



Dewey & LeBoeuf

Economic Sanctions Practice



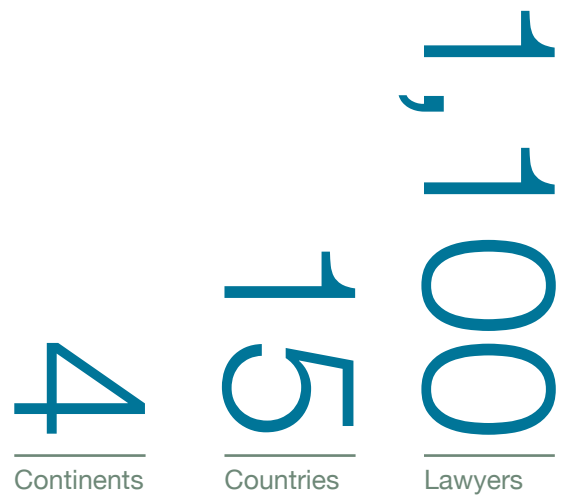
Economic Sanctions Practice

Dewey & LeBoeuf's International Trade and Compliance Group has decades of experience advising on embargoes and other economic sanctions in context of investigations, litigations and transactions.

About Dewey & LeBoeuf

Dewey & LeBoeuf is a full-service law firm providing counsel throughout the Americas, Europe, Russia/CIS, the Middle East, Asia and Africa. With more than 1,100 lawyers in major financial and commercial centers, the firm represents national and global corporations, financial institutions and government agencies in their most complex legal matters.

For additional information, please visit www.dl.com.



Economic Sanctions Practice

Dewey & LeBoeuf's International Trade and Compliance Practice Group has been a leader in helping major companies successfully address international trade compliance matters in general and issues pertaining to embargoes and other economic sanctions in particular for more than 30 years. The group consists of a highly experienced team of lawyers, economists and other trade practitioners, several of whom are former government officials. Together, they make up one of the most respected international trade groups in the world.

investigations and compliance reviews, voluntary self-disclosures, negotiating settlements with enforcement authorities, designing and implementing compliance programs and related training, preparing and prosecuting license applications, and counseling firms on compliance and licensing matters.

As a related matter, our economic sanctions efforts commonly also cover anti-money laundering ("AML") compliance, under the USA PATRIOT Act and AML rules of other jurisdictions.

The group has, for example, conducted dozens of embargo/sanctions compliance assessments for multinational companies. These compliance assessments have involved reviews of company procedures and transaction documents to identify any deficiencies in compliance practices and to make recommendations for improvements when shortcomings are identified.

If violations or compliance deficiencies are found, we review with the client its potential exposure and other considerations necessary in determining whether or not to file a voluntary self-disclosure, as well as providing a roadmap to ensure that future violations do not occur. These compliance assessments ordinarily result in written reports explaining our findings and recommendations. We always seek to propose compliance procedures that do not disrupt company business objectives or processes; rather, we add a compliance overlay to such objectives and processes to prevent violations.

The group also has a deep history of conducting economic sanctions compliance due diligence in the corporate transactional context and resolving identified issues. We have the experience and expertise to design and implement compliance due diligence plans that are calibrated and appropriate for the circumstances of any given transaction.

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With major penalties for violations and intensified enforcement by the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC") and enforcement agencies in other jurisdictions, Dewey & LeBoeuf has frequently been the firm of choice for financial services institutions, energy companies and others dealing with economic sanctions compliance. The group's efforts on economic sanctions regularly include defense of companies in investigations and enforcement proceedings, internal

The group works closely with regulators at OFAC and other enforcement agencies. We regularly work with the OFAC Chief Counsel's office to resolve precisely how the government will approach compliance issues.

The group's ability to work effectively with regulators is reinforced by experience that many group members have as executive branch officials and congressional staff before going into private practice. The group maintains close contacts with senior OFAC legal and policy personnel.

Representative firm clients on embargo/sanctions matters include:

- AGIP
- Altadis
- Arab Bank
- Aviva
- Axis Insurance
- BHP Billiton
- Butterfield Group
- Catlin
- Chevron
- CNR International
- Cubatabaco
- Diageo
- ENI
- Eskom
- General Electric
- Intel
- Inter-Hannover Insurance
- International Underwriting Association
- Lloyd's
- Millipore Corporation
- Momentive Performance Materials
- Munich Re
- National Oilwell-Varco
- OAM Capital
- P&I/TT Clubs
- Partner Reinsurance Company Ltd.
- ProMutual Group
- SABIC
- Smiths Group
- StatOil
- Telefonica
- Torus Insurance Co.
- Vnesheconombank (VEB)
- Vneshtorgbank (VTB)
- W.R. Berkley
- XL Global Services
- Zurich Insurance

Key Contacts



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Education

University of Virginia School of Law, 1989, J.D.
University of North Carolina, 1985, B.A.

Bar Admissions

Virginia
District of Columbia

Harry L. Clark

Partner

Harry Clark is co-head of Dewey & LeBoeuf’s International Trade Practice Group. Mr. Clark counsels major companies and industry associations on a variety of trade and investment rules. He has deep experience in areas such as CFIUS/Exon-Florio examinations of foreign investment, military and “dual use” export control regulations, economic sanctions administered by the U.S. Treasury Department, the Foreign Corrupt Practices Act, antimoney laundering rules, antiboycott requirements, defense industrial security requirements and government contracting regulations.

Mr. Clark executes internal corporate investigations regarding trade and investment rules and advises on such rules in the context of corporate transactions.

Mr. Clark also represents broad industry coalitions on major trade litigations and international negotiations. His experience in these areas includes a leading role in what is often considered the largest-ever international trade dispute: the controversy regarding unfair softwood lumber imports from Canada. It has involved myriad administrative proceedings before federal agencies, NAFTA panel appeals, WTO dispute proceedings, judicial proceedings and international settlement agreements. He has also represented a coalition of the major US oil companies in antidumping and countervailing duty litigation. As a related matter, he pursues policy issues with congressional and executive branch officials and advises on international trade rules (e.g., GATT, WTO agreements and NAFTA).

Chambers Global recognizes Mr. Clark as a leader in the field of international trade law, with special distinction regarding the Foreign Corrupt Practices Act.

Publications

- Co-Author, "Limits on International Business in the Petroleum Sector: CFIUS Investment Screening, Economic Sanctions, Anti-Bribery Rules, and Other Measures," *6 Tex. J. Oil Gas & Energy L.* 75 (2011).
- Co-author, "An Informed Approach," *Asian Counsel* Vol.8 Issue 3 (April 2010).
- Co-author, "Buyer Beware! US laws hinder foreign investors," *Jane's Defense Weekly* (May 28, 2008).
- Co-author, "New Approaches to National Security Screening of Foreign Investments in the United States and China Could Subject Deals to Closer Scrutiny," *China Business Review* (January/February 2008).
- Co-author, "Movement Towards a US Countervailing Duty Remedy for Chinese Goods That Are Found to be Subsidized," *Int'l Trade Law Rev.* (2007).
- Author, "Tightening the Screws on Foreign Investment," *Forbes.com* (Oct. 23, 2007).
- Co-author, "Foreign Sanctions Countermeasures and Other Responses to US Extraterritorial Sanctions" (August 8, 2007).
- Co-author, "Intensified International Trade and Security Policies Can Present Challenges for Corporate Transactions," *38 Cornell Int'l Law Jnl.* 392 (2005).
- Co-author, "International Mergers and Acquisitions: Liability under US Economic Sanctions," *International Law News* (Fall 2000).
- Author, "US Limits on International Business in the Petroleum Sector: Oil Antidumping Suits, Trade Sanctions and Other Measures," *Fifty-First Annual Institute of Oil and Gas Law and Taxation*, Southwest Legal Foundation, ed., *Publ. No. 640* (2000).
- Author, "Dealing with US Extraterritorial Sanctions and Foreign Countermeasures," *20 U.Penn. J. Int'l Econ. L.* 61 (1999).
- Co-author, "The Iraq/Kuwait Economic Sanctions: Trade Relations on a War Footing," *25 Int'l Law.* 391 (1991).
- Author, "The Free Movement of Goods and Regulation for Public Health and Consumer Protection in the EEC: The West German 'Beer Purity' Case," *28 Va. Jnl. Int'l L.* 753 (1988).

Key Contacts (cont'd)



Washington, DC

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Education

New York University School of Law, 1974, J.D.
Harvard University, 1971, M.A.
Brandeis University, 1969, A.B., *magna cum laude*
Hebrew College, 1968, B.J.Ed.

Bar Admissions

New York
District of Columbia

Court Admissions

U.S. Supreme Court
U.S. Court of Appeals, Federal Circuit
U.S. Court of International Trade
U.S. District Court, Southern District of New York
U.S. Court of Federal Claims

Languages

French
Hebrew

Melvin S. Schwechter

Partner

Melvin Schwechter represents clients before the U.S. Department of Commerce, the U.S. Department of State, the Office of Foreign Assets Control, U.S. Customs and Border Protection, the U.S. International Trade Commission, and the U.S. Trade Representative on all types of import and export-related matters, including audits, investigations, penalty proceedings, prior and voluntary disclosures of violations, export licensing of military and “dual use” products and technology, Technical Assistance and Manufacturing License Agreements, trade sanctions and embargoes, rulings and Commodity Jurisdiction determinations, the classification and valuation of merchandise, marking and country of origin issues, NAFTA and other free trade agreements, foreign trade zones, drawback and other duty savings mechanisms, unfair trade practice proceedings, and related administrative actions. He also appears before the U.S. Court of International Trade and the U.S. Court of Appeals for the Federal Circuit, in judicial appeals of administrative determinations concerning such matters. Mr. Schwechter frequently conducts import/export self assessments for clients, helps them establish compliance and record-keeping programs, and provides import/export training.

Mr. Schwechter previously served as the U.S. Department of Commerce staff attorney responsible for that Department’s export control program.

Representative Matters

- Represented clients in numerous customs, export control, and trade sanction audits, investigations, penalty proceedings, and prior and voluntary disclosures;
- Performed over 125 import/export self-assessments for clients in a wide variety of industries;
- Represented Alcoa in litigation challenging the constitutionality of Harbor Maintenance Taxes as applied to exports; named co-chair of Plaintiffs’ Steering Committee overseeing more than \$1 billion in refunds of such taxes to several thousand companies;

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- Successfully petitioned the Foreign Trade Zones Board to allow the creation of a special purpose subzone allowing the client to realize millions of dollars in duty savings; and
 - Represented clients in more than 40 antidumping, countervailing duty, and other international trade proceedings involving a wide variety of products, and succeeded in an action, on behalf of an exporter of Russian titanium sponge, in revoking an antidumping duty order that had been in effect for 30 years.

Publications

- Co-author, "Buyer Beware! US laws hinder foreign investors," *Jane's Defense Weekly* (May 28, 2008).
- Co-author, "Clean up-the act," *Global Reinsurance* (April 2006).
- Author, "U.S. Customs Reinforces Compliance Standards," *The National Law Journal* (December 4, 1995).
- Co-author, "Harbor Fights May Put Cash into Exporters' Pockets," *Pittsburgh Business Times* (January 16, 1995).
- Columnist, "Business Law Brief," *London Financial Times* (1984-1989).
- Co-author, "The Effects of United States Antitrust Laws on the International Operations of American Firms," *Northwestern Journal of International Law and Business* 492 (1979).

Other Activities

- Trustee and Vice President, The Historical Society of the U.S. Court of International Trade
- Immediate Past President, Customs and International Trade Bar Association
- Co-chair, Export Compliance and Facilitation Committee, American Association of Exporters and Importers
- Eligible panelist, North America Free Trade Agreement, Chapter 19 Dispute Resolution
- Adjunct professor, International Trade and Customs Law, Benjamin N. Cardozo School of Law, 1983-1999

Key Contacts (cont'd)



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Education

Harvard Law School, 1972, J.D.
Harvard Business School, 1972, M.B.A.
Williams College, 1968, B.A.

Bar Admissions

Massachusetts
District of Columbia

Court Admissions

U.S. District Court, District of Columbia

W. Clark McFadden II

Partner

W. Clark McFadden II represents corporate clients in international trade, encompassing work in litigation, regulation and legislation. He also practices in international corporate transactions, especially the formation of joint ventures and consortia, and international investigations and enforcement proceedings.

Mr. McFadden has a broad background in foreign affairs and international trade, having experience with Congressional committees, the U.S. Department of Defense and the National Security Council.

In 1986, he was appointed General Counsel, President's Special Review Board ("Tower Commission"), to investigate the National Security Council system and the Iran-Contra Affair.

In 1979, Mr. McFadden served as Special Counsel to the Senate Foreign Relations Committee on the Strategic Arms Limitations Treaty (SALT II). Previously, from 1973-1976, he was General Counsel, Senate Armed Services Committee, and was responsible to the Committee for all legislative, investigatory and oversight activities.

Mr. McFadden is the secretary to the Board of Directors of the Semiconductor Industry Association, the Optoelectronics Industry Development Association and the Semiconductor Research Corporation. He is also a member of the Steering Committee for Government-Industry Partnerships for the Development of New Technologies of the National Research Council of the National Academy of Sciences.

Bar Associations, Memberships and Activities

- American Bar Association
- District of Columbia Bar Association
- Massachusetts Bar Association
- Military: U.S. Navy (R)



Peter Crowther

Partner

Peter Crowther coordinates the Competition/EU practice, working out of our London and Brussels offices. Peter has significant experience of EU merger control, national and international cartels, state aid, trade/sanctions, free movement and other general EU and competition law. Peter also has a long track record of advising broadcasting and telecommunications companies on regulatory matters.

A significant part of Peter's practice involves defending companies in a wide range of national and international enforcement proceedings, often simultaneously across a range of jurisdictions. Peter also devises and implements compliance programmes covering areas such as competition, trade/sanctions, bribery and corruption.

Peter is a former law lecturer and former holder of a Jean Monnet Professorship in European Law. He has been recognised in *Chambers 2006-2009* and has been named one of *The Lawyer's* "Hot 100" for 2011.

London

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Education

Copenhagen Business School, 1997, Ph.D.
(EU Competition Law in Telecommunications)
University of Oxford, 1993, Masters (Law and Economics)
Keele University, 1992, BA (Jt Hons)

Bar Admissions

Brussels, Belgium (EU list)
Court Admissions
Solicitor, Supreme Court of England and Wales

Languages

French
Danish
German
English

Recent merger work (most requiring EC Merger Regulation clearance) includes advising:

- AIG on the sale of a banking business to Santander;
- CEDC, the leading Vodka producer in Russia and Central and Eastern Europe, on its acquisition of Russian Alcohol Group;
- Citigroup Venture Capital International on a number of acquisitions requiring EC Merger Regulation and non-EU clearances;
- CME, the leading Central and Eastern European broadcaster, on its acquisition of the leading Bulgarian free-to-air broadcaster;
- CNPC, the Chinese State oil company, in relation to a variety of acquisitions;
- Finmeccanica, the Italian State defence company, on special public interest aspects under the Enterprise Act 2002 in respect of its acquisition of a UK target;
- Munich Re on its acquisition of Hartford Steam Boiler Company;
- Lyondell Basell on its acquisition of a major refinery from Shell;
- Metlife on its acquisition of Alico, the worldwide life insurance business of AIG;
- RWE on a proposed acquisition requiring EC Merger Regulation clearance;
- Vedanta Resources, a major metals and mining company on its acquisition of zinc assets of Anglo American;
- A variety of Hedge Funds on merger arbitrage.

Key Contacts (cont'd)

Other recent work includes advising:

- Global manufacturing companies in a number of industrial sectors on alleged cartels under simultaneous investigation by regulators in a range of jurisdictions;
- A global oil and gas company on simultaneous civil and criminal investigations into alleged corruption activities;
- A leading European oil company on a successful challenge to national legislation for being contrary to EU rules on free movement and discriminatory taxation;
- A major mining business on a global joint venture with a major competitor;
- A major integrated oil and gas company on international competition proceedings.

Publications

Peter is widely published, including for many years authoring a chapter of the looseleaf publication Butterworths *Competition Law* (eds Freeman and Whish). Peter's articles have appeared in many journals including the *European Competition Law Review*. He has written over 20 publications on the application of competition law in the telecommunications and broadcasting sectors.



Christopher J. Clark

Partner

Christopher Clark is a partner in the Litigation Department and head of the firm's White Collar Criminal Defense and Regulatory Investigations Practice Group. Mr. Clark represents public companies, alternative investment entities such as hedge funds, and individuals in both criminal and civil investigations involving state and federal law enforcement authorities. Mr. Clark's practice focuses on securities law and foreign and domestic anti-corruption law, and has involved representations such as defending Mark Cuban in an SEC enforcement action; defending The Reserve Primary Fund in an SEC enforcement action; representing a key subject of the New York Attorney General's Pay-to Play investigation; and representing Royal Dutch Shell in an FCPA investigation brought by the United States Department of Justice and the SEC. Mr. Clark has represented hedge fund clients in precedent setting and first-of-their-kind matters involving Section 5 of the Securities Act, Rule 105 of Regulation M, and the rules regarding insider trading.

Prior to joining Dewey & LeBoeuf in 2005, Mr. Clark was an Assistant U.S. Attorney in the U.S. Attorney's Office in the Southern District of New York for six years, where he was a member of the Securities and Commodities Fraud Task Force. During his tenure at the U.S. Attorney's Office, he conducted nine federal criminal trials as lead or co-lead counsel, including, most recently, *United States v. John J. Rigas, et al.* in which both the former CEO and former CFO of Adelphia Communications Corporation were convicted of numerous securities and bank fraud charges. Mr. Clark's other trials include the successful securities fraud prosecution of the former CEO of a public healthcare corporation (*United States v. Arthur Wheeler*), and the successful prosecution of two Certified Public Accountants for agreeing to provide fraudulent audit opinions (*United States v. Downing (Ward and Drucker)*). He has also delivered over 20 oral arguments before the United States Court of Appeals for the Second Circuit. Mr. Clark clerked for the Honorable Joseph M. McLaughlin, U.S. Court of Appeals for the Second Circuit and the Honorable Lewis A. Kaplan, United States District Court, Southern District of New York, after graduating from law school.

New York

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Education

Columbia University Law School, 1996, J.D.,
Senior Editor, Columbia Law Review
University of California, Berkeley, 1993, B.A.,
Phi Beta Kappa

Bar Admissions

New York

Court Admissions

U.S. District Court, Southern District of New York

Key Contacts (cont'd)

Representative Matters

- Represented Royal Dutch Shell plc and certain of its subsidiaries in the defense and resolution of a United States Department of Justice/Securities and Exchange Commission Foreign Corrupt Practices investigation;
- *S.E.C. v. Mark Cuban.*, represented Mark Cuban in connection with allegation that Mr. Cuban committed insider trading. Obtained first of its kind decision dismissing S.E.C.'s Complaint in its entirety;
- *S.E.C. v. Gryphon Partners, L.P.*, representation of hedge fund in contested enforcement proceeding regarding the trading of PIPEs. Won landmark motion to dismiss SEC allegations regarding violations of Section 5 of the Securities Act of 1933;
- Represented prominent hedge fund in one of the first SEC matters pursued under Regulation M Rule 105;
- Represented a major appraisal management in New York Attorney General's Office investigation of the appraisal management industry. No action was taken against client appraisal management company.
- Represented Fortune 500 insurance company after receipt of target letter from the United States Department of Justice. Successfully negotiated for no action to be taken against target company.
- Representation of major information services provider in connection with DOJ FCPA investigation. No action taken by DOJ against client company.
- *Health Care Regulatory Investigations*, Assisted Federal Monitor in addressing multiple regulatory inquiries relating to activities of major American pharmaceutical company;
- *Certain Loss Mitigation Products (2005)*, Lead counsel in investigation of numerous transactions in the worldwide reinsurance industry;
- *United States v. John J. Rigas, et al. (2002-2005)*. Co-lead counsel in investigation and trial of one of the largest securities frauds in history, with losses in the tens of billions of dollars. Involvement concerned all three main aspects of the Adelphia case: (1) criminal investigation and trial; (2) bankruptcy matters; and (3) civil settlement;
- In the criminal investigation, oversaw the conduct of scores of witness interviews and constructed investigative plan that led to charges in one of the shortest periods ever for a case of this magnitude. Co-lead counsel at 16-week criminal trial. Presented the majority of the Government's trial witnesses, including Government's main cooperating witness, who was on the stand for the entire month of May 2004. Presented Government's summation to the jury;

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- In bankruptcy court, handled numerous matters on behalf of the Government, including discovery stay litigation and Section 9019 motion seeking approval of a settlement of potential charges against Adelphia;
 - Helped manage and negotiate landmark tri-party civil settlement with Adelphia and Rigas Family. Settlement resulted in \$750 million for victims of Adelphia fraud. Settlement structure involved the compromise of several civil suits and class actions, and required the approval of numerous parties with disparate interests. Successfully defended settlements against two emergency mandamus petitions before the Second Circuit. See *In re Huff Asset Management*, 409 F.3d 555 (2d Cir. 2005);
 - *United States v. Arthur Wheeler (2002)*. Lead counsel in prosecution of CEO of American Healthcare Providers, Inc. for distribution of false press releases in connection with a scheme to manipulate the public market for the company's stock. Two-week trial resulted in the conviction of the CEO. Also obtained guilty pleas from CEO's three accomplices in the scheme;
 - *United States v. Peter Chabot (2000)*. Co-lead counsel in investigation and prosecution of hedge fund manager who, due to losses and misappropriation, lost all of the fund's principal and attempted to flee to Brazil. Successfully tracked defendant and apprehended him during flight. Identified assets available for forfeiture and oversaw civil process to perfect that forfeiture;
 - *United States v. Glenn B. Laken, et al. (2000)*. Lead counsel in prosecution of six individuals in connection with a plan to manipulate the market for a public security through false information and rigged trades; and
 - *United States v. Samuel Ward, et ano. (2000)*. Lead counsel in prosecution and trial of two CPAs for securities fraud in connection with their agreement to provide sham certified audits to public companies. Jury trial resulted in the conviction of the defendant-CPAs, their imprisonment and the loss of their licenses.

Selected Activities

- Faculty Member and Panelist, PLI Securities Litigation and Enforcement Institute, San Francisco, CA, September 2006
- Speaker, United States Postal Inspection Service, Advanced Fraud Training, Washington, D.C., April 6, 2005 and San Francisco, CA, July 27, 2005
- Speaker, Corporate Fraud Working Group, Recent Developments in Asset Forfeiture, Denver, CO, February 3, 2005
- Speaker, Department of Justice — Financial Fraud Conference, Financial Fraud Investigative Tools, New York, NY, August 21, 2004

Key Contacts (cont'd)

Publications

- Author (with Brian K. Lamb), "Hedge Fund Lending Practices May Draw Increased Government Scrutiny Into Insider Trading Compliance," *Financial Fraud Law Report* (November 2010).
- Author, "SEC Adopts New Rule Imposing Limited Price Registration on Short Selling," *Derivatives Financial Products Report* (October 2010).
- Author, "The Complexities to International White Collar Enforcement," *International White Collar Enforcement* (2010).
- Author (with Ralph C. Ferrara), "A New Era for Corporate Fines," *The Corporate Board* (May/June 2006).
- Author (with Ralph C. Ferrara), "Content and Analysis," *BNA World Securities Law Report* (January 2006).
- Author, "The Recognition of a Qualified Privilege for Non-Confidential Journalistic Materials: Good Intentions, Bad Law," 65 *Brook. L. Rev.* 369 (1999).

Selected Media Coverage

- "Mark Cuban Scores in SEC Case," *Wall Street Journal* (July 18, 2009) (quoting Clark regarding Judge's opinion).
- "Big Suits SEC v. Adelphia," *American Lawyer* (July 2005).
- "Adelphia Founder Sentenced to 15 Years, Son Given 20," *New York Law Journal*, Tuesday (June 21, 2005).
- "Adelphia Creditors Seek Settlement Reversal," *The Wall Street Journal* (June 7, 2005).
- "How Marathon Talks Split Adelphia Assets," *The Legal Intelligencer* (June 17, 2005).
- "Adelphia Trial Nears Finish Line," *The Wall Street Journal* (June 23, 2004).
- "Greed Destroyed Adelphia, Prosecutor Says in Summary," *The New York Times* (June 17, 2004).
- "Prosecution Wraps Up Adelphia Trial," *The Wall Street Journal* (June 17, 2004).
- "Rigas Downplayed Pay, Witness Says," *The Wall Street Journal* (May 11, 2004).
- "A White-Collar Criminal Adds Conviction No. 7 to His Record," *The New York Times* (March 13, 2002) Market Place (Floyd Norris).

Dewey & LeBoeuf LLP

New York | London | Washington, DC | Abu Dhabi | Albany | Almaty | Beijing | Boston | Brussels | Chicago | Doha | Dubai | Frankfurt
Hong Kong | Houston | Johannesburg | Los Angeles | Madrid | Milan | Moscow | Paris | Riyadh | Rome | San Francisco | Silicon Valley | Warsaw

dl.com

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