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December 21, 2020

Ms. Vanessa Countryman  
Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-0609

RE: File Number SR-NASDAQ-2020-081

Dear Ms. Countryman,

On behalf of Loring, Wolcott & Coolidge, a 200-year-old investment management firm with over \$9 billion in assets under management, we write to express support of Nasdaq's recent proposal to adopt listing rules related to board diversity (file SR-NASDAQ-2020-081). We believe that the proposed rule is a long overdue first step towards addressing systemic racial injustices that have plagued our country for generations – injustices that are now deeply embedded in Corporate America. We believe that diversity leads to better governance and that enhanced transparency is central to the fair and orderly function of the securities market. Finally, we believe that the proposed rule change is merely a reflection of mainstream thinking in America on the topic of diversity. For these reasons, we strongly encourage the SEC to adopt these listing rules.

Based on the following quote from the SEC's "Diversity and Inclusion at the SEC" landing page, we are hopeful that the Commission will support Nasdaq's efforts:

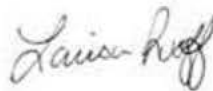
*Leveraging diversity and inclusion throughout the agency helps ensure the Commission's regulatory programs and guidance reflect the diversity of the investors and businesses who depend on our work. Put simply, in order to perform at the highest level, we need to ensure that our work and our workforce reflect a diversity of thoughts, backgrounds, and experiences.*

-CHAIRMAN JAY CLAYTON

Sincerely,



**W. Andrew Mims**  
Trustee and Partner



**Larisa Ruoff**  
Director of Shareholder Advocacy