

2019-2020 Shareholder Proposal No-Action Responses

The staff of the Division of Corporation Finance states only informal, non-binding views as to whether the Division would recommend enforcement action to the Commission if a company excludes a proposal from its proxy materials. The staff does not and cannot adjudicate the merits of a company's position with respect to a proposal. Only a court can determine whether a company may legally exclude the shareholder proposal from its proxy materials.

When a company's request asserts multiple regulatory bases for exclusion of a proposal and the staff concurs with the company's view that there is a basis to exclude the proposal, the staff concurs with exclusion on only one of the bases asserted by the company and does not address the alternative bases the company asserts. When the staff is unable to concur with the company's view that there is a basis to exclude the proposal, the staff is unable to concur with exclusion on any of the regulatory bases the company asserts.

The staff's responses to Rule 14a-8 no-action requests issued on or after November 21, 2019 are disclosed in the following chart. The column titled "Date of company's initial submission" contains a hyperlink to the company's initial submission to the staff, and the column titled "Date of staff's response" contains a hyperlink to the correspondence relating to the staff's response, including any letter issued by the staff, the company's initial submission and any subsequent correspondence, in reverse chronological order. In each case, the hyperlink will be available when the materials are posted on the SEC website, generally within a few business days of the staff's response.

The text of Exchange Act Rule 14a-8 is available [here](#).

Company that submitted the reasons for excluding the proposal.	Shareholder that submitted the proposal to the company.	Date of company's initial submission.	Regulatory bases asserted by company to exclude the proposal.	Staff's response to the company's request.	Date of staff's response.	Did the staff respond by letter?
Extreme Networks, Inc.	Kenneth Steiner	8/21/2020	Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	9/18/2020	No
ResMed Inc.	Myra K. Young	7/17/2020	Rule 14a-8(i)(5)	Concur that Rule 14a-8(i)(5) provides a basis to exclude	8/27/2020	No
Cisco Systems, Inc.	James McRitchie	7/28/2020	Rule 14a-8(i)(2) Rule 14a-8(i)(6) Rule 14a-8(i)(10)	Withdrawn	8/27/2020	No
NextDecade Corporation	Stewart Taggart	7/16/2020	Rule 14a-8(b)/(f)	Withdrawn	8/27/2020	No

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Smith & Wesson Brands, Inc.	Catholic Health Initiatives and Sisters of the Holy Names of Jesus and Mary	6/15/2020	Rule 14a-8(i)(3) Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Unable to concur with exclusion on any of the bases asserted	8/14/2020	No
Cardinal Health, Inc.	International Brotherhood of Teamsters General Fund	7/7/2020	Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Withdrawn	8/14/2020	No
The Clorox Company	James McRitchie	6/25/2020	Rule 14a-8(i)(10)	Withdrawn	8/14/2020	No
NIKE, Inc.	National Center for Public Policy Research	5/1/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (ordinary business)	6/19/2020	No
NIKE, Inc.	Cirque LLC	5/1/2020	Rule 14a-8(i)(4) Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (ordinary business)	6/19/2020	No
FedEx Corporation	The Dawn E. Peterson Trust	5/19/2020	Rule 14a-8(i)(11)	Withdrawn	6/19/2020	No
McKesson Corporation	Chang Liu Family Living Trust et al.	3/30/2020	Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Unable to concur with exclusion on any of the bases asserted	5/26/2020	No
PG&E Corporation	John Chevedden	4/22/2020	Rule 14a-8(b)/(f)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	5/26/2020	No
Broadway Financial Corporation	Commerce Home Mortgage, LLC	4/30/2020	Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	5/12/2020	No
<i>salesforce.com, inc.</i>	<i>National Center for Public Policy Research</i>	2/5/2020	<i>(reconsid.)</i> Rule 14a-8(i)(7)	<i>Request for reconsideration and Commission review denied</i>	4/22/2020	No
<i>Alphabet Inc.</i>	<i>National Center for Public Policy Research</i>	2/4/2020	<i>(reconsid.)</i> Rule 14a-8(i)(7)	<i>Request for reconsideration and Commission review denied</i>	4/22/2020	No
PetMed Express, Inc.	James McRitchie	3/26/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	4/14/2020	No

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Booz Allen Hamilton Holding Corporation	John Chevedden	3/10/2020	Rule 14a-8(i)(9) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	4/14/2020	No
Cowen Inc.	Kenneth Steiner	3/9/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	4/14/2020	No
Rite Aid Corporation	Steven Krol	3/5/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	4/14/2020	No
ServiceNow, Inc.	James McRitchie and Myra K. Young	2/4/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	4/9/2020	No
Linde plc	John Chevedden	2/7/2020	Rule 14a-8(i)(1) Rule 14a-8(i)(2) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	4/9/2020	No
Comcast Corporation	George C. Jenne	1/31/2020	Rule 14a-8(i)(7)	Unable to concur that Rule 14a-8(i)(7) provide a basis to exclude	4/9/2020	No
MetLife, Inc.	Walter O. Garcia et al.	2/5/2020	Rule 14a-8(i)(10)	Unable to concur that Rule 14a-8(i)(10) provides a basis to exclude	4/9/2020	No
Hess Corporation	Park Foundation, Inc. and Brian Patrick Kariger Revocable Trust	2/4/2020	Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	4/9/2020	No
salesforce.com, inc.	National Center for Public Policy Research	2/5/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude	4/9/2020	No
Alphabet Inc.	National Center for Public Policy Research	2/4/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude	4/9/2020	No
Amazon.com, Inc.	<i>International Brotherhood of Teamsters General Fund and CtW Investment Group</i>	1/24/2020	(reconsid.) Rule 14a-8(i)(7)	<i>Request for Commission review denied</i>	4/9/2020	No

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The TJX Companies, Inc.	Kay Berkson and the Benedictine Sisters of Mount St. Scholastica	2/3/2020	Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Unable to concur with exclusion on any of the bases asserted	4/9/2020	No
The TJX Companies, Inc.	Brianna L. Harrington	2/3/2020	Rule 14a-8(i)(7)	Unable to concur that Rule 14a-8(i)(7) provides a basis to exclude	4/9/2020	Yes
The TJX Companies, Inc.	New York State Common Retirement Fund	2/3/2020	Rule 14a-8(i)(10)	Unable to concur that Rule 14a-8(i)(10) provides a basis to exclude	4/9/2020	No
RH	People for the Ethical Treatment of Animals	3/10/2020	Rule 14a-8(i)(7)	Withdrawn	4/9/2020	No
Upwork Inc.	James McRitchie and Myra K. Young	1/29/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	4/1/2020	No
Devon Energy Corporation	George Gund Foundation and Samajak LP	1/29/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	4/1/2020	No
Walmart Inc.	Cynthia Murray	2/3/2020	Rule 14a-8(i)(7)	Unable to concur that Rule 14a-8(i)(7) provides a basis to exclude	4/1/2020	No
Comcast Corporation	Jing Zhao	1/31/2020	Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	4/1/2020	No
eBay Inc.	Jing Zhao	1/28/2020	Rule 14a-8(i)(2) Rule 14a-8(i)(3) Rule 14a-8(i)(6)	Concur that Rules 14a-8(i)(2) and (i)(6) provide bases to exclude	4/1/2020	No
Amazon.com, Inc.	Oxfam America, Inc et al.	1/24/2020	Rule 14a-8(i)(5) Rule 14a-8(i)(7)	Unable to concur with exclusion on any of the bases asserted	4/1/2020	No
Amazon.com, Inc.	Dan Phung	1/24/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude	4/1/2020	No

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Amazon.com, Inc.	International Brotherhood of Teamsters General Fund and CtW Investment Group	1/24/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude	4/1/2020	Yes
Amazon.com, Inc.	Sisters of St. Joseph of Brentwood et al.	1/24/2020	Rule 14a-8(i)(11)	Unable to concur that Rule 14a-8(i)(11) provides a basis to exclude	4/1/2020	No
Walmart Inc.	International Brotherhood of Teamsters General Fund	2/3/2020	Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	3/27/2020	No
Resideo Technologies, Inc.	John Chevedden	2/3/2020	Rule 14a-8(b)/(f)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	3/27/2020	No
The GEO Group, Inc.	Service Employees International Union Pension Plans Master Trust	1/17/2020	Rule 14a-8(i)(4) Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Unable to concur with exclusion on any of the bases asserted	3/27/2020	No
General Motors Company	Mary Lowe Mayhugh	1/31/2020	Rule 14a-8(b)/(f)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	3/27/2020	No
General Motors Company	James M. Dollinger and John Lauve	1/31/2020	Rule 14a-8(b)/(f)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	3/27/2020	No
IntriCon Corporation	Pro Cap NYC llc	2/10/2020	Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	3/27/2020	No
HealthStream, Inc.	Pro Cap NYC llc	2/10/2020	Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	3/27/2020	No
Addus HomeCare Corporation	Pro Cap NYC llc	2/5/2020	Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	3/27/2020	No

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Chimera Investment Corporation	Pro Cap NYC llc	2/5/2020	Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	3/27/2020	No
Camden National Corporation	Pro Cap NYC llc	2/4/2020	Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	3/27/2020	No
Amazon.com, Inc.	Stephen and Hinda F. Sacks	1/24/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	3/27/2020	No
Amazon.com, Inc.	Öhman Fonder et al.	1/24/2020	Rule14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	3/27/2020	No
Amazon.com, Inc.	Sisters of the Order of St. Dominic of Grand Rapids et al.	1/24/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	3/27/2020	No
Best Buy Co., Inc.	John Chevedden	1/23/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	3/27/2020	No
Marriott International, Inc.	AFL-CIO Reserve Fund	1/17/2020	Rule 14a-8(i)(10)	Unable to concur that Rule 14a-8(i)(10) provides a basis to exclude	3/27/2020	Yes
Cheniere Energy, Inc.	Stewart Taggart	1/21/2020	Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Unable to concur with exclusion on any of the bases asserted	3/20/2020	No
Yum! Brands, Inc.	Lisa Haage and Keith C. Schnip	1/10/2020	Rule 14a-8(i)(10)	Unable to concur that Rule 14a-8(i)(10) provides a basis to exclude	3/20/2020	No
Fitbit, Inc.	Kenneth Steiner	1/17/2020	Rule 14a-8(b)/(f) Rule 14a-8(i)(7)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	3/20/2020	Yes
Teladoc Health, Inc.	Myra K. Young and James McRitchie	1/22/2020	Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	3/20/2020	No
Exxon Mobil Corporation	Steven J. Milloy	1/17/2020	Rule 14a-8(i)(3) Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Unable to concur with exclusion on any of the bases asserted	3/20/2020	No

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Comcast Corporation	Joseph S. and Donna E. Nunziato Revocable Living Trust	1/21/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude	3/20/2020	No
Ormat Technologies, Inc.	Trillium Asset Management LLC	1/21/2020	Rule 14a-8(i)(10)	Unable to concur that Rule 14a-8(i)(10) provides a basis to exclude	3/20/2020	No
The TJX Companies, Inc.	NorthStar Asset Management, Inc. Funded Pension Plan	2/3/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude	3/20/2020	No
The Home Depot, Inc.	NorthStar Asset Management, Inc. Funded Pension Plan	1/17/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude	3/20/2020	No
Discover Financial Services	Myra K. Young	2/10/2020	Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	3/20/2020	No
The Progressive Corporation	Lutra Living Trust and Hazen Foundation	1/21/2020	Rule 14a-8(b)/(f) Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Withdrawn	3/20/2020	No
McDonald's Corporation	IBVM Foundation of Canada Inc.	1/17/2020	Rule 14a-8(i)(7)	Withdrawn	3/20/2020	No
Amazon.com, Inc.	Mercy Investment Services and Dignity Health	1/24/2020	Rule 14a-8(i)(7)	Withdrawn	3/20/2020	No
Chevron Corporation	Park Foundation, Inc. et al.	1/17/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	3/20/2020	No
Exxon Mobil Corporation	Andrew Behar	1/17/2020	Rule 14a-8(i)(3) Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	3/20/2020	No
Amazon.com, Inc.	Jing Zhao	1/24/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	3/13/2020	No

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JPMorgan Chase & Co.	Thomas Strobhar	1/13/2020	Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Unable to concur with exclusion on any of the bases asserted	3/13/2020	No
Marriott International, Inc.	People for the Ethical Treatment of Animals	1/17/2020	Rule 14a-8(i)(5) Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(5) provides a basis to exclude	3/13/2020	Yes
Northrop Grumman Corporation	Sisters of St. Dominic of Caldwell New Jersey et al.	1/14/2020	Rule 14a-8(i)(3) Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Unable to concur with exclusion on any of the bases asserted	3/13/2020	No
Northrop Grumman Corporation	CODEPINK – Women for Peace	1/14/2020	Rule 14a-8(b)/(f)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude the co-filer	3/13/2020	No
Liberty Broadband Corporation	LongView LargeCap 500 Index Fund	1/24/2020	Rule 14a-8(b)/(f) Rule 14a-8(e)(2)	Withdrawn	3/13/2020	No
The Southern Company	Andrew Behar; Wynnette M. LaBrosse Trust	1/24/2020	Rule 14a-8(i)(10)	Withdrawn	3/13/2020	No
iRobot Corporation	James McRitchie	1/14/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	3/13/2020	No
Exxon Mobil Corporation	BNP Paribas Asset Management	1/14/2020	Rule 14a-8(i)(11)	Concur that Rule 14a-8(i)(11) provides a basis to exclude	3/13/2020	Yes
JPMorgan Chase & Co.	Oneida Trust Minors et al.	1/13/2020	Rule 14a-8(i)(7)	Unable to concur that Rule 14a-8(i)(7) provide a basis to exclude	3/13/2020	No
T. Rowe Price Group, Inc.	Zevin Asset Management, LLC	1/1/2020	Rule 14a-8(i)(7)	Unable to concur that Rule 14a-8(i)(7) provide a basis to exclude	3/13/2020	Yes
Chevron Corporation	Active Home LLC	1/17/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	3/6/2020	No

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Exxon Mobil Corporation	Active Home LLC	1/17/2020	Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	3/6/2020	No
Alphabet Inc.	CTW Investment Group and Greater Manchester Pension Fund	2/4/2020	Rule 14a-8(i)(12)(i)	Withdrawn	3/6/2020	No
JPMorgan Chase & Co.	Benedictine Sisters of Cullman, Alabama, Inc.	1/13/2020	Rule 14a-8(i)(6) Rule 14a-8(i)(7) Rule 14a-8(i)(10) Rule 14a-8(i)(11)	Withdrawn	3/6/2020	No
JPMorgan Chase & Co.	Benedictine Sisters of Baltimore	1/13/2020	Rule 14a-(e) Rule 14a-8(i)(6) Rule 14a-8(i)(7) Rule 14a-8(i)(10) Rule 14a-8(i)(11)	Withdrawn	3/6/2020	No
JPMorgan Chase & Co.	Boston Walden Trust et al.	1/13/2020	Rule 14a-8(i)(6) Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Withdrawn	3/6/2020	No
Chevron Corporation	Follow This	1/17/2020	Rule 14a-8(b)/(f) Rule 14a-8(i)(7)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	3/6/2020	No
Exxon Mobil Corporation	Follow This	1/14/2020	Rule 14a-8(b)/(f)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	3/6/2020	No
Chevron Corporation	The City of Philadelphia Public Employees Retirement System et al.	1/17/2020	Rule 14a-8(i)(11)	Concur that Rule 14a-8(i)(11) provides a basis to exclude	3/6/2020	No
The Southern Company	John Chevedden	1/23/2020	Rule 14a-8(i)(11)	Concur that Rule 14a-8(i)(11) provides a basis to exclude	3/6/2020	No

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Xerox Holdings Corporation	Kenneth Steiner	1/17/2020	Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	3/6/2020	No
Dollar General Corporation	New York City Employees' Retirement System et al.	1/9/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (ordinary business)	3/6/2020	Yes
Yum! Brands, Inc.	CtW Investment Group	1/10/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (ordinary business)	3/6/2020	No
CVS Health Corporation	New York City Employees' Retirement System et al.	1/14/2020	Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (ordinary business)	3/6/2020	No
Dollar Tree, Inc.	New York City Employees' Retirement System et al.	1/28/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (ordinary business)	3/6/2020	No
Walmart Inc.	CtW Investment Group	2/3/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (ordinary business)	3/6/2020	No
Ameren Corporation	Sierra Club	1/3/2020	Rule 14a-8(i)(7)	Withdrawn	3/6/2020	No
State Street Corporation	James McRitchie	1/10/2020	Rule 14a-8(i)(10)	Withdrawn	3/6/2020	No
AMN Healthcare Services, Inc.	John Chevedden	2/6/2020	Rule 14a-8(c) Rule 14a-8(i)(10)	Unable to concur with exclusion on any of the bases asserted	3/6/2020	No
Exxon Mobil Corporation	Adam Seitchik	1/17/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	3/6/2020	Yes
Exxon Mobil Corporation	The Nathan Cummings Foundation	1/17/2020	Rule 14a-8(i)(10)	Unable to concur that Rule 14a-8(i)(10) provide a basis to exclude	3/6/2020	No

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Intel Corporation	Chris Hotz	1/13/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (ordinary business)	3/6/2020	No
Dominion Energy, Inc.	The Stewart W Taggart and Rebecca W Taggart Revocable Trust et al.	12/30/2019	Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	3/6/2020	No
Sempra Energy	The Stewart W Taggart and Rebecca W Taggart Revocable Trust et al.	1/2/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	3/6/2020	No
PNM Resources, Inc.	Robert Andrew Davis and Sam and Wendy Hitt	1/10/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	3/6/2020	No
Lear Corporation	Sisters of the Good Shepherd NY Province	1/8/2020	Rule 14a-8(i)(10)	Unable to concur that Rule 14a-8(i)(10) provides a basis to exclude	3/6/2020	No
Prudential Financial, Inc.	Bethann Richter	2/19/2020	Rule 14a-8(e)(2)	Withdrawn	2/28/2020	No
Hertz Global Holdings, Inc.	LongView Broad Market 3000 Index Fund	1/6/2020	Rule 14a-8(b)/(f) Rule 14a-8(i)(7)	Withdrawn	2/28/2020	No
JPMorgan Chase & Co.	Maida L Brankman Revocable Trust	1/13/2020	Rule 14a-8(b)/(f)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	2/28/2020	No
JPMorgan Chase & Co.	Brian Patrick Kariger Revocable Trust et al.	1/13/2020	Rule 14a-8(i)(7)	Unable to concur that Rule 14a-8(i)(7) provides a basis to exclude	2/28/2020	No
CSX Corporation	March S. Gallagher	1/2/2020	Rule 14a-8(i)(5) Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	2/28/2020	No
NextEra Energy, Inc.	Hester Angus et al.	1/10/2020	Rule 14a-8(i)(10)	Unable to concur that Rule 14a-8(i)(10) provides a basis to exclude	2/28/2020	No

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Exxon Mobil Corporation	Christopher W. Drexler	1/14/2020	Rule 14a-8(b)/(f) Rule 14a-8(i)(7)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	2/28/2020	Yes
General Electric Company	Martin Harangozo	12/23/2019	(reconsid.) Rule 14a-8(i)(4)	Request for reconsideration denied	2/28/2020	No
Sturm, Ruger & Company, Inc.	Catholic Health Initiatives et al.	1/6/2020	Rule 14a-8(i)(7)	Withdrawn	2/28/2020	No
Abbott Laboratories	John Chevedden	12/20/2019	(reconsid.) Rule 14a-8(i)(10) Rule 14a-8(i)(3)	Request for reconsideration denied	2/27/2020	Yes
AT&T Inc.	Jing Zhao	12/19/2019	(reconsid.) Rule 14a-8(i)(7)	Request for reconsideration denied	2/25/2020	No
Citigroup Inc.	John C. Harrington	12/20/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Unable to concur with exclusion on any of the bases asserted	2/25/2020	No
The Goldman Sachs Group, Inc.	John C. Harrington	12/30/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Unable to concur with exclusion on any of the bases asserted	2/25/2020	No
BlackRock, Inc.	Trio Foundation et al.	1/20/2020	Rule 14a-8(i)(7)	Unable to concur that Rule 14a-8(i)(7) provides a basis to exclude	2/25/2020	No
ConocoPhillips Company	Follow This	1/9/2020	Rule 14a-8(b)/(f) Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	2/25/2020	No
Newell Brands Inc.	John Chevedden	1/3/2020	Rule 14a-8(i)(3) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	2/25/2020	No
Juniper Networks, Inc.	Jing Zhao	12/30/2019	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	2/25/2020	No
Navient Corporation	Employees' Retirement System of Rhode Island	1/20/2020	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	2/25/2020	No

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L Brands, Inc.	John Chevedden	1/10/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	2/25/2020	No
S&P Global Inc.	James McRitchie and Myra K. Young	1/10/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	2/25/2020	No
CDW Corporation	John Chevedden	1/13/2020	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	2/25/2020	No
American Axle & Manufacturing Holdings, Inc.	Pro Cap NYC llc	2/14/2020	Rule 14a-8(e)(2)	Withdrawn	2/25/2020	No
Jounce Therapeutics, Inc.	Pro Cap NYC llc	2/13/2020	Rule 14a-8(e)(2)	Withdrawn	2/25/2020	No
Chesapeake Utilities Corporation	Pro Cap NYC llc	2/14/2020	Rule 14a-8(e)(2)	Withdrawn	2/25/2020	No
CBRE Group, Inc.	AFL-CIO Reserve Fund	12/31/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	2/14/2020	No
Dominion Energy, Inc.	Diana Smith	12/30/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	2/14/2020	No
T. Rowe Price Group, Inc.	James McRitchie	1/1/2020	Rule 14a-8(i)(3) Rule 14a-8(i)(4) Rule 14a-8(i)(6) Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (ordinary business)	2/14/2020	No
General Electric Company	Martin Harangozo	12/23/2019	Rule 14a-8(i)(4)	Concur that Rule 14a-8(i)(4) provides a basis to exclude	2/14/2020	Yes

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O'Reilly Automotive, Inc.	Terry L Miller et al.	12/27/2019	Rule 14a-8(b)/(f) Rule 14a-8(d)/(f) Rule 14a-8(i)(10)	Unable to concur with exclusion under Rule 14a-8(d)/(f) or Rule 14a-8(i)(10) Concur that Rule 14a-8(b)/(f) provides a basis to exclude the co-filers	2/14/2020	No
Republic Services, Inc.	International Brotherhood of Teamsters General Fund	12/30/2019	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	2/14/2020	No
Tribune Publishing Company	TNG-CWA Local 34071	1/9/2020	Rule 14a-8(b)/(f) Rule 14a-8(i)(7)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	2/14/2020	No
Atrion Corporation	Pro Cap NYC llc	2/6/2020	Rule 14a-8(e)(2)	Withdrawn	2/14/2020	No
Euronet Worldwide, Inc.	Pro Cap NYC llc	2/10/2020	Rule 14a-8(e)(2)	Withdrawn	2/14/2020	No
Bank of America Corporation	John C. Harrington	12/20/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Unable to concur with exclusion on any of the bases asserted	2/12/2020	No
Johnson & Johnson	Vermont Pension Investment Committee	12/20/2019	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	2/12/2020	Yes
Bristol-Myers Squibb Company	The City of Philadelphia Public Employees Retirement System	12/23/2019	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	2/12/2020	No
Amgen Inc.	The City of Philadelphia Public Employees Retirement System	1/17/2020	Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	2/12/2020	No

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Abbot Laboratories	Vermont Pension Investment Committee	12/20/2019	Rule 14a-8(b)/(f) Rule 14a-8(i)(3) Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Unable to concur with exclusion on any of the bases asserted	2/12/2020	Yes
McDonald's Corporation	The City of Philadelphia Public Employees Retirement System	1/20/2020	Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Unable to concur with exclusion on any of the bases asserted	2/12/2020	No
Xerox Holdings Corporation	The City of Philadelphia Public Employees Retirement System et al.	1/17/2020	Rule 14a-8(i)(3) Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	2/12/2020	No
Johnson & Johnson	Hammerman Family Revocable Inter Vivos Trust and the UAW Retiree Medical Benefits Trust	12/18/2019	Rule 14a-8(c) Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (micromanagement)	2/12/2020	Yes
Dow Inc.	Kenneth Steiner	12/26/2019	Rule 14a-8(b)/(f) Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	2/12/2020	No
Fortive Corporation	John Chevedden	12/19/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	2/12/2020	No
Norfolk Southern Corporation	Steve Strauss	12/20/2019	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (ordinary business)	2/12/2020	No
Community Trust Bancorp, Inc.	Presbyterian Church (U.S.A.)	12/30/2019	Rule 14a-8(b)/(f) Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Withdrawn	2/12/2020	No
Wells Fargo & Company	Harrington Investments, Inc.	12/27/2019	Rule 14a-8(i)(10)	Withdrawn	2/12/2020	No

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Wells Fargo & Company	Oliver and Jennifer Blackman	12/27/2019	Rule 14a-8(i)(10)	Withdrawn	2/12/2020	No
Exxon Mobil Corporation	Richard C. Stell	1/14/2020	Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Withdrawn	2/12/2020	No
Designer Brands Inc.	Pro Cap NYC llc	2/7/2020	Rule 14a-8(e)(2)	Withdrawn	2/12/2020	No
SeaWorld Entertainment, Inc.	People for the Ethical Treatment of Animals	2/1/2020	Rule 14a-8(i)(3) Rule 14a-8(i)(4) Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Withdrawn	2/7/2020	No
Highlands REIT, Inc.	Robert Sarasin	1/3/2020	Rule 14a-8(i)(1) Rule 14a-8(i)(2) Rule 14a-8(i)(6) Rule 14a-8(i)(7)	Concur that Rules 14a-8(i)(2) and (i)(6) provide bases to exclude	2/7/2020	Yes
InvenTrust Properties Corp.	Eric Branfman	12/17/2019	Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	2/7/2020	Yes
J.B. Hunt Transport Services, Inc.	Trillium Small/Mid Cap Fund et al.	12/23/2019	Rule 14a-8(i)(7)	Unable to concur that Rule 14a-8(i)(7) provides a basis to exclude	2/7/2020	No
Chipotle Mexican Grill, Inc.	New York State Common Retirement Fund	12/23/2019	Rule 14a-8(i)(10)	Unable to concur that Rule 14a-8(i)(10) provides a basis to exclude	2/7/2020	No
HollyFrontier Corporation	United Steelworkers	12/23/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Withdrawn	2/7/2020	No
JPMorgan Chase & Co.	John C. Harrington	1/13/2020	Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	2/5/2020	Yes
Abbott Laboratories	John Chevedden	12/20/2019	Rule 14a-8(i)(10)	Unable to concur that Rule 14a-8(i)(10) provides a basis to exclude	2/5/2020	No

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NCR Corporation	Myra K. Young	12/20/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	2/5/2020	No
Pfizer Inc.	Thomas Strobhar	12/20/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	2/5/2020	No
Bank of America Corporation	National Center for Public Policy Research	12/20/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	2/5/2020	No
Citigroup Inc.	National Center for Public Policy Research	12/20/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	2/5/2020	No
General Electric Company	Bartlett Naylor et al.	12/23/2019	Rule 14a-8(i)(10)	Withdrawn	2/5/2020	No
Wells Fargo & Company	Brian Patrick Kariger Revocable Trust et al.	12/27/2019	Rule 14a-8(i)(10)	Withdrawn	2/5/2020	No
PayPal Holdings, Inc.	NorthStar Asset Management, Inc. Funded Pension Plan	1/17/2020	Rule 14a-8(a) Rule 14a-8(i)(3)	Withdrawn	1/31/2020	No
Facebook, Inc.	Thomas Van Dyck	1/21/2020	Rule 14a-8(i)(7)	Withdrawn	1/31/2020	No
PACCAR Inc	New York City Employees' Retirement System et al.	12/19/2019	Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	1/31/2020	No
Eli Lilly and Company	John Chevedden	12/21/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	1/31/2020	No
JPMorgan Chase & Co.	The Nathan Cummings Foundation	1/13/2020	Rule 14a-8(i)(11)	Withdrawn	1/31/2020	No
JPMorgan Chase & Co.	The Lindsay C Bridges Revocable Trust	1/13/2020	Rule 14a-8(e)(2) Rule 14a-8(i)(7)	Withdrawn	1/31/2020	No
Pfizer Inc.	National Center for Public Policy Research	12/19/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	1/31/2020	No
Johnson & Johnson	National Center for Public Policy Research	12/12/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	1/31/2020	No

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AT&T Inc.	National Center for Public Policy Research	12/12/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	1/31/2020	No
AT&T Inc.	Jing Zhao	12/19/2019	Rule 14a-8(i)(3)	Unable to concur that Rule 14a-8(i)(3) provides a basis to exclude	1/31/2020	Yes
Dollar General Corporation	John Chevedden	12/18/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	1/31/2020	No
First Horizon National Corporation	Jack Van Valkenburgh	12/20/2019	Rule 14a-8(i)(5) Rule 14a-8(i)(7) Rule 14a-8(i)(10)	Withdrawn	1/31/2020	No
Johnson & Johnson	Oneida Trust Minors et al.	12/13/2019	Rule 14a-8(i)(7)	Unable to concur that Rule 14a-8(i)(7) provides a basis to exclude	1/29/2020	Yes
Pfizer Inc.	The Sisters of St. Francis of Philadelphia et al.	12/19/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Unable to concur with exclusion on any of the bases asserted	1/29/2020	No
AbbVie Inc.	Rhode Island Employees' Retirement Systems Pooled Trust and Vermont Pension Investment Committee	12/20/2019	Rule 14a-8(i)(7)	Unable to concur that Rule 14a-8(i)(7) provides a basis to exclude	1/29/2020	No
Hewlett Packard Enterprise Company	John Chevedden	11/22/2019	Rule 14a-8(i)(2) Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Unable to concur with exclusion on any of the bases asserted	1/29/2020	No
Abbott Laboratories	Kenneth Steiner	12/20/2019	Rule 14a-8(c) Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Unable to concur with exclusion on any of the bases asserted	1/29/2020	No
Honeywell International Inc.	John Chevedden	12/23/2019	Rule 14a-8(i)(2) Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Unable to concur with exclusion on any of the bases asserted	1/29/2020	No

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Wells Fargo & Company	John Chevedden	12/27/2019	Rule 14a-8(i)(7)	Unable to concur that Rule 14a-8(i)(7) provides a basis to exclude	1/29/2020	No
JPMorgan Chase & Co.	John Chevedden	1/13/2020	Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Unable to concur with exclusion on any of the bases asserted	1/29/2020	No
The Home Depot, Inc.	John Chevedden	1/21/2020	Rule 14a-8(i)(7)	Unable to concur that Rule 14a-8(i)(7) provides a basis to exclude	1/29/2020	No
The Bank of New York Mellon Corporation	Kenneth Steiner	12/13/2019	Rule 14a-8(b)/(f) Rule 14a-8(i)(10)	Unable to concur with exclusion on any of the bases asserted	1/24/2020	No
The Bank of New York Mellon Corporation	Kenneth Steiner	12/13/2019	Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	1/24/2020	No
Bank of America Corporation	Thomas Strobhar	12/20/2019	Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	1/24/2020	No
Moody's Corporation	James McRitchie and Myra K. Young	12/18/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	1/24/2020	No
Quest Diagnostics Incorporated	John Chevedden	12/23/2019	Rule 14a-8(h)(3)	Concur that Rule 14a-8(h)(3) provides a basis to exclude	1/24/2020	No
Cadence Design Systems, Inc.	John Chevedden	12/31/2019	Rule 14a-8(i)(3)	Unable to concur that Rule 14a-8(i)(3) provides a basis to exclude	1/24/2020	No
AutoNation, Inc.	John Chevedden	12/18/2019	Rule 14a-8(i)(3)	Unable to concur that Rule 14a-8(i)(3) provides a basis to exclude	1/24/2020	Yes
CoreCivic, Inc.	Alex Friedmann	1/13/2020	Rule 14a-8(i)(6) Rule 14a-8(i)(7)	Withdrawn	1/24/2020	No
Southwestern Energy Company	Kenneth Steiner	1/3/2020	Rule 14a-8(b)/(f) Rule 14a-8(c)	Unable to concur with exclusion on any of the bases asserted	1/24/2020	No

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International Business Machines Corporation	Kenneth Steiner	11/27/2019	(reconsid.) Rule 14a-8(b)/(f) Rule 14a-8(e)(2)	Request for reconsideration denied	1/17/2020	Yes
Apple Inc.	National Center for Public Policy Research	10/22/2019	(reconsid.) Rule 14a-8(i)(7) Rule 14a-8(i)(10) Rule 14a-8(i)(12)(i)	Request for reconsideration and Commission review denied (untimely request)	1/17/2020	Yes
General Dynamics Corporation	John Chevedden	12/18/2019	Rule 14a-8(i)(3)	Unable to concur that Rule 14a-8(i)(3) provides a basis to exclude	1/16/2020	No
MGM Resorts International	Thomas Strobhar	12/30/2019	Rule 14a-8(i)(4) Rule 14a-8(i)(7)	Withdrawn	1/16/2020	No
PPG Industries, Inc.	John Chevedden	12/16/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	1/16/2020	No
Kaman Corporation	John Chevedden	12/13/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	1/16/2020	No
Huntsman Corporation	Trio Foundation et al.	12/19/2019	Rule 14a-8(b)/(f)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	1/16/2020	No
PPG Industries, Inc.	Congregation of the Sisters of St. Joseph of Peace	12/16/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	1/16/2020	No
Pfizer Inc.	John Chevedden	12/19/2019	Rule 14a-8(i)(3)	Unable to concur that Rule 14a-8(i)(3) provides a basis to exclude	1/16/2020	No
Kohl's Corporation	Congregation of Divine Providence et al.	12/19/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	1/16/2020	No
QEP Resources, Inc.	John Chevedden	12/13/2019	Rule 14a-8(b)/(f)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	1/9/2020	No

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NorthWestern Corporation	Thomas Tosdal	12/17/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(7)	No view (pending litigation)	1/9/2020	Yes
Ferro Corporation	Kenneth Steiner	11/27/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	1/9/2020	No
The Allstate Corporation	Kenneth Steiner	12/13/2019	Rule 14a-8(h)(3)	Concur that Rule 14a-8(h)(3) provides a basis to exclude	1/9/2020	No
Citigroup Inc.	Peter Lindner	12/20/2019	Rule 14a-8(b)/(f) Rule 14a-8(e)(2) Rule 14a-8(i)(4)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	1/9/2020	No
Newmont Goldcorp Corporation	New York State Common Retirement Fund	12/27/2019	Rule 14a-8(e)(2)	Withdrawn	1/9/2020	No
The Boeing Company	James McRitchie and Myra K. Young	12/20/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Withdrawn	1/9/2020	No
AT&T Inc.	John Chevedden	11/15/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	1/9/2020	No
International Business Machines Corporation	Kenneth Steiner	11/27/2019	Rule 14a-8(b)/(f) Rule 14a-8(e)(2)	Unable to concur with exclusion on any of the bases asserted	12/20/2019	No
Apple Inc.	National Center for Public Policy Research	10/22/2019	Rule 14a-8(i)(7) Rule 14a-8(i)(10) Rule 14a-8(i)(12)(i)	Concur that Rule 14a-8(i)(7) provides a basis to exclude	12/20/2019	Yes
HP Inc.	Yul Kim	11/25/2019	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (ordinary business)	12/20/2019	No
Verizon Communications Inc.	William C. Fleming	11/29/2019	Rule 14a-8(b)/(f) Rule 14a-8(e) Rule 14a-8(i)(7)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	12/20/2019	No

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TimkenSteel Corporation	Pro Cap NYC llc	12/11/2019	Rule 14a-8(e)(2)	Concur that Rule 14a-8(e)(2) provides a basis to exclude	12/20/2019	No
The Manitowoc Company, Inc.	John Chevedden	12/10/2019	Rule 14a-8(b)/(f)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	12/20/2019	No
Lennar Corporation	Morris Propp et al.	12/6/2019	Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude	12/20/2019	Yes
Applied Materials, Inc.	Kenneth Steiner	11/4/2019	Rule 14a-8(i)(10)	Concur that Rule 14a-8(i)(10) provides a basis to exclude	12/20/2019	No
Genuine Parts Company	Lutra Living Trust	12/2/2019	Rule 14a-8(b)/(f)	Unable to concur that Rule 14a-8(b)/(f) provides a basis to exclude	12/20/2019	No
Wynn Resorts, Limited	James McRitchie and Myra K. Young	11/12/2019	Rule 14a-8(b)/(f)	Withdrawn	12/13/2019	No
Sprint Corporation	William C. Fleming	11/27/2019	Rule 14a-8(b)/(f)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	12/13/2019	No
Philip Morris International Inc.	Alan Ball	11/8/2019	Rule 14a-8(i)(13)	Concur that Rule 14a-8(i)(13) provides a basis to exclude	12/13/2019	No
International Business Machines Corporation	Joseph Manno	11/13/2019	Rule 14a-8(b)/(f) Rule 14a-8(i)(13)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	12/13/2019	Yes
AT&T Inc.	Ernest and Lynne Bailey	10/28/2019	Rule 14a-8(b)/(f)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	12/9/2019	Yes
The Walt Disney Company	Karen Lizette Perricone Revocable Trust	10/21/2019	Rule 14a-8(i)(3) Rule 14a-8(i)(7)	Concur that Rule 14a-8(i)(7) provides a basis to exclude (ordinary business)	12/6/2019	No
The Walt Disney Company	Congregation of Sisters of St. Agnes et al.	10/21/2019	Rule 14a-8(i)(10)	Unable to concur that Rule 14a-8(i)(10) provides a basis to exclude	12/6/2019	No

Company that submitted the reasons for excluding the proposal.	Shareholder that submitted the proposal to the company.	Date of company's initial submission.	Regulatory bases asserted by company to exclude the proposal.	Staff's response to the company's request.	Date of staff's response.	Did the staff respond by letter?
The Walt Disney Company	National Center for Public Policy Research	10/21/2019	Rule 14a-8(i)(10) Rule 14a-8(i)(11)	Concur that Rule 14a-8(i)(11) provides a basis to exclude	12/6/2019	No
Apple Inc.	Jing Zhao	10/18/2019	Rule 14a-8(i)(3)	Concur that Rule 14a-8(i)(3) provides a basis to exclude	12/6/2019	Yes
Apple Inc.	David Adams et al.	10/18/2019	Rule 14a-8(i)(12)(ii)	Unable to concur that Rule 14a-8(i)(12)(ii) provides a basis to exclude	12/6/2019	No
Wheeler Real Estate Investment Trust, Inc.	Alan Bowers	11/8/2019	Rule 14a-8(b)/(f)	Unable to concur that Rule 14a-8(b)/(f) provides a basis to exclude	12/3/2019	Yes
Oshkosh Corporation	John Chevedden	9/27/2019	Rule 14a-8(i)(2) Rule 14a-8(i)(6)	Concur that Rule 14a-8(i)(2) provides a basis to exclude	11/21/2019	Yes
QUALCOMM Inc.	J. Michael Schaefer	10/1/2019	Rule 14a-8(b)/(f)	Concur that Rule 14a-8(b)/(f) provides a basis to exclude	11/21/2019	No