

**Sheinberg, Samuel I.**

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**From:** Shaffer, Kristin  
**Sent:** Friday, August 03, 2018 5:12 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: 803.9(c)

[REDACTED]

I'm afraid this is a bright line. Two filing fees are required.

Best regards,  
Kristin

**Kristin Shaffer**  
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**From:** [REDACTED]  
**Sent:** Friday, August 03, 2018 3:17 PM  
**To:** [REDACTED]  
**Subject:** 803.9(c)

Dear Team,

A US joint venture controlled by two foreign parents intends to make a reportable acquisition valued in excess of \$168.8 million, but less than \$843.9 million. The item 5 reporting for both parents is nearly identical. One parent has a minor investment outside the JV that reports \$0.6 mm in revenues in a non-overlap code and the other reports \$0.8 mm in additional investment income under 523910. Under these circumstances where the difference in item 5 reporting is so minimal, would the PNO permit the parties to submit one filing fee?

[REDACTED]

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[REDACTED]

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