabloid	279 x 432 mm	11.0 x 17.0 in	1:1.5455

Of the American sizes Letter, Legal and Ledger/Tabloid are the most used in office environments. Half Letter is often used for personal letter writing, notepads and diaries. Government Letter is still widely available, however Government Legal (known as Long Bond in the Phillipines) is much less common nowadays.

The following page discusses [North American paper weights](#) in detail, as it is useful to know how weight as well as size and [stock type](#) affects your choice of paper. [The difference between US Letter and Legal Paper sizes and international A4 is discussed here](#), however it is important to say that Letter is effectively the equivalent to A4 size in the USA.

ANSI Standard Paper Sizes

ANSI ([American National Standards Institute](#)) defined a regular series of paper sizes based around the Letter (8.5" x 11") format, with this becoming the A size and larger sizes being B,C,D & E. Surprisingly these ANSI standard sizes were defined in 1992 well after the ISO standard sizes. Letter format paper was originally defined as a national standard in 1921 and was formally adopted by the US government in the 1980's. ANSI A sized paper is commonly referred to as Letter and ANSI B as Ledger or Tabloid.

Unlike the ISO standard sizes which have the single aspect ratio of 1:root2, ANSI standard sizes have two aspect ratios 1:1.2941 and 1:1.5455 which means that enlarging and reducing between the sizes is

not as easy as with the ISO sizes and leaves wider margins on the enlarged/reduced document.

Barcode: 4298092-02 A-570-147 INV - Investigation

Size	Width x Height (mm)	Width x Height (in)	Aspect Ratio	Closest ISO
A	216 x 279 mm	8.5 x 11.0 in	1:1.2941	A4
B	279 x 432 mm	11.0 x 17.0 in	1:1.5455	A3
C	432 x 559 mm	17.0 x 22.0 in	1:1.2941	A2
D	559 x 864 mm	22.0 x 34.0 in	1:1.5455	A1
E	864 x 1118 mm	34.0 x 44.0 in	1:1.2941	A0

B+ (Super B)

B Plus, or Super B as it is sometimes known, has dimensions of 13" x 19" (330mm x 483mm). This size is the ANSI B size with a 1" margin for print bleed all the way round. It is sometimes known as [A3+ or Super A3](#) in countries that use ISO 216 paper sizes. European manufacturers sometimes give this size as 330mm x 482mm.

Architectural Paper Sizes

North America also has a special series of paper sizes defined for architectural purposes, in general these have aspect ratios of 4:3 or 3:2. These aspect ratios are very similar to the aspect ratio used for computer screens.

The following table gives details of the sizes for architectural paper.

Size	Width x Height (mm)	Width x Height (in)	Aspect Ratio
Arch A	229 x 305 mm	9.0 x 12.0 in	4:3
Arch B	305 x 457 mm	12.0 x 18.0 in	3:2
Arch C	457 x 610 mm	18.0 x 24.0 in	4:3
Arch D	610 x 914 mm	24.0 x 36.0 in	3:2
Arch E	914 x 1219 mm	36.0 x 48.0 in	4:3
Arch E1	762 x 1067 mm	30.0 x 42.0 in	7:5

Some Internet sites also list Arch E2 at 26.0 x 38.0 in (660 x 965 mm) and Arch E3 at 27.0 x 39.0 in (686 x 991 mm), however we can find no references to these sizes on the ANSI site, which lists A, B,

C, D, E and E1. Additionally these two sizes don't have simple aspect ratios which are a common feature of the Arch series paper sizes. The Arch E3 size is available to buy from some paper suppliers where it is just referred to as 27 x 39 and Arch E2 doesn't appear to be available at all.

Other US Paper Size Standards

Other paper size standards issued by ANSI include:

- [ANSI INCITS 151-1987](#) - Bond Papers and Index Bristols - Common Sheet Sizes
- [ANSI INCITS 96-1983](#) - Forms, Paper Sizes for Single-Part Continuous Business

US Paper Sizes - Quick Lookup

Select the paper size from the 'Size' selector and the unit from the 'Unit' selector - the dimensions will be shown in the dimensions box.

Size	Unit	Dimensions		
	in		is	8.5 x 11.0

EXHIBIT I-13

Harmonized Tariff Schedule of the United States Revision 10 (2022)

Barcode: 4298092-02-A-559-147-ENT Investigation -
Annotated For Statistical Reporting Purposes

X
48-24

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
4820		Registers, account books, notebooks, order books, receipt books, letter pads, memorandum pads, diaries and similar articles, exercise books, blotting pads, binders (looseleaf or other), folders, file covers, manifold business forms, interleaved carbon sets and other articles of stationery, of paper or paperboard; albums for samples or for collections and book covers (including cover boards and book jackets) of paper or paperboard:				
4820.10		Registers, account books, notebooks, order books, receipt books, letter pads, memorandum pads, diaries and similar articles:				
4820.10.20		Diaries, notebooks and address books, bound; memorandum pads, letter pads and similar articles.....		Free ^{1/}		25% ^{2/}
	10	Diaries and address books.....	No.			
	20	Memorandum pads, letter pads and similar articles.....	No.			
	30	Sewn composition books with dimensions of 152.4-381 mm (6" - 15"), inclusive (small side) X 222.5-381 mm (8.75" -15"), inclusive (large side).....	No.			
	40	Other note books with dimensions of 152.4-381 mm (6" - 15"), inclusive (small side) X 222.5-381 mm (8.75" -15"), inclusive (large side).....	No.			
	60	Other.....	No.			
4820.10.40	00	Other.....	No.....	Free ^{1/}		25%
4820.20.00	00	Exercise books.....	No.....	Free ^{1/}		25%
4820.30.00		Binders (other than book covers), folders and file covers..		Free ^{1/}		35%
	20	Looseleaf binders.....	kg			
	40	Other.....	kg			
4820.40.00	00	Manifold business forms and interleaved carbon sets.....	kg.....	Free ^{1/}		26.5%
4820.50.00	00	Albums for samples or for collections.....	No.....	Free ^{1/}		30%
4820.90.00	00	Other.....	kg.....	Free ^{1/}		35%
4821		Paper and paperboard labels of all kinds, whether or not printed:				
4821.10		Printed:				
4821.10.20	00	Printed in whole or in part by a lithographic process....	kg.....	Free ^{1/}		88¢/kg ^{2/}
4821.10.40	00	Other.....	kg.....	Free ^{1/}		35%
4821.90		Other:				
4821.90.20	00	Self-adhesive.....	kg.....	Free ^{1/}		40%
4821.90.40	00	Other.....	kg.....	Free ^{1/}		30%
4822		Bobbins, spools, cops and similar supports of paper pulp, paper or paperboard (whether or not perforated or hardened):				
4822.10.00	00	Of a kind used for winding textile yarn.....	kg.....	Free ^{1/}		43%
4822.90.00	00	Other.....	kg.....	Free ^{1/}		35%

Harmonized Tariff Schedule of the United States Revision 10 (2022)

Barcode: 4298092-02-A-539-147-5NTW Investigation -
Annotated for Statistical Reporting Purposes

X

Endnotes--page 48 - 26

1/ See 9903.88.03.

2/ See 9903.90.08.

3/ Imports under this provision may be subject to Federal Excise Tax (26 U.S.C. 5701).

4/ See 9903.88.15.

5/ See 9903.88.67.

6/ See 9903.88.66.

EXHIBIT I-14

**U.S. IMPORTS OF BINDERS (OTHER THAN BOOK COVERS), FOLDERS AND FILE COVERS:
FOLDERS AND FILE COVERS**

Country	Quantity (Pounds)			January-June	
	2019	2020	2021	2021	2022
China	30,980,549	18,531,795	10,952,312	6,480,711	8,865,757
India	5,284,428	4,608,782	6,958,968	3,684,832	4,747,097
Vietnam	1,809,536	9,173,413	13,970,032	6,725,836	17,495,957
Total Subject Imports	38,074,513	32,313,991	31,881,311	16,891,378	31,108,811
Mexico	45,487,062	29,895,551	32,324,615	13,586,729	15,562,216
Total All Other Imports	2,884,031	1,790,913	1,639,091	777,258	1,175,504
Total Imports	86,445,607	64,000,455	65,845,017	31,255,366	47,846,531

Country	C.I.F. Value (US \$)			January-June	
	2019	2020	2021	2021	2022
China	48,631,809	24,199,009	17,541,372	9,953,530	14,800,732
India	5,991,243	5,102,163	7,908,129	4,039,591	5,711,436
Vietnam	3,264,896	19,546,231	24,290,875	12,392,026	25,468,770
Total Subject Imports	57,887,948	48,847,403	49,740,376	26,385,147	45,980,938
Mexico	60,285,261	38,453,880	39,332,686	16,718,261	21,709,224
Total All Other Imports	11,363,952	9,257,411	11,042,092	5,153,134	7,273,769
Total Imports	129,537,161	96,558,694	100,115,154	48,256,542	74,963,931

Country	C.I.F. Value Per Pound			January-June	
	2019	2020	2021	2021	2022
China	1.57	1.31	1.60	1.54	1.67
India	1.13	1.11	1.14	1.10	1.20
Vietnam	1.80	2.13	1.74	1.84	1.46
Total Subject Imports	1.52	1.51	1.56	1.56	1.48
Mexico	1.33	1.29	1.22	1.23	1.39
Total All Other Imports	3.94	5.17	6.74	6.63	6.19
Total Imports	1.50	1.51	1.52	1.54	1.57

Source: USITC Dataweb HTS No. 4820.30.0040.

Total: Vietnam, China, and India

				January-June	
	2019	2020	2021	2021	2022
Pounds	38,074,513	32,313,991	31,881,311	16,891,378	31,108,811
CIF Value	57,887,948	48,847,403	49,740,376	26,385,147	45,980,938
Average Value	1.52	1.51	1.56	1.56	1.48

EXHIBIT I-15

EXHIBIT:
U.S. PRODUCERS OF PAPER FILE FOLDERS

U.S. Producers of Paper File Folders

1. Smead Manufacturing Company, Inc.
Address: 600 Smead Blvd, Hastings, MN 55033
Website: <https://www.smead.com>
Telephone: (651) 438-2034
Contact: Casey Avent
Email: casey.avent@smead.com

2. TOPS Products LLC
Address: 184 Shuman Blvd. Ste. #130, Naperville, IL 60563
Website: <https://www.tops-products.com>
Telephone: (630) 821-3145
Contact: Dave Garber
Email: david.a.garber@tops-products.com

3. BSP Filing Solutions
Address: 123 Pilsudski St, Kosciusko, MS 39090
Website: <https://bspfiling.com/>
Telephone: (800) 356-3494
Contact: Andrew Frank
Email: Andrew@bspfiling.com

4. TAB Products
Address: 605 Fourth Street, Mayville, WI 53050
Website: <https://tab.com/>
Telephone: 888-822-9777
Contact: Keith Weyer
Email: kweyer@tab.com

5. STS Filing Products, Inc.
Address: 1100 Chandler St, Montgomery, AL 36104
Website: <https://www.sts-sys.com/>
Telephone: (334) 265-8786
Contact: Watkins Johnston III
Email: wjohnston@sts-sys.com

6. RD Thompson
Address: 1 Madison Street, Loudonville, OH 44842
Website: <https://rdthompsonpaper.com/>
Telephone: (419) 994-3614
Contact: Thomas Thompson
Email: info@rdthompsonpaper.com

EXHIBIT I-16

EXHIBIT:
**PRODUCERS AND EXPORTERS OF PAPER
FILE FOLDERS FROM CHINA, INDIA, AND
VIETNAM**

Producers And Exporters of Paper File Folders From China, India, And Vietnam¹

A. China²

Yiwu Suntrans Import And Export

Address: No.78 Shangbo Road Yiwu, Zhejiang, China

Tel: 0579-85170178

Beijing Kang Jie Kong International

Address: Ningbo Branch Room 710 7th Floor Phase Ii, Howard Johnson Plaza

Tel: 010-64579779-222

Ningbo Guangbo Import & Export Co., Ltd.

Guangbo Industrial Park, Chehe, Shiqi, Ningbo, China 315155

Tel: (86 574)28827063

Fax: (86 574)56101654

Email: info@guangbo.net

Ningbo Guangbo Plastic Products Manufacture Co. Ltd

Building 9, Guangbo Industrial Park, Chehe Village, Shiqi Sub-District, Haishu District Ningbo, Zhejiang, 315153, China

Tel: 400-605-7422

¹ We prepared the list of producers in the subject countries using 12 calendar months of available ship manifest data. We supplemented the list with information from Petitioner's market intelligence. Information regarding the proportion of total exports to the United States accounted for by each producer is not reasonably available.

² With respect to China, although information regarding the proportion of total exports to the United States accounted for by each producer is not reasonably available, we have listed those producers/exporters (other than logistics companies) with more than two percent of the potential quantity in the searchable bills of lading containing relevant search terms. These producers/exporters account for more than 70 percent of the applicable quantities.

CRE8 Direct (Ningbo) Co Ltd

Address: No 45 West Lushan Road, Beilun, Ningbo, China

T: +86 574 86188166

Email: sales@cre8direct.net

Three-Color Stone Manufacture, Ltd.

Address: No. 199 Tianyun Road, Sheshan Town, Songjiang District, Shanghai, 201603, China

Tel: 86-21-57663665-818

Fax: 86-21-57663665-813

Email: zhanglei@threecolorstone.com

Reco International Co.,Ltd.

Address: No.5, Xinmofan Road, Nanjing, China

Email: contact@reco-intl.com

Sbin B.V.

Address: Mapletree, Yangshan Free Trade Port No 639 Huigang Road, Yangshan Free Trade Port Area, Pudong District

Ningbo Atoz Create International Trading

Address: C15 #3 Floor, No. 299 Guanghua Road, Hi-Tech, Ningbo, 315000, China

Tel: 86-574-86909601

Yiwu Shenghua Printing Co., Ltd

Address: No.520 Tongshan Road, Yiting Town, Yiwu City, Zhejiang, China

Tel: +86-15673346210

Email: Sales10@zgwengu.com

Risen Deal Trading Corp

Address: Rm11-1 No.1 Jiali Square Ningbo Hi-Tech Zone, Yinzhou District, Ningbo Zhejiang

Tel: +8657487050766

Dongguan Xuchun Stationery Co., Ltd.

Address: Tiehe Road, Tiesong village, Qingxi Town, Dongguan City, Guangdong Province, China

Guangdong Fuhai Stationery Co., Ltd

Address: Baoan Industry Transferred District, Longchuan, Heyuan, Guangdong, China

Jiaxing Lion Import & Export Co., Ltd

Address: #114 Of Building #7 ,Zhong-An Gateway Trade Park, Jiaxing 314000 Zhejiang, China.

Tel: +86 173 9573 6571

Email: info@lion-paper.com

Shenzhen Jiaqing Youxuan Trading

Address: 1515 15th F Huizhou Bldg 2011 Yanhe He Road, Wenjin Community N Anhu St Luohu District, Shenzhen

Wuhan Leading Union Co.,Ltd.

Address: 189# Wubei Road, Dongxihu District, Wuhan City, Hubei Province, China

Zhejiang Dongxiao Stationery Co., Lt

Address: Jichang Road, Xinqiao Town, Luqiao District, Taizhou City, Zhejiang Taizhou, China

Tel: +86-0576-82668822

Email: Leo@chinadongxiao.com

Ningbo Meteam Import And Export Co.

Address: No.08, Jinqiao Road Xinxing Industrial

Tel: 86-574-83512303

Shuang Jiang Stationery Limited

Address: Unit 2,4 F Fook Hong Industrial Building, No. 19 Sheung Yuet Rd Kowloon Bay,
Kowloon Hong Kong

Email: enquiry@fengze.com.hk

Ganzhou Xuantai Trading Co., Ltd.

Address: 178 Xijiang Avenue, Xijiang Town, Huichang County, Ganzhou City, Jiangxi Province

Bouli Asia Company Limited

Address: Flat/Rm 1402b 14/F, The Belgian Ba Hong Kong . Hong Kong, China

Tel: +852 2152 0278

Chi Shing Printing & Packaging Co.,

Address: Floor 4 ,Building 3, Delux Industry Park, Pinshan District, Shenzhen Gd China

Sanhua International Trading Co., Li

Address: 13 F., Harbour Commercial Building, 122-124 Connaught Road

Phone: +852 3176 7922

Ningbo Heyi-Stationery Company Limi

Address: New Industrial Zone-Part A, Ninghai, 315600, Ningbo

Chi Shing Cosin (Shen Zhen) Company

Address: Floor.401-501 And Part Of Floor 1, Building 3, Shenzhen Tonglixing Industrial Co.
Ltd . No. 8 Lanzhuesa

Yiwu Hantian Trade Co., Ltd.

Address: Floor 1, Unit 5 ,No. 19 Building, Yian District, Houzhai Street, Yiwu, China

Fax: +86 579 5125481

Dongguan Hb Trading Company Ltd

Address: 2nd Floor Juda Building Zhongli Rd, Nancheng District, Dongguan City

Hong Kong Bestime Group Company Limited

Address: Flat 03,15/F Carnival Comm Bld G 18 Java Rd, North Point, Hong Kong

Wenzhou Gangtong Stationery & Crafts

Address: No. 62-68, Qiandang Industrial Zone, K Unyang, Pingyang

Tel: +86-18066359535

Email: Sales19@jmzglobal.com

Shanghai Quan Wei Stationery Co Ltd

Address: No. 5991 Boyuan Road, Anting County, Jiading District, Shanghai

Fax: +86-021-39597689

Fastco (Shanghai)Trading Co., Ltd

Address: Tong Da Chuang Ye, Tian Shan Road, Lane 600 Building One, 7th Floor, Shanghai, China 200051

Tel: +86 21 62621763

Yiwu Keming Supply Chain Management

Address: 1/F, Building 2, 251# Shenzhou Road, Houzhai

General Industrial Co

Address: Room 1-2, 12/F, Knutsford Comm. Bld G. 4-5 Knutsford Terrace, Tsimshatsui,

U&Me Pack Co.,Ltd

Address: No. 288 Jinsong Yi Road

Tel: 0086-13817722792

Email: Enquiry@unmepack.com

Shanghai Duoruisi Electronic Com

Address: 1-2 Floor, No. 6395 Hutai St Baoshan Dist, Shanghai China

Cailan Printing Packaging Product

Address: 4th Floor A5 Building New Guiyuan, No. 302 Guiyue Road

Tel: +86 135 3764 5510

Email: info@printingcailan.com

Juvo Plus China Inc

Address: Unit 2706 Room 101 No. 1168 Xingang East Road Guangzhou, Guangzhou Haiyuan Trade Co., Ltd, No. 106, Feng Ze East Road, Nansha Dist., Guangzhou

Dongguan Jiemao E-Commerce Co., Ltd

Address: Room 505, No.2 Humen New Link Road, H Umen Town, Dongguan

B. India

Cellpage Ventures Pvt Ltd

Address: 302, Vishwa Nanak, Ict Link Rd, Chakala, Andheri (East)

Tel: +91-22-28381707

Email: info@cellpage.co.in

Century Distribution Systems Inc

Address: Godrej Coliseum, Off No. 701, 7th Flr. A Wing, Sion(E)

Tel: +91 22 61510000 & +91 22 61510150

Champs

Corporate Address : 408, Nirman Kendra, Famous Studio Lane,

Off. Dr. E Moses Road, Mahalaxmi (West), Mumbai- 400011.

Tel: +91 22 – 2269 1063

Email: info@champs.in, export@champs.in

Damco India Pvt Ltd (In)

Address: Bhavani Shankar Road Mumbai Mh 400 028

Tel: +91 44 33402399

GDN Export Private Limited

Address: 8/1391-A, Sowdambika Nagar Pandiyan Nagar, P.N. Road

Tel: +91 9865222900

Email: info@gdnexport.com

Ideas afresh Inc

Address: 100 4-Wz Titar Pur, Tagore Garden, New Delhi

Tel: +91 8048077490

Jagdamba Printers

Address: No. 13, Ganesh Vihar- A, Nandi Ka Phatak, Benar Road, Jamna Puri, Jaipur-302013, Rajasthan, India

Tel: +91-8047820699

Kokuyo Riddhi Paper Products Privat

Address: Gut No. 108 & 82, Village Sawarkhand Jawahar Road, P.O. Manor Thane 401403

Tel: +91 9004816659

Gmail: amanparekh@gmail.com

Magic International Pvt. Ltd.

Address: Plot No. 26E, Sector 31 (Industrial Area), Site IV, Greater Noida – 201306, India

Tel: +91 9717977657

Email: info@magicpaper.net

Mehta Print Arts Pvt. Ltd.

Address: 64-65 Udyog Vihar Industrial Phase IV, Sector 37, Gurgaon 122001, India

Tel: +91 1244873800

Email: info@mpaworld.com

Navneet Education, Ltd.

Address: Bhavani Shankar Road Mumbai Mh 400 028 India

Tel: +91 22 66626565

Email: inquiry@navneet.com

Navneet Education Ltd.

Address: 2-E/23 Orion Plaza, 2nd Floor, Jhnadewala Extension, New Delhi 110055, India

Tel: +91 2361 0170

Email: inquiry@navneet.com

National Industries

Address: K-30, Kirti Nagar, New Delhi, Delhi 110015, India

Phone: +91 98991 29902

Paper Fine School and Office Stationery

Address: Giriraj Horizon, Office 202. Building 2. Empire Estate, Road, Sector 20, Kharghar, Navi Mumbai, Maharashtra 410210, India

Tel: +91 98207 36886

Sabharwal International Stationary

Address: 87/ 18/ 2, Udhyog Nagar, Mundka Industrial Area, New Delhi - 110 041, INDIA

Tel: +91.74.2868.8288

Email: contact@sabinternational.net, sabinternational@gmail.com

Standard Prime Exports

Address: 78 Ranipura, Indore, India, 452007

Seet Kamal International

Address: 3a, Kamani Road Jhotwara Ind. Area

Tel: +91 141 234 4490

Gmail: info@seetkamal.com

Shakti Envelopes India Private Limited

Address: Next To Paper Box, Mahakali Caves Road, Andheri East

Tel: +91 22 2687 9191/92/93/94

Email: shaktienvelopes@yahoo.com

Vital Stationery

Address: VPPPL 1820, Portia road, Sector 35, Sricity SEZ, Satyavedu Mandal, Chitoor District, Andhra Pradesh - 517588. India.

Tel: +91 7993453744, +91 7680075847.

Email: info@vitalstationery.com

Zebra Office Files

Address: 4/657 AKK Cross Road, Cheralai Bazar,

Kochi-682002, Kerala, India

Tel: +919447027307

Email: exports@zebrafiles.com

C. Vietnam

Chuangyuan Vietnam Co., Ltd

Address: E4 Lot, A Part Of E 5 Lot, Namdong Phu Industrial Zone, Binh Phuoc Province, Vietnam

Tel: (84-274) 2224 088

Fax: (84-271) 2224 086

Deli Vietnam Co Ltd

Address: Lot CN06-4 and CN13-2 Yen Phong Industrial Zone, Yen Bac, Ninh Province

Fuda Stationery (Vietnam) Factory

Address: Lot D9-D10 Viet Huong Industrial Park, Thuan An District, Binh Duong Province, Vietnam

Tel: + 84 0274 3716570

Guangbo Viet Nam Company, Ltd

Address: Lot C8-1 & C8-2, Dai Dong - Hoan Son Industrial Zone, Hoan Son Bac Ninh, Vietnam

Tel: +84 385340544

Huashen Paper Product Co. Ltd

Address: Tienson Mo Rong Industrial Zone Tan Hong Tuson

Teamade Stationery Vietnam Co Ltd

Address: Lot Cn10-3 Tan Truong Industrial Park Tan Truong Commune Cam Giang District, Hai Duong, Vietnam

Tel: 886-2-8921-1077

Email: eric.chi@teamade.com.tw

Three Color Stone Manufacture

Address: No. 199 Tianyun Road Sheshan Town

Tel: 86-21-57663665-818

Gmail: zanglei@threecolorstone.com

Vietnam Cailan Industy Co Ltd

Address: Chau Son Industrial Park Le Hong Phong W Phu Ly C

Zhong Xin Hoa Sen Co., Ltd

Address: F2CP + VCC, Trung Luog, Binh Luc, Ha Nam

Tel: +1 226-388-3073

EXHIBIT I-17

EXHIBIT:
**U.S. IMPORTERS OF PAPER FILE FOLDERS
FROM CHINA, INDIA, AND VIETNAM**

U.S. Importers Of Paper File Folders From The Subject Countries³

A. China⁴

Dollar General Corporation

Address: 100 Mission Ridge, Goodlettsville, TN 37072-2170

Tel: (615) 855-4000

Email: ekauffman@dollargeneral.com

Bangkit USA Inc.

Address: 10511 Valley Boulevard, El Monte, CA 91731

Tel: (626) 452-8751

Email: info@bazicproducts.com

Educational Products Inc

Address: 1342 North I-35 East Carrollton, TX 75006

Tel: (800) 365-5345

Golden State FC LLC

Address: 9031 Lurline Ave., Chatsworth, CA 91311

Idea Stream Consumer Products

Address: 812 Huron Road, Suite 390, Cleveland, OH 44115

Tel: (216) 459-2400

³ We prepared the list of importers of the subject merchandise using consignee information from searches using 12 calendar months of available ship manifest data.

⁴ With respect to China, although information regarding the proportion of total imports into the United States accounted for by each importer is not reasonably available, we have listed those importers (other than logistics companies) with more than two percent of the potential quantity in the searchable bills of lading containing relevant search terms. These importers account for more than 70 percent of the applicable quantities.

School Specialty

Address: 100 Paragon Parkway Mansfield, OH 44903

Tel: (419) 589-2100

Email: rhonda.buss@schoolspecialty.com

Smead Mfg Co.

Address: 851 Smead Road, Logan, OH 43138

Tel: (740) 385-5601

Dollar Tree Distribution Inc.

Address: 500 Volvo Parkway, Chesapeake, VA 23320

Tel: (757) 321-5000

Email: customerservice@dollartree.com

Michael Stores Procurement Co.

Address: 8000 Bent Branch Drive, Irving, TX 75063

Tel: (972) 409-1300

Zalf Spa

Address: 1449 W Industrial Park St., Covina, CA 91722

Staples - The Office Superstore

Address: 500 Staples Drive, Framingham, MA 01702

Tel: (508) 253-5000

Email: maharukh.patel@staples.com

School Specialty

Address: W6316 Design Dr., Greenville, WI 54942

Tel: (920) 734-5712

Email: Joseph.Lefebber@schoolspecialty.com

Me And My Big Ideas

Address: 17777 Newhope Street, Fountain Valley, CA 92708

Tel: (949) 583-2065

Email: customerservice@meandmybigideas.com

U Brands, LLC

Address: 27432 Calle Arroyo, San Juan Capistrano, CA 92675

Tel: (612) 865-1132

Current Media Group LLC

Address: 1025 E. Woodmen Rd, Colorado Springs, CO 80920

Tel: (800) 848-2848

Clementine Paper Inc

Address: 5870 W Jefferson Blvd, Studio C, Los Angeles, CA 90016

Orange Circle Studio

Address: 8687 Research Drive, 150 Irvine, CA 92618

Tel: (949) 727-0800

Email: info@orangecirclestudio.com

Polyfields Inc.

Address: 4500 Executive Drive, Suite 110-6, Naples, FL 34119

Idea Stream Consumer Products

Address: 812 Huron Rd. Suite 390, Cleveland, OH 44115

Tel: (216) 459-2400

Ryan & Company Inc.

Address: 1942 Broadway St., Ste 314c, Boulder, CO 80302

Fastenal Co

Address: Import Traffic, 4730 N. Service Drive, Winona, MN 55987

Tel: (507) 454-5374

Brilion Inc.

Address: 879 W 190th Street, Suite 400, Gardena, CA 90248

Tel: (310) 218-2510

Email: sunny@brilion.com

Dongguan Xuchun Stationery Co., Ltd.

Address: 3923 S B Street, Stockton, CA 95206-8202

H Way Hose Inc.

Address: 15 Sparrow Lane, Roslyn, NY 11576

Comptree Inc.

Address: 18961 Arenth Avenue, City of Industry, CA 91748

Tel: (626) 912-0668

Milestone Creations LLC

Address: 15 Vermont Street, Long Beach, NY 11561

Tel: (516) 431-2336

Winco Usa Inc.

Address: 18725 E Gale Ave 250, City Of Industry, CA 91748

Tel: (973) 916-9958

Email: cs@wincous.com

Amazon.Com

Address: Gyr3 8181 W Roosevelt Street, Phoenix, AZ 85043-2356

Shenzhenshi Wenying E Commerce Company

Address: 1568 N Linden Avenue, Rialto, CA 92376-8624

Fringe Studio

Address: 6025 W. Slauson Ave, Culver City, CA 90230

Tel: (310) 390-9900

Email: hello@fringestudio.com

Luxway Inc.

Address: 32 W. Merrick Road, 2nd Fl., Valley Stream, NY 11580

Lifeguard Press

Address: 134 Beech Bend Road, Suite 100, Bowling Green, KY 42101

Tel: (270) 843-8510

Email: info@lifeguardpress.com

Esther Express Inc.

Address: 4 Bay 32nd Street, Brooklyn, NY 11214

Tel: (718) 266-2052

Fibro Source Usa Inc.

Address: 985 Old Eagle School Road, Suite 514, Wayne, PA 19087

Tel: (610) 293-3200

Cjam Industries

Address: 7324 Southwest Fwy, Ste825, Houston, TX 77074

Walmart Inc,

Address: 702 SW 8th Street, Bentonville, AR 72716-0410

Tel: (479) 273-4000

Email: executive.communications@walmart.com

Juvo Plus Inc.

Address: 245 W. Foothill Blvd., Monrovia, CA 91016

Tel: (626) 358-5100

Gartner Studios

Address: 220 East Myrtle Street, Stillwater, MN 55082

Tel: (888) 235-0484

Email: support@gartnerstudios.com

Carson Dellosa Publishing LLC

Address: 657 Brigham Rd Ste A, Greensboro, NC 27409

Tel: (800) 321-0943

Email: webhelp@carsondellosa.com

Keming Inc.

Address: 8 The Green, Suite A, Dover, DE 19901

Tel: (626) 392-8731

Ideastream Consumer Products

Address: 812 Huron Rd. Suite 390, Cleveland, OH 44115

Tel: (216) 459-2400

Email: support@vaultz.com

School Start Inc.

Address: 1317 43 Ave Se Calgary, Ab T2G 2A3

Tel: (800) 580-1868

Fax: 1-800-580-1890

Email: info@schoolstart.ca

Top Point International Usa Inc.

Address: 30 N Gould St Ste R, Sheridan, WY 82801

B. India

99 Cents Only Stores LLC

Address: 4000 Union Pacific Avenue, Commerce, CA 90023

Tel: (323) 980-8145

Email: customerservice@99only.com

Dynamic Solutions Unlimited,

Address: 102 Mulberry Lane, Media, PA 19063

Tel: (610) 627-9904

Educational Products Inc

Address: 4100 N Sam Houston Pkwy, Suite 240, Houston, TX 77086

Tel: (832) 327-6300

H R K Group Inc.

Address: 12631 E. Imperial Hwy, Ste F-130, Santa Fe Springs, CA 90670

Tel: (323) 826-9508

Email: Info@hrkgroupinc.com

iScholar Inc.

Address: 250 Heartland Blvd., Edgewood, NY 11717

Tel: (631) 885-8032

Email: sales@ischolarinc.com

Maruti Distributors Inc.

Address: 140 Ethel Road, West Unit H, Piscataway, NJ 08854

Tel: (218) 474-0590

Email: info@marutigloballlc.com

New Pride Corporation

Address: 4333 Veterans Memorial Highway, Ronkonkoma, NY 11779

Tel: (631) 737-4444

Email: info@prideproducts.com

Ocean State Jobbers Inc.

Address: 375 Commerce Park Road, North Kingston, RI 02852

Tel: (401) 295-2672

Email: webmaster@osjl.com

Staples Brand Group

Address: 500 Staples Drive, Framingham, MA 01702

Tel: (508) 253-5000

Email: maharukh.patel@staples.com

Victorian Trading Co

Address: 15600 West 99th Street, Lenexa, KS 66219

Tel: (913) 438-3995

Email: Wholesale@VictorianPaperCo.com

Walmart Inc,

Address: 702 SW 8th Street, Bentonville, AR 72716-0410

Tel: (479) 273-4000

Email: executive.communications@walmart.com

C. Vietnam

Bangkit USA, Inc.

Address: 10511 Valley Boulevard, El Monte, CA 91731

Tel: (626) 452-8751

Email: info@bazicproducts.com

Barnes & Noble Distribution, Inc.

Address: One Barnes & Noble Way, Monroe, NJ 08831

Tel: (732) 656-7200

Email: amilevoj@bn.com

Cascade School Supplies, Inc.

Address: 1 Brown Street, North Adams, MA 01247

Tel: (413) 663-3716

Email: service@cascadeschoolsupplies.com

File-Ez Folder, Inc

Address: 4111 E Mission Ave Spokane, WA 99202

Tel: (509) 534-1044

Fringe Studio

Address: 6025 W. Slauson Ave, Culver City, CA 90230

Tel: (310) 390-9900

Email: hello@fringestudio.com

Graphique De France, Ltd.

Address: 9 State Street, Woburn, MA 01801

Tel: (781) 935-3405

Email: customerservice@graphiquedefrance.com

Hudson Envelop Of New Jersey Co

Address: 185 Legrand Ave., Northvale, NJ 07647

Tel: (201) 567-6666

Kurtz Bros

Address: Goldenrod Whse 2018 Daisy Street Ext, Clearfield, PA 16830

Tel: (814) 765-6561

Lifeguard Press

Address: 134 Beech Bend Road, Suite 100, Bowling Green, KY 42101

Tel: (270) 843-8510

Email: info@lifeguardpress.com

Munday Investments Limited

Address: 12432 Foothill Blvd., Sylmar, CA 91342

Office Depot Inc.

Address: 6600 North Military Trail, Boca Raton, FL 33496-2434

Tel: (561) 438-4800

Email: customer.relations@officedepot.com

S. P. Richards Company

Address: 440 Interstate West Pkwy, Suite 10, Lithia Springs, GA 30122

Tel: (888) 436-6881

Spark Innovations LLC

Address: 4550 Pearson S., Long Island City, NY 11101

Staples - The Office Superstore

Address: 500 Staples Drive, Framingham, MA 01702

Tel: (508) 253-5000

Email: maharukh.patel@staples.com

Tcs Distribution Center Manager

Address: 500 Freeport Parkway Coppell Tx 75019-3863 Coppell Tx 75019

Tel: (972) 538-6000

Test Rite Products Corp

Address: 1900 S. Burgundy Place, Ontario, CA 91761

Tel: (909) 605-9899

Email: Gene@mdifurniture.com

Tops Products LLC

Address: 39324 LBJ Freeway, Dallas, TX 75237

Tel: (800) 282-7261

Email: topscs@tops-products.com

U Brands, LLC

Address: 3309 W 600 N, Smead Blvd., Cedar City, UT 84721

Tel: (435) 586-4314

Veyer, LLC

Address: 6600 North Military Trail, Boca Raton, FL 33496

Tel: (561) 438-4800

Email: joy.belnavis@officedepot.com

EXHIBIT I-17A

EXHIBIT:
**LEADING PURCHASERS OF PAPER FILE
FOLDERS IN THE U.S. MARKET**

Leading Purchasers Of Paper File Folders In The U.S. Market

- 1. []
 Address: []
 Website: []
 Contact: []
 Telephone: []
 Email Address: []

- 2. []
 Address: []
 Website: []
 Contact: []
 Telephone: []
 Email Address: []

- 3. []
 Address: []
 Website: []
 Contact: []
 Telephone: []
 Email Address: []

- 4. []
 Address: []
 Website: []
 Contact: []
 Telephone: []
 Email Address: []

- 5. []
 Address: []
 Website: []
 Contact: []
 Telephone: []
 Email Address: []

- 6. []
 Address: []
 Website: []
 Contact: []
 Telephone: []
 Email Address: []

- 7. []
 Address: []
 Website: []

Contact: []
Telephone: []
Email Address: []

8. []
Address: []
Website: []
Contact: []
Telephone: []
Email Address: []

9. []
Address: []
Website: []
Contact: []
Telephone: []
Email Address: []

10. []
Address: []
Website: []
Contact: []
Telephone: []
Email Address: []

11. []
Address: []
Website: []
Contact: []
Telephone: []
Email Address: []

12. []
Address: []
Website: []
Contact: []
Telephone: []
Email Address: []

13. []
Address: []
Website: []
Contact: []
Telephone: []
Email Address: []

EXHIBIT I-18



[Home](#) > [Office Supplies](#) > [Folders & Filing](#) > [File Folders](#)


Smead File Folders

Sort by Best Match ∨

 Grid view ∨

∨
 ∨
 ∨
 ∨

∨

 All Filters

Brand: Smead × [Clear all](#)

Compare 



Smead File Folders, 1/3-Cut Tab, Legal Size, Manila, 100/Box (15330)

★★★★☆ 28

\$22.79

Filed By: jmtaylor@kslaw.com, Filed Date: 10/12/22 1:18 AM, Submission Status: Approved



100/Box (\$0.23/File Folder)

Barcode:4298092-02 A-570-147 INV - Investigation -



1 ▾

Add

Compare



Chat offline



Smead SuperTab Heavyweight File Folder, Oversized 1/3-Cut Tab, Letter Size, Manila, 50/Box (10401)

★★★★☆ 179



\$16.39

50/Box (\$0.33/File Folder)

1-hr pickup



1 ▾

Add

Compare



Buy More, Save More



Chat offline

Smead® File Folder, 1/3-Cut Tab, Legal Size, Assorted Colors, 100 per Box (16943)

★★★★★ 4



\$42.49

100/Box (\$0.42/File Folder)

Free delivery

 AutoRestock

Compare





Chat offline

Smead File Folders, 1/3-Cut Tab, Letter Size, Manila, 100/Box (10332)

★★★★☆ 8



\$20.29

100/Box

 AutoRestock

1

Add

Compare



Buy More, Save More



Barcode: 4298092-02 A-570-147 INV - Investigation -



Smead File Folder, 3 Tab, Letter Size, Assorted Colors, 100/Box (11953)

★★★★☆ 479



Chat offline

\$31.99

100/Box

1



Add

Compare



Smead Manila File Folder, 1/3-Cut Tab, Letter Size, Manila, 100/Box (10330)

★★★★☆ 479



\$15.49

Filed By: jmtaylor@kslaw.com, Filed Date: 10/12/22 1:18 AM, Submission Status: Approved

100/Box (\$0.16/File Folder)

Barcode:4298092-02 A-570-147 INV - Investigation -



1 ▾

Add

Compare



Chat offline

Buy More, Save More



Smead File Folders, 1/3-Cut Tab, Letter Size, Assorted Colors, 100/Box (11948)

★★★★☆ 479



\$34.49

100/Box



1 ▾

Add

Buy More, Save More

Chat offline



Smead SuperTab File Folders, 1/3 Cut, Letter Size, Multicolor, 100/Box (11961)

★★★★☆ 42



\$38.99

100/Box

Free delivery

AutoRestock

1

Add

[Compare](#)



Chat offline

Smead SuperTab File Folder, 1/3-Cut tab, Letter Size, Poly, 18 per Pack (10515)

★★★★☆ 22



\$23.69

18/Pack (\$1.32/File Folder)

1

Add

[Compare](#)



Smead File Folders, 1/3-Cut Tab, Letter Size, Maroon, 100/Box (13093)

★★★★☆ 479



\$35.89

100/Box (\$0.36/File Folder)

Free delivery

Chat offline

AutoRestock

1 ▾

Add

Compare



Smead File Folder, 1/3-Cut Tab, Letter Size, Green, 100/Box (12143)

★★★★☆ 479



~~\$25.49~~

Barcode:4298092-02 A-570-147 INV - Investigation -

100/Box (\$0.26/File Folder)


 AutoRestock

1 

Add

Compare



 Chat offline



Smead Poly File Folder, 1/3-Cut- Tab Letter Size, Red, 24 per Box (10501)

★★★★☆ 55



\$24.39

24/Box

 AutoRestock

1 

Add

Compare



Barcode:4298092-02 A-570-147 INV - Investigation -



Chat offline

File Folders, 1/3-Cut Tab, Letter Size, Assorted Colors, 100/Box (10229)

★★★★☆ 94



\$40.49

100/Box

Free delivery

 AutoRestock

1 ▾

Add

Compare



Smead® File Folder, 1/3-Cut Tab, Letter Size, Orange, 100/Box (12543)

★★★★☆ 479

Barcode:4298092-02 A-570-147 INV - Investigation -



\$31.19

100/Box (\$0.31/File Folder)

AutoRestock

1



Add



Chat offline

Compare



Smead File Folders, Reinforced 1/3-Cut Tab, Legal Size, Lavender, 100/Box (17434)

★★★★☆ 7



\$51.99

100/Box
Free delivery



1 ▾

Add

Compare



Chat offline



Smead End-Tab File Folders, Reinforced Straight-Cut Tab, Letter Size, Manila, 100/Box (24110)

★★★★☆ 61



\$25.49

100/Box (\$0.26/File Folder)

1-hr pickup

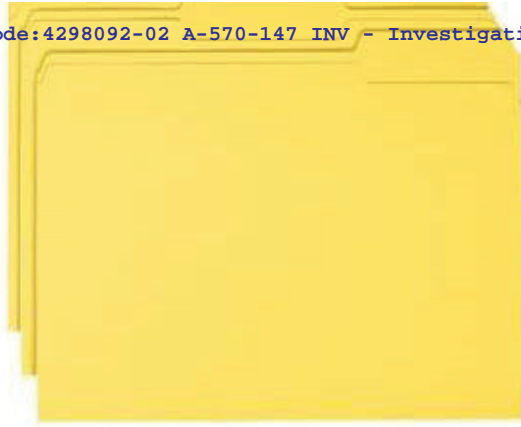


1 ▾

Add

Compare





Chat offline

Smead File Folder, 1/3-Cut Tab, Letter Size, Yellow, 100/Box (12943)

★★★★☆ 479



\$35.79

100/Box (\$0.36/File Folder)

Free delivery



1 ▾

Add

Compare



Smead End Tab Pocket Folder, Shelf-Master Reinforced Straight-Cut Tab, 1 Pocket, Letter Size, Manila, 50/Box (24115)

★★★★☆ 12



\$58.99

50/Box (\$1.18/File Folder)

Chat offline

AutoRestock

1 ▾

Add

Compare



Smead SuperTab File Folders, 1/3 Cut, Letter Size, Manila, 100/Box (10301)

★★★★☆ 122



\$25.99

100/Box (\$0.26/File Folder)

1

Add

Compare



Buy More, Save More

Chat offline



Smead Interior File Folder, 1/3-Cut Tab, Letter Size, Yellow, 100/Box (10271)

★★★★☆ 94



\$39.19

100/Box

Free delivery

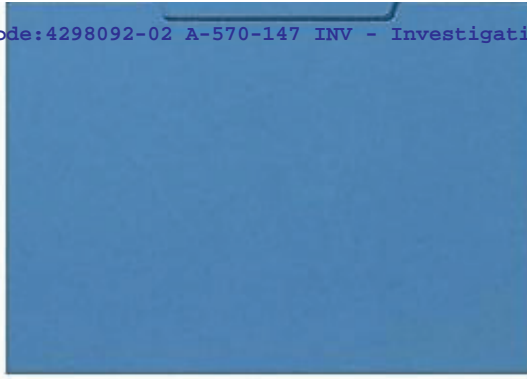
1

Add

Compare



Barcode:4298092-02 A-570-147 INV - Investigation -



Chat offline

er, 1/3-Cut Tab, Letter Size, Blue, 100/Box (12043)

★★★★☆ 479



\$30.29

100/Box (\$0.30/File Folder)

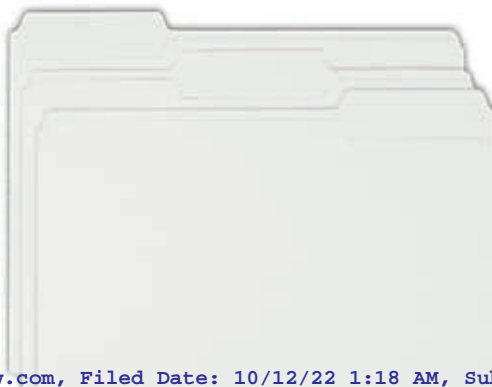
 AutoRestock

1



Add

Compare



Smead File Folders, 1/3-Cut Tab, Letter Size, White, 100/Box (12843)

★★★★☆ 479



\$24.49

Chat offline

File Folder)



1



Add

Compare



Smead File Folders, Straight-Cut Tab, Letter Size, Manila, 100/Box (10300)

★★★★☆ 9



\$27.49

100/Box (\$0.28/File Folder)



1 ▾

Add

Compare



Chat offline



Smead SuperTab Heavyweight File Folder, Oversized 1/3-Cut Tab, Legal, Manila (15401)

★★★★☆ 11



\$26.69

50/Box (\$0.53/File Folder)

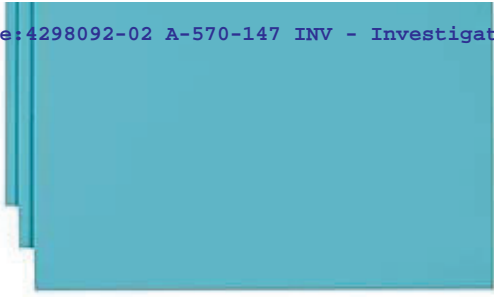
1 ▾

Add


Compare



Barcode:4298092-02 A-570-147 INV - Investigation -



Smead File Folder, 1/3-Cut Tab, Letter Size, Teal, 100/Box (13143)

 Chat offline

★★★★☆ 479



\$32.99

100/Box (\$0.33/File Folder)

 AutoRestock

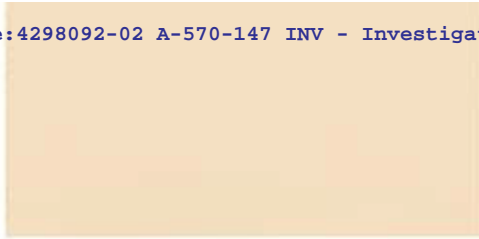
1 ▾

Add

Compare



Barcode:4298092-02 A-570-147 INV - Investigation -



Smead Manila Folder, 1/3-Cut Tab Right Position, Legal Size, 100/Box (15333)

Chat offline

★★★★★ 2



\$28.99

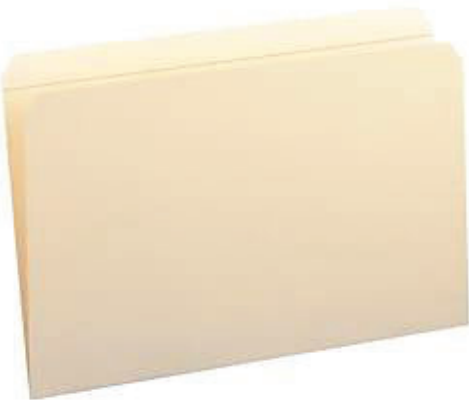
100/Box

AutoRestock

1

Add

Compare



Smead® File Folder, Reinforced Straight -Cut Tab, Legal Size, Manila, 100 Per Box (15310)

★★★★★ 5

Filed By: jmtaylor@kslaw.com, Filed Date: 10/12/22 1:18 AM, Submission Status: Approved




\$38.89

100/Box
Free delivery

 AutoRestock

1 

Add

 Chat offline



Smead Poly File Folders, 1/3-Cut Tab, Letter Size, Yellow, 24/Box (10504)

★★★★☆ 55



\$24.39

24/Box

 AutoRestock

1 

Add

Compare



Chat offline



Smead End Tab File Folder, Straight-Cut Tab, Letter Size, Manila, 100/Box (24100)

★★★★☆ 20



\$37.59

100/Box (\$0.38/File Folder)

Free delivery

 AutoRestock

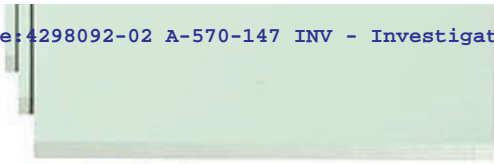
1 ▾

Add

Compare



Barcode: 4298092-02 A-570-147 INV - Investigation -



Smead Pressboard File Folder, 1/3-Cut Tab, 2" Expansion, Letter Size, Gray/Green, 25/Box (13234)

★★★★☆ 9



Chat offline

\$49.59

25/Box

Free delivery

AutoRestock

1 ▾

Add

Compare



Buy More, Save More



Smead Poly File Folder, 1/3-Cut- Tab Letter Size, Assorted Colors, 24/Box (10500)

★★★★☆ 55

Barcode:4298092-02 A-570-147 INV - Investigation -



\$21.99

24/Box (\$0.92/File Folder)

AutoRestock

1 ▾

Add

Chat offline

[Compare](#)



Smead File Folders, 1/3-Cut Tab, Letter Size, Pink, 100/Box (12643)

★★★★☆ 479



\$35.89

100/Box (\$0.36/File Folder)

Free delivery

AutoRestock

1 ▾

Add

[Compare](#)

Filed By: jmtaylor@kslaw.com, Filed Date: 10/12/22 1:18 AM, Submission Status: Approved



Buy More, Save More

Chat offline



Smead File Folder, 1/5-Cut Tab, Letter Size, Manila, 100/Box (10350)

★★★★☆ 10



\$24.49

100/Box

AutoRestock

1

Add

Compare



Buy More, Save More

Chat offline



Smead Poly File Folder with Slash Pocket, 1/3-Cut Tab, Letter Size, Assorted Colors, 30/Box (10540)

★★★★☆ 53



\$32.49

30/Box



1 ▾

Add

[Compare](#)



Buy More, Save More

Chat offline



Smead Interior File Folder, 1/3-Cut Tab, Letter Size, Red, 100/Box (10267)

★★★★☆ 94



\$33.99

100/Box (\$0.34/File Folder)

AutoRestock

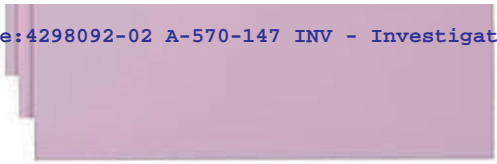
1

Add

[Compare](#)



Barcode:4298092-02 A-570-147 INV - Investigation -



Smead File Folders, 1/3-Cut Tab, Letter Size, Lavender, 100/Box (12443)

★★★★☆ 479



Chat offline

\$33.09

100/Box (\$0.33/File Folder)

 AutoRestock

1 ▾

Add

Compare



Barcode:4298092-02 A-570-147 INV - Investigation -

Smead File Folder, Letter, 1/3-Cut Tab Right Position, Letter Size, Manila, 100/Box (10333)

★★★★☆ 2



\$26.79

100/Box (\$0.27/File Folder)

Chat offline

1



Add

Compare



Smead File Folders, A-Z Index, Reinforced 1/5-Cut Tab, Letter Size, Manila, 25/Set (11777)

★★★★★ 17



\$16.99

25/Set



1

Barcode:4298092-02 A-570-147 **Add** Investigation -

Compare



Chat offline

Smead File Folder, 1/3-Cut Tab, Letter Size, Navy, 100/Box (13193)

★★★★☆ 479



\$38.29

100/Box (\$0.38/File Folder)

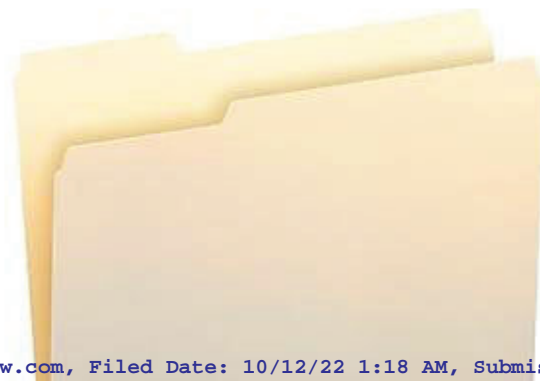
Free delivery



1

Add

Compare



Smead File Folder, 1/3-Cut Tab, Letter Size, Manila, 100/Box (10331)

★★★★★ 13



 Chat offline

100/Box (\$0.30/File Folder)

 AutoRestock

1 ▾

Add

< Page 1 ▾ of 6 >

EXHIBIT I-19




Home > Office Supplies > Folders & Filing > File Folders

Oxford File Folders

Sort by Best Match ▾  Grid view ▾

▾
 ▾
 ▾
 ▾

▾

 All Filters

× [Clear all](#)

Compare



Esselte Top Tab File Folders, 1/3 Tab Cut, Lavender, LETTER-size Holds 8 1/2" x 11", 100/Bx

★★★★★ 1



\$29.99

EXHIBIT I-20

Search

FIND YOUR STORE

Smead File Folders

651 results

By

Sort Best Match

Prev

1 2 3 4 5 6 7 8 9 10

Next

Compare



Item 207126

★★★★★ (42)

Smead® Manila Reinforced Tab Fastener Folders With Two Fasteners, 1/3 Cut, Lette...

\$70.39 / box

Qty

-

Quantity

+

Add to Cart

Add to list

Compare



Item 768310

★★★★★ (22)

Smead® Pressboard Classification Folders, 2 Dividers, Letter Size, 100% Recycled...

\$78.09 / box

Qty

-

Quantity

+

Add to Cart

Subscribe

Add to list

Compare



Item 917272

★★★★★ (47)

Smead® Expanding File Pockets, 3 1/2" Expansion, 9 1/2" x 11 3/4", 30% Recycled,...

\$78.49 / box

Qty

-

Quantity

+

Add to Cart

Subscribe

Add to list

Your Selections: Clear all

Filter By

Featured Items

Brands

Categories

Product Type

Sheet Size

Color Family

Expansion

Number Of Pockets

Number Of Fasteners

Tab Position

Fastener Capacity

Closure Type

Quantity

Quantity

Price

\$Min

\$Max

Go

Rating

More Ways to Shop

Compare

Compare

Compare

Compare



Item 572750

★★★★★ (51)

Smead® Color File Folders, Letter Size, 1/3 Cut, Purple, Box Of 100

\$34.79 / box

Qty

-

Quantity

+

Add to Cart

Subscribe

Add to list

Item 316471

★★★★★ (45)

Smead® Reinforced Tab File Folders, Letter Size, 1/3 Cut, Manila, Box Of 100

\$42.99 / box

Qty

-

Quantity

+

Add to Cart

Subscribe

Add to list

Item 935767

★★★★★ (9)

Smead® Pressboard Fastener Folders With SafeSHIELD® Fasteners, 2" Expansion, Leg...

\$118.29 / box

Qty

-

Quantity

+

Add to Cart

Subscribe

Add to list

Item 208546

★★★★★ (15)

Smead® End-Tab Folders With Fastener, 8 1/2" x 11", Letter, Manila, Box of 50

\$87.69 / box

Qty

-

Quantity

+

Add to Cart

Add to list

Compare

Compare

Compare

Compare



Item 710253

★★★★★ (26)

Smead® Expanding Reinforced Top-Tab File Jackets, 2" Expansion, Letter Size, Man...

\$80.79 / box

Qty

-

Quantity

+

Add to Cart

Subscribe

Add to list

Item 957126

★★★★★ (3)

Smead® Color End-Tab Folders With Fasteners, Straight Cut, Letter Size, Blue, Pa...

\$77.19 / box

Qty

-

Quantity

+

Add to Cart

Subscribe

Add to list

Item 116253

★★★★★ (24)

Smead® Color File Folders, Letter Size, 1/3 Cut, Brights, Box Of 100

\$35.79 / box

Qty

-

Quantity

+

Add to Cart

Subscribe

Add to list

Item 301838

★★★★★ (28)

Smead® Reinforced Tab File Folders, Legal Size, 1/3 Cut, Manila, Box Of 100

\$47.49 / box

Qty

-

Quantity

+

Add to Cart

Subscribe

Add to list

Compare

Compare

Compare

Compare