

MEMORANDUM

TO: File No. S7-23-19

FROM: Claire O’Sullivan and Armita Cohen
Counsels to Commissioner Caroline Crenshaw

RE: Meeting with Professor Gillian E. Metzger, Columbia Law School

On September 11, 2020, Claire O’Sullivan and Armita Cohen spoke with Gillian Metzger of Columbia Law School. Among the topics discussed were the Commission’s proposed amendments to rules under the Securities Exchange Act of 1934 relating to shareholder proposals, File No. S7-23-19.