

February 2025

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SEC Reporting Obligations Under Section 13 and Section 16 of the Exchange Act

2025 FILING SCHEDULE

<i>TYPE OF SECTION 13 FILING</i>	<i>TRIGGERING EVENTS</i>	<i>FREQUENCY OF FILING</i>	<i>FILING DEADLINE (a "Business Day" is any day other than a weekend or U.S. federal holiday; if deadline falls on a weekend or U.S. federal holiday, the deadline is extended to the next Business Day)</i>
Initial Schedule 13D	When a reporting person is not qualified to file a Schedule 13G and exceeds the 5% threshold	One-time	Within five Business Days after 5% threshold exceeded
Initial Schedule 13G	1. When a Qualified Institution or Exempt Investor exceeds the 5% threshold (subject to item 2 below)	One-time	Within 45 days after the end of the calendar quarter which the 5% threshold exceeded
	2. When beneficial ownership of a Qualified Institution with no previous Section 13 filing exceeds 10% at any month end	One-time	Within five Business Days after the end of the month in which the 10% threshold is exceeded
	3. When a Passive Investor exceeds the 5% threshold	One-time	Within five Business Days after the 5% threshold is exceeded
Switch from Schedule 13G to Schedule 13D	When a reporting person acquires or holds Section 13(d) Securities with an "activist intent"	One-time	Within five Business Days of having the "activist intent"
	When a Passive Investor's beneficial ownership equals or exceeds 20%	One-time	Within five Business Days of acquiring 20% beneficial ownership

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Amendments to Schedule 13D	Any material change in information reported on previous Schedule 13D	Ongoing	Within two Business Days after the material change
Amendments to Schedule 13G	<p><i>All Reporting Persons:</i></p> <p>Any material change in information reported on Schedule 13G</p>	Quarterly	Within 45 days after the end of each calendar quarter (i.e., February 14, 2025, May 15, 2025, August 14, 2025, and November 14, 2025)
	<p><i>Qualified Institutions:</i></p> <p>1. When beneficial ownership of a Qualified Institution exceeds 10% at end of a month</p> <p>2. Thereafter, when beneficial ownership of a Qualified Institution increases or decreases by 5% or more from the last Schedule 13G filing, computed as of the last day of the month</p>	Ongoing	Within five Business Days after the end of the month in which the 10% threshold is exceeded
	<p><i>Passive Investors:</i></p> <p>1. When beneficial ownership of a Passive Investor exceeds 10%</p> <p>2. Thereafter, when beneficial ownership of a Passive Investor increases or decreases by 5% or more from the last Schedule 13G filing</p>	Ongoing	Within two Business Days after the 10% threshold is exceeded
Initial Form 13F	When a reporting person has discretion over accounts with \$100 million or more of Section 13(f) Securities on the last trading day of any month during the calendar year	One-time	February 14, 2025

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Quarterly Form 13F	After initial Form 13F, filings must continue for at least the next three calendar quarters	Quarterly	May 15, 2025 August 14, 2025 November 14, 2025
Amendment to Form 13F	Any omitted holdings or errors in information reported on previous Form 13F	As needed	Not specified but we recommend promptly
Form SHO	When accounts under discretionary management have (a) a monthly average gross short position in the equity securities of any public or reporting company equal to \$10 million in value or 2.5% of the company's outstanding shares, or (b) a gross short position in the equity securities of other company of \$500,000 at the closing of regular trading hours on any settlement date (each, an "identifying short position")	Monthly	Within 14 days of the end of any calendar month in which the manager has an "identifying short position" (<i>initial filing deadline delayed until February 17, 2026</i>)
Initial Form 13H	When accounts under discretionary management transact in NMS securities in an amount equal to or more than (a) two million shares or \$20 million during any calendar day, or (b) 20 million shares or \$200 million during any calendar month ("identifying activity level")	One-time	Promptly after effecting aggregate transactions at the "identifying activity level"
Subsequent Form 13H	After the initial Form 13H	Annually	Within 45 days after the end of each full calendar year until the filing of an "inactive status" Form 13H after a full calendar year of effecting transactions below the "identifying activity level"
	Any information on the previous Form 13H becomes inaccurate	Quarterly	Promptly following the end of the calendar quarter in which the information becomes inaccurate

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Initial Form N-PX	When a reporting person exercises voting power over any public company's securities with respect to any say-on-pay voting matters	One-time	August 31 after its initial Form 13F filing (<i>July 1 to June 30 reporting period</i>)
Subsequent Form N-PX	After the initial Form N-PX	Annual	August 31 of each calendar year (<i>July 1 to June 30 reporting period</i>)
	When a reporting person ceases to be a Form 13F reporting person	One-time	March 1 after its last Form 13F filing (<i>July 1 to September 30 reporting period</i>)
Form 3	When a reporting person becomes an officer or director of a public company or meets the 10% threshold	One-time	Within 10 days of the "triggering" event (or at the time of the registration of such security on a national securities exchange or by the effective date of a registration statement)
Form 4	Any transaction or change in beneficial ownership (e.g., exercise of any option, warrant or right or conversion of a security)	Ongoing	Within two Business Days of the trade date
Form 5	Any transaction not reported on Form 4 during the calendar year (<i>not required if all transactions previously reported on Form 4</i>)	Annual	Within 45 days after the end of each full calendar year

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If you have any questions concerning these developing issues, please do not hesitate to contact any of the following Paul Hastings lawyers:

Los Angeles

Arthur L. Zwickel
+1-213-683-6161
artzwickel@paulhastings.com

Yousuf Dhamee
+1-213-683-6179
yousufdhamee@paulhastings.com

Alicia Harrison
+1-213-683-6248
aliciaharrison@paulhastings.com

San Francisco

David A. Hearth
+1-415-856-7007
davidhearth@paulhastings.com

New York

Michael R. Rosella
+1-212-318-6800
mikerosella@paulhastings.com

Keith Pisani
+1-212-318-6053
keithpisani@paulhastings.com

Ryan Swan
+1-212-318-6080
seandonahue@paulhastings.com

Sean Donahue
+1-212-318-6764
ryanswan@paulhastings.com

London

Christian Parker
+44-020-3023-5161
christianparker@paulhastings.com

Duncan Woollard
+44-020-3023-5434
duncanwoollard@paulhastings.com

Diala Minott
+44-020-3023-5481
dialaminott@paulhastings.com