

Verne, B. Michael

802.30

From: [REDACTED]
Sent: Wednesday, December 06, 2006 1:00 PM
To: Verne, B. Michael
Subject: Section 802.30

Michael,

Our client is pursuing a tender offer/going private transaction whereby it is repurchasing its own securities (actually ADRs) and taking itself private, off NASDAQ and from SEC reporting requirements. Even though it is purchasing its securities from third parties (shareholders), because it is purchasing its own securities, I believe it should be exempt under section 802.30. Is this correct?

Thanks, [REDACTED]

CORRECT.
B. Michael
12/6/06