

801.1(c)

**Verne, B. Michael**

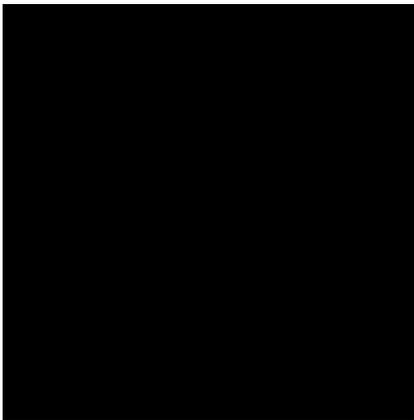
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**From:** [REDACTED]  
**Sent:** Tuesday, September 18, 2012 8:25 PM  
**To:** Verne, B. Michael  
**Subject:** HSR Question 801.1(c)(2)

Mike:

I want to confirm that the holdings of divorced husband and wife are not attributed to each other for purposes of 801.1(c)(2) (i.e., the former spouses would be considered separate UPEs). This seems intuitive, but I have never come across the issue before and I did not see anything in the informal interpretations.

Thanks



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[REDACTED]

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That is correct – they would be separate UPEs

BM  
9/19/12