

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Internal Revenue Code Section 316 defines a "dividend" generally as any distribution of property made by a corporation to its shareholders out of earnings and profits (as defined by Internal Revenue Code Section 312 and the Regulations thereunder). Pursuant to Internal Revenue Code Section 301(c)(2), the portion of the distribution which is not a dividend shall be applied against and reduce the adjusted tax basis of the stock under Internal Revenue Code Section 301(c)(3). A distribution which is not a dividend, to the extent that it exceeds the shareholder's adjusted tax basis of the stock, shall be treated as gain from the sale or exchange of property.

18 Can any resulting loss be recognized? ▶ The organization action reported herein does not result in any losses.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The amount of the nontaxable distributions on the date mentioned above either (i) reduces the shareholder's adjusted tax basis in their stock or (ii) to the extent that it exceeds the shareholder's adjusted tax basis in their stock on the date of the distribution, is treated as gain from the sale or exchange of property in 2014.

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 ▶ /s/ MICHAEL STAUFFER (original signature is on file) Date ▶ MAR. 13, 2015

Print your name ▶ Michael Stauffer Title ▶ V.P. of Taxes of successor to Issuer

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	<u>Dominic Kracht</u>	<u>/s/ DOMINIC KRACHT</u> (original signature is on file)	<u>3/13/2015</u>		<u>P01297858</u>
	Firm's name ▶ <u>Deloitte Tax LLP</u>	Firm's EIN ▶ <u>86-1065772</u>		Phone no. <u>213-688-6587</u>	
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