

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)

18 Can any resulting loss be recognized? ► N/A

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► REPORTABLE TAXABLE YEAR IS 2012.

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 ► [Handwritten Signature] Date ► 1/29/13
 Print your name ► MICHAEL B. HAINES Title ► CFO

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	SAMUEL LEVINSON	<u>[Handwritten Signature]</u>	<u>1/29/13</u>		P00636022
	Firm's name ► ERNST & YOUNG U.S. LLP	Firm's address ► 5 TIMES SQUARE, NEW YORK, NY 10036		Firm's EIN ► 34-6565596	Phone no. 212-773-3000

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054