M E M O R A N D U M

То	:	File No. S7-19-18
Date	:	October 21, 2019
From	:	N. Sean Harrison Division of Corporation Finance
Re	:	Conference Call with Shearman and Sterling LLP

On October 21, 2019, staff of the Division of Corporation Finance participated in a conference call with representatives of Shearman and Sterling to discuss certain issues raised in its comment letter concerning Release No. 33-10526 (File No. S7-19-18). The following Commission staff participated: Jarrett Torno, Craig Olinger and Sean Harrison. The following representatives of Shearman and Sterling participated: Harald Halbhuber and Lona Nallengara.