

17m 4(c)

Verne, B. Michael

To: [Redacted]
Subject: RE: 4(c) Question

You need only produce 4(c) documents related to the exercise of the option in 2006.

-----Original Message-----

From: [Redacted]
Sent: Wednesday, March 08, 2006 5:47 PM
To: Verne, B. Michael
Subject: 4(c) Question

Bruce
3/9/06

Our client has a question as to whether it needs to produce 4(c) documents related to a past, related transaction.
In 2000, our client acquired 49% of a noncorporate entity and an option to purchase the remaining 51%. The transaction was not reportable at the time, but documents with 4(c) subject matter were created to analyze the acquisition.
In 2006, our client exercised the option to acquire the remaining 51% of the noncorporate entity and now must report the transaction. Must our client produce documents with 4(c) subject matter that were created in 2000 to analyze the 2000 transaction?

Thanks for you time,
[Redacted]

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[Redacted]