

MEMORANDUM

TO: File No. 4-617

FROM: John W. Avery
Assistant General Counsel
Office of the General Counsel

DATE: July 12, 2011

RE: Meeting with Representatives of European Pension Funds

On the above date, John Avery, Eric Pan, William Shirey, and other staff involved in the Study on Extraterritorial Private Rights of Action met with representatives of European pension funds to discuss the funds' perspective on the study. Attendees from the funds were:

Femke van 't Groenewout, Senior Advisor Responsible Investment - PGGM (Netherlands)

Richard Grottheim, Chief Executive Officer - AP7 (Sweden)

Anders Mansson, Legal Counsel, AP7 (Sweedden)

Phil Spathis, Manager of Strategy & Engagement - Australian Council of Super Investors

Jeremy Hill, General Counsel - Universities Superannuation Scheme (UK)

Daniel Summerfield, Head of Corporate Governance - Universities Superannuation Scheme (UK)

Jeff Davis - Senior Legal Counsel - Ontario Teachers' Pension Plan (Canada)

Leo Palmen, General Counsel - APG (Netherlands)

Michael Hensman, Financial Controller - Coal Pension Trustees Limited (UK)