



**Part II Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Section 301(c)(2).

Blank lines for listing applicable Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ No.

Blank lines for providing information regarding loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year for the cash distribution is 2011.

Blank lines for providing other necessary information.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here  
 Signature ▶ Erik Uboe Date ▶ 1/20/12  
 Print your name ▶ EIRIK UBOE Title ▶ CFP

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	<u>Scott Ferretti</u>	<u>Scott Ferretti</u>	<u>1/19/12</u>		<u>800612168</u>
	Firm's name ▶ <u>Cravath, Swaine &amp; Moore LLP</u>	Firm's EIN ▶ <u>13-5015405</u>		Phone no. <u>(212) 474-1000</u>	
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