

Part II Organizational Action *(continued)*

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ [See attached.](#)

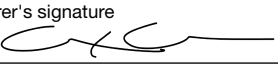
18 Can any resulting loss be recognized? ▶ [See attached.](#)

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [See attached.](#)

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 ▶ William Van Saders Date ▶ Nov 12, 2020

Print your name ▶ William Van Saders Title ▶ SVP & Deputy General Counsel - Taxes

Paid Preparer Use Only	Print/Type preparer's name <u>Alexander Cadmus</u>	Preparer's signature 	Date <u>11/04/2020</u>	Check <input type="checkbox"/> if self-employed	PTIN <u>P02188948</u>
	Firm's name ▶ <u>Cleary Gottlieb Steen & Hamilton LLP</u>	Firm's EIN ▶ <u>13-5599083</u>			
	Firm's address ▶ <u>One Liberty Plaza, New York, NY 10006</u>	Phone no. <u>(212) 225-2000</u>			