



# Guidance for Electronic Filing and Serving Of Documents in SEC Administrative Proceedings

Office of the Secretary  
U.S. Securities and Exchange Commission

## Date:

On \_\_date\_\_, the Commission's Rules of Practice (Rules) (17 CFR §§ 201.100 – 201.1106) were amended to require the electronic filing and serving of documents in Commission administrative proceedings as defined in Rule 101(a)(3), (a)(4), and (a)(9)(ii-v) (17 CFR § 201.101(a)). (Exchange Act Rel. No. \_\_\_\_\_ (date)[link to Release]). This guidance describes the procedures for the electronic filing of administrative proceeding documents with the Commission's Office of the Secretary (OS) and for electronic service of documents on parties and representatives ("participants") in those proceedings.

The Commission's Rules of Practice and this guidance are available on the Commission's website on the Rules of Practice page at <http://www.sec.gov/about/rulesofpractice.shtml>. This guidance is issued by OS and is intended to supplement and clarify, but not supersede, the Rules.

## Introduction

Participants must submit filings electronically in administrative proceedings using the Commission's Electronic Filings in Administrative Proceedings (eFAP) system located on the Commission's website, [www.sec.gov](http://www.sec.gov), at [http://www.sec.gov/\(insert eFAP link\)](http://www.sec.gov/(insert eFAP link)). Participants must also accept service of documents electronically from eFAP and, as explained in more detail below serve each other electronically.

**Participants are advised to read this guidance and the eFAP User Manual (insert link) in their entirety prior to making a filing or serving other participants.**

## What is eFAP?

The eFAP system automates the filing and serving processes in administrative proceedings. Except during the 90-day Phase-in Period explained below (*see* paragraph 1.3), the system replaces paper filings in administrative proceedings by allowing OS to receive participants' filings electronically. It also allows OS to electronically serve orders, notices, and other administrative proceeding documents on participants. It does not allow participants to serve each other electronically. Documents submitted through eFAP will not result in the service of documents on parties or other interested persons as required by Rule 150 (17 CFR § 201.150). See paragraph \_\_ for guidance serving parties or other interested persons pursuant Rule 150.

## Section 1. Scope of eFAP

### **1.1 Who must use eFAP?**

Absent a certification of inability to file electronically, as explained in more detail below (*see* paragraph 6.1), eFAP must be used by: (1) all participants in administrative proceedings as defined in Rule 101(a)(3), (a)(4), and (a)(9)(ii-v)), including an enforcement or disciplinary proceeding, a proceeding to review a Self-Regulatory Organization (SRO) or a Public Company Accounting Oversight Board (PCAOB) determination; and (2) all persons and their representatives granted leave to participate in a proceeding pursuant to Rule 210 (17 CFR § 201.210).

### **1.2 What documents must be filed in eFAP?**

All documents required to be filed and served in an administrative proceeding pursuant to Rules 150(a) and 151(a) (17 CFR §§ 201.150(a) and 201.151(a)), including notices of appearance, motions, briefs, or other written communications, must be filed using eFAP. Participants are also required to use eFAP to transmit hearing exhibits to OS pursuant to Rule 351(c) (17 CFR §§ 201.351(c)), and certified records and record indexes from SROs (Rule 420(e)) or the PCAOB (Rule 440(d)). All documents must be served electronically outside of the system by email, except for the service of subpoenas for purposes of investigations as required by 17 CFR § 203.8 (Investigative Subpoenas). Investigative Subpoenas may be served electronically outside of the system or by other delivery methods prescribed in Rule 150(d).

### **1.3 Is there a Phase-in Period?**

Yes. There is a 90-day phase-in period through [date]. During this period, in addition to making electronic filings through eFAP, participants must file three (3) paper copies of the complete electronic filing, including all attachments, with OS, using any Delivery Method prescribed in paragraph 4.4 below.

### **1.4 What if a proceeding started before the effective date?**

Participants in administrative proceedings which were opened prior to [date], the effective date of the amended Rules requiring electronic filing and service, **must make a new Rule 102(d) compliant filing on or before [date]** [ten (10) business days from the effective date]. A new filing is required even if a prior Rule 102(d) filing included the participant's email address (*see* paragraph 2.1 below for more information regarding Rule 102(d) (17 CFR § 201.102(d)) filings).

Documents filed in these proceedings prior to the effective date will not be available in the system. Documents filed electronically in eFAP on or after the effective date will be available in the system only to the participant who made the filing. However, significant filings will continue to be made publicly available on the Commission website's Administrative Proceedings Documents page [insert link].

## Section 2. Getting Started

### 2.1 How do I log-in to eFAP?

A User Name and password are required to log-in to eFAP. The email address at which you wish to receive documents in the proceeding must be provided, and, for non-SEC Users, will serve as your eFAP User Name. Your User Name *must match* the email address that you provide in the filing required by Rule 102(d) (described below).

- **If you are *not* a member of the SEC staff:**

**You must register your email address with eFAP before your first log-in to the system.**

To register, access the system on the Commission's website and click on the "Register with eFAP" link. Registration requires that you:

- Provide the email address at which you will receive service;
- Provide your name and phone number;
- Create a password; and
- Agree to eFAP's Terms and Conditions of use.

Note that Rule 102(d) contains a requirement that you file and keep current your contact information for receiving service of documents from the Commission and other participants in a proceeding. As amended, Rule 102(d) requires you to provide an email address for service. Consequently, your first filing in a proceeding must include a notice of appearance (if you are an attorney or other representative) or a document that is otherwise Rule 102(d) compliant. If you are a participant in multiple administrative proceedings, you must file a notice of appearance or a Rule 102(d) compliant document in each of those proceedings.

For more detailed instructions on how to register, please refer to the online eFAP User Manual (insert link).

- **If you are a member of the SEC staff:** You do not need to register and can log-in to the eFAP system using your regular SEC credentials.

SEC staff are required to file a notice of appearance, as required by Rule 102(d), in each proceeding in which they will make filings and serve or receive documents.

**Please note that registering with, and/or logging-in to, eFAP does not meet the requirements of Rule 102(d) to file your contact information (including email address) with the Commission.**

## 2.2 Can I change my email address used in eFAP?

Yes, but you must make a Rule 102(d) filing to update your email address. Any documents issued by OS will continue to be served to your prior Rule 102(d) email address until the processing of a change is complete. Filings under Rule 102(d), including filings made to update Rule 102(d) contact information, can take up to two (2) business days to process. Once complete, OS will serve you at the new email address, but you will be unable to download served documents until the new email address is registered in eFAP as your system User Name.

**Note that the history of the documents filed and served to you by OS under your retired User Name will not transfer to your new User Name account.** However, you may continue to access that information using your retired User Name and password.

## Section 3. Basics of Filing and Serving

### 3.1 How do I file documents?

After successfully logging into the system, you should select “Submit Filings” when the matter has been assigned an Administrative Proceeding File Number (3-#####). You should select “Submit Applications for Review” if an Administrative Proceeding File Number has not yet been assigned (*e.g.*, when filing an Application for Review of a decision of a SRO or the PCAOB, or an Application for an Order Setting Aside a Rule Change). For details on how to file documents using eFAP, please refer to the online eFAP User Manual ([insert link](#)).

### 3.2 How will I know my filing was received on time?

All filings will be date-stamped by the system upon receipt. You will also receive a confirmation email indicating the date received. In addition, your history of uploads to the system will indicate the date received.

Electronic filings must be completed before midnight Eastern Time, on the due date established for the filing, as required by Rules 151(a) and 152(a). If a large filing requires multiple submissions (*see* data size limitations, paragraph 4.2 below), the date the last transmission made to complete the filing was received will be used to determine timeliness. You are encouraged to make electronic submissions during the Commission’s business hours (9:00 a.m. – 5:30 p.m., Eastern Time, on weekdays that are not Federal holidays). **Filings submitted using other electronic media (paragraph 4.4 below) must be received on the due date established for the filing during the Commission’s business hours noted above.** (*See* Rule 152(a)(2)).

### 3.3 What if I realize that I have filed the wrong document after a filing transaction is complete?

If you file the wrong document, you should immediately file the correct document and contact OS. OS will take action to correct the error.

### 3.4 If I file documents, will they be automatically served on other participants?

No. Filing documents electronically using eFAP will send documents only to OS and will not constitute service on Commission staff or other participants in an administrative proceeding. All documents must be served electronically outside of the system by email. [A subsequent release of eFAP which includes service between parties is planned. This guidance will be updated when such service becomes available in the system.]

*Note: Investigative Subpoenas are not served using eFAP (see paragraph 1.2 above).*

### 3.6 How will I be notified that I can serve electronically in a proceeding?

You can serve any participant by email as soon as you are served with the participant's Rule 102(d) compliant filing.

### 3.7 What if I need to serve a document before I receive a participant's Rule 102(d) filing?

If the person to be served has not yet made a Rule 102(d) compliant filing, or has filed a certification of inability to file or serve electronically pursuant to Rules 150(c)(1) or 152(a)(2) (see section 6), you should use an alternative method of service provided in Rule 150(d).

### 3.9 How do I receive documents from other participants, hearing officers, and the Commission?

Participants must serve documents by email to the email address provided in your Rule 102(d) compliant filing.

Served documents from hearing officers and the Commission will be sent by eFAP to the email address provided in your Rule 102(d) compliant filing. The service email will contain link(s) to the document(s) served by OS. If not already logged in to eFAP when you click on the link(s), you will be prompted to log-in to eFAP to complete the download of the served documents. Pursuant to Rule 150(e), electronic service is complete upon transmission. (17 CFR § 201.150(e)). **Failure to either open the email or download the documents will not render service incomplete.** For instructions on how to download served documents using eFAP, please refer to the online eFAP User Manual (insert link).

## Section 4. Preparing Documents for Filing

### 4.1 How do I prepare documents for filing?

- 4.1.1 Acceptable File Formats:** Documents submitted electronically must be in a portable document format (PDF), and as specified below, certain documents must be in a searchable optical character recognition (OCR) form of the PDF format (OCR PDF). PDF format is a non-modifiable electronic file that is converted to a format that will look the same on a computer screen and in print, regardless of the printer used to print it, and regardless of the software package originally used to create it. If it is necessary to submit a filing in a format other than PDF (*e.g.*, audio

or video file), you should submit the filing using other electronic media as prescribed in paragraph 4.4 below.

- **Main Document:** The “Main Document” filed (*e.g.*, an application, petition, answer, or motion together with any supporting brief, and the certificates of service and of redaction or omission of Sensitive Personal Information (SPI)(*see* paragraph 4.1.2 below)) must be in the OCR PDF format and uploaded as a single file. When filing a motion together with a supporting brief, be sure to indicate in the “Filing Description” field that the document includes a supporting brief as well as the motion. Choose “Filing” as the Document Type for this document.
- **Attachments:** Although OCR PDF format is preferred, attachments or exhibits to the Main Document may be scanned to a non-OCR PDF format. Each attachment must be uploaded as a separate file. If there are multiple attachments to a filing, the filer must include an index of those documents uploaded as a separate file. *See* Attachment A for a Sample Index of Attachments. In addition, each attachment document must begin with a cover sheet (*i.e.*, a divider page) with a number or other identifier (*e.g.*, A, B, C, etc.) that corresponds to its entry in the index. *See* Attachment B for a Sample Attachment Divider Page.

Each attachment must be uploaded as a separate file. The attachment file(s) should be uploaded with the Main Document file and submitted together as one filing transaction; but if together they exceed the data size limitations, then the Main Document should be transmitted first. In eFAP, choose “Attachment” as the Document Type for this document.

**4.1.2 Sensitive Personal Information (SPI) Certification:** When filing a document electronically, you will be required to confirm compliance with the Rules concerning the redaction or omission of SPI. For SPI guidance, *see* Rules 151(e) (filings generally), 351(c) (hearing exhibits), 420(e) (SRO records), and 440(d) (PCAOB records) (17 CFR §§ 201.151(e), 201.351(c), 201.420(e), and 201.440(d)).

**4.1.3 Signature:** Filings requiring a signature pursuant to Rule 153 (17 CFR § 201.153) may be signed with the “/s/” notation on any applicable signature lines. (Rules 152(c) and 351(c)(3)).

**4.1.4 Naming Files for Upload:** You must use the following naming convention for all uploaded files: Administrative Proceeding File Number\_Date [YYYY-MM-DD]\_Party Name\_Document Description.pdf (e.g., 3-12345\_2013-08-09\_Smith\_Motion for Summary Disposition.pdf; 3-12345\_2014-08-09\_Smith\_Attachment 1 to Motion for Summary Disposition.pdf).

- No File Number: If a File Number (3-#####) has not yet been assigned, the file name begins with the Date of the filing (e.g., 2014-08-09\_Smith\_Application for Review of SRO Decision.pdf).
- Under Seal Documents: If documents are subject to an existing protective order or the filer is requesting confidentiality pursuant to Rule 322(b) (17 CFR § 201.322(b)), the file name of the Under Seal version must begin with “Under Seal” (e.g., Under Seal\_3-12345\_2014-08-09\_Smith\_Motion for Summary Disposition.pdf; Under Seal\_3-12345\_2014-08-29\_Smith\_Attachments 1-10 to Motion for Summary Disposition.pdf). For additional guidance on submission of under seal documents, see paragraph 5.2 below.
- Ex Parte Documents: *Ex parte* motions and supporting documentation to *ex parte* motions must begin with “Under Seal” and the Document Description must include the text “Ex Parte” (e.g., Under Seal\_3-12345\_2014-08-09\_Smith\_Ex Parte Motion for Stay of Proceeding.pdf; Under Seal\_3-12345\_2014-08-29\_Smith\_Attachments 1-10 to Ex Parte Motion for Stay of Proceeding.pdf). For additional guidance on submission of *ex parte* documents, see paragraph 5.3 below.
- Certified Records: If the document is the Under Seal version of a certified record or record index from a SRO (Rule 420(e)) or the PCAOB (Rule 440(d)), follow the instructions for under seal documents above. For additional guidance on submission of certified records and record indexes, see paragraph 5.5 below.

#### **4.2 Is there a limit to the size of a document that can be filed using eFAP?**

Yes. A single PDF document may be no larger than 500 megabytes (500 MB). Multiple documents may be uploaded in one filing transaction, but the total file size may not exceed 500 MB. If the documents to be submitted for one filing total more than 500 MB, the documents must be divided into transmissions of 500 MB or less. When the submission of the first transaction is complete, you can elect to submit another filing. When the new upload screen opens, you can upload the additional documents.

#### **4.3 What if my document exceeds the file size limit?**

If a single document exceeding 500 MB cannot be divided into multiple smaller files, you should submit the filing using other electronic media as prescribed in paragraph 4.4 below.

#### 4.4 How do I file non-PDF documents or other electronic media?

If it is necessary to submit a filing in a format other than PDF (*e.g.*, audio or video file), or a document exceeds the data size limit of 500 MB and cannot be broken into multiple files, the filing must be submitted to OS using one of the following **Acceptable Electronic Media**:

- CD-R CD-ROMs formatted to ISO 9660 specifications;
- DVD-ROM for Windows-compatible personal computers; or
- USB 2.0 thumb drives for Windows-compatible personal computers.

Electronic media must be properly packaged to prevent damage and must not be encrypted. The media must be accompanied by a “Notice of Manual Filing” which includes the information prescribed for filings in Rule 152(b)(3), describes the subject matter of the filing, and the reason(s) why the filing could not be submitted using eFAP. *See* Attachment C for a sample Notice of Manual Filing. The Notice must also be electronically filed and served. Delivery of the package and the hard copy Notice must be made by one of the following **Delivery Methods**:

- U.S. Postal Service first class, certified, registered, or Priority Mail Express; or
- Commercial courier or express delivery service.

The following address should be used when sending or delivering materials:

Office of the Secretary  
U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, D.C. 20549-1090

**Note:** Filings submitted using other electronic media must be received on the due date established for the filing during the Commission’s business hours (9:00 a.m. – 5:30 p.m., Eastern Time, on weekdays that are not Federal holidays). (*See* Rule 152(a)(2)).

#### 4.5 Are there any document security considerations?

Documents must be free of active content, viruses, or malicious code. You are responsible for taking all reasonable steps to prevent submission of material that does not meet these security requirements. Rejection of a document for failure to meet the security requirements may not excuse an untimely filing.

### **Section 5. Filing Particular Types of Documents**

#### 5.1 How do I handle cover letters?

Non-substantive transmittal letters with electronic filings are discouraged. If it is necessary to send a cover letter to OS with an electronic filing, file the cover letter as an Attachment with the Main Document. Please note that Attachments become part of the official record of the proceeding.



## 5.2 Can I use eFAP to file confidential or under seal documents?

Yes; however, if you are required to file the documents under Rule 322(b), then two versions of the documents must be filed:

- (1) A complete, sealed copy of the materials containing the information as to which a protective order is sought, with the allegedly confidential information marked as such, and with the first page of the document labeled “Under Seal” (Under Seal Version); and
- (2) A redacted copy of the materials containing the information as to which a protective order is sought, with the allegedly confidential information redacted (Redacted Version). The redacted version shall indicate any omissions with brackets or ellipses, and its pagination and depiction of text on each page shall be identical to that of the sealed version.

If a document would be redacted in its entirety, a redacted version need not be filed.

The Under Seal Version and the Redacted Version must be uploaded as separate files. It is recommended that you first upload the Redacted Version, including the Main Document file and any attachment files, by following the instructions for preparing documents for filing in paragraph 4.1 above. You can follow the same instructions to upload the Under Seal Version, but, in addition, you must name the sealed files using the “Under Seal” naming convention (*i.e.*, the file name leads with “Under Seal”) and must mark the “Under Seal” field when uploading the Under Seal Version of the Main Document file and for any Under Seal attachment files.

## 5.3 Can I use eFAP to file *ex parte* documents?

Yes. You can follow the same instructions to prepare documents for filing, *see* paragraph 4.1 above, but, in addition:

- (1) Use the “*Ex Parte*” naming convention which requires the file name to lead with “Under Seal” and include the text “Ex Parte” in the Document Description; and
- (2) Mark the “Under Seal” field when uploading the Main Document file and any Attachment files.

## 5.4 Can I use eFAP to file hearing exhibits?

Yes. Rule 351(c) requires the electronic filing of exhibits admitted, or offered and not admitted, during the hearing, and any other exhibits that were admitted after the hearing. Although OCR PDF format is preferred, exhibits may be scanned to a non-OCR PDF format. Each hearing exhibit must be uploaded as a separate file. Multiple transmissions may be required to upload all hearing exhibits (*see* size limits in paragraph 4.2 above). The first transmission must include an index of all the hearing exhibits. *See* Attachment D, Sample Index of Hearing Exhibits. In addition, each hearing exhibit must be clearly marked on its first page or begin with a cover sheet (*i.e.*, a divider page) with a number or other identifier (*e.g.*, Respondent’s EX 1, Respondent’s EX

2, Respondent's EX 3, etc.) that corresponds to its entry in the list. See Attachment E, Sample Hearing Exhibit Divider Page. In eFAP, choose the Document Type: "Hearing Exhibit/Admitted" or "Hearing Exhibit/Offered Not Admitted" as appropriate. **Please note that the index that accompanies the filing is not a substitute for any exhibit list which may be ordered by the hearing officer as a separate filing.**

### **5.5 How do I file SRO or PCAOB Certified Records and Record Indexes?**

Appeals of determinations by SROs or the PCAOB require a complete, clean copy of the record upon which the action complained of was taken and an index to such record. Rules 420(e) (SROs) and 440(d) (PCAOB). If such record or record index contains any Sensitive Personal Information (SPI), two versions must be filed:

- (1) A clean, sealed copy with the first page of the document labeled "Under Seal" (Under Seal Version); and
- (2) A redacted copy with the SPI redacted (Redacted Version).

Although OCR PDF format is preferred, records may be scanned to a non-OCR PDF format. Record indexes must be in OCR PDF format. The Under Seal Version and the Redacted Version must be uploaded as separate files. It is recommended that you first upload the Redacted Version by following the instructions for preparing documents for filing in paragraph 4.1 above. You can follow the same instructions to upload the Under Seal Version, but, in addition, you must name the sealed files using the "Under Seal" naming convention (*i.e.*, the file name leads with "Under Seal") and must mark the "Under Seal" field when uploading the Under Seal Version. In eFAP, choose "Certified Record" as the Document Type for these documents.

## **Section 6. Certifications of Inability to File and Serve Electronically**

### **6.1 Can I obtain a waiver of the requirements to file and serve electronically?**

If you cannot reasonably file and serve electronically due to a lack of access to electronic transmission devices, you must file a certification of inability to file and serve electronically that meets the requirements of Rules 150(c)(1) and 152(a)(1), and if applicable, Rule 351(c)(2). If you are a participant in multiple administrative proceedings, you must file and serve a certification in each proceeding. All certifications must be filed using any additional method listed in Rule 152(a)(2) and be served using any additional method listed in Rule 150(d).

### **6.2 How will I know if a participant has filed a certification of inability to electronically file or serve?**

The participant making the certification is required to serve you using any additional method of service prescribed in Rule 150(d).

## **Section 7. Getting More Information About eFAP**

### **7.1 How can I learn how to file and serve using eFAP?**

The eFAP User Manual, with step-by-step instructions, can be found online at [insert sec.gov link].

**7.2 Unavailability of eFAP System:** Should eFAP become temporarily unavailable, or other unforeseen technical difficulties arise, you should access the Rules of Practice page on the Commission's website at <http://www.sec.gov/about/rulesofpractice.shtml> for directions from the Office of the Secretary on alternate means of filing.

**7.3 Contact Information for the Office of the Secretary:** If you have questions regarding electronic filing or serving, please contact the Office of the Secretary at (202) 551-XXXX [insert new helpdesk #]. Voicemail messages should include the name of the matter, the Administrative Proceeding File Number (3-#####), and your contact information. OS is available to answer any procedural questions or refer you to applicable Rules of Practice; however, we cannot answer legal questions, or interpret orders of the Commission or hearing officer.

### **Attachments**

- Attachment A:** Sample Index of Attachments (Motions/Briefs)
- Attachment B:** Sample Divider Page for Attachments (Motions/Briefs)
- Attachment C:** Sample Notice of Manual Filing
- Attachment D:** Sample Index of Hearing Exhibits
- Attachment E:** Sample Divider Page for Hearing Exhibits

**Attachment A: Sample Index of Attachments (Motions/Briefs)**

**UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION**

**ADMINISTRATIVE PROCEEDING  
File No. 3-#####**

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**In the Matter of**  
  
**XYZ, Inc.,**  
  
**Respondent.**  
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**XYZ's INDEX OF ATTACHMENTS**

<b><u>Attachment</u></b>	<b><u>Description</u></b>
A	Affidavit of John Doe
B	Excerpts from Jane Doe's Deposition
C	Contract Between XYZ Company and ABC Company (Pages 1-35)
D	XYZ Company General Ledgers

**Attachment B: Sample Divider Page for Attachments (Motions/Briefs)**

**XYZ Attachment 1**

**DRAFT**

**Attachment C: Sample Notice of Manual Filing**

**UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION**

**ADMINISTRATIVE PROCEEDING**

**File No. 3-#####**

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**In the Matter of**

**XYZ, Inc.,**

**Respondent.**

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**XYZ's NOTICE OF MANUAL FILING**

Please take notice that XYZ has manually filed the following document(s) by delivering to the Office of the Secretary the documents on [identify the alternative electronic media (*e.g.*, a CD)]: [List document(s)].

XYZ makes this manner of filing because [state reason(s) for departure from procedures (*e.g.*, the document(s) cannot be authentically converted to PDF format/the document exceeds the data size limits for electronic filing/the hearing officer/Commission requested the alternative format because it will aid in the review of the materials)].

The [electronic media] containing the document(s) and a hard copy of this Notice have been served on all parties of record.

[Date]

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Name of Filer

Firm Name (if applicable)

Street Address

City, State, Zip Code

Telephone Number

Email Address

**Attachment D: Sample Index of Hearing Exhibits**

**UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION**

**ADMINISTRATIVE PROCEEDING  
File No. 3-#####**

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**In the Matter of  
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**XYZ'S INDEX OF HEARING EXHIBITS**

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**Attachment E: Sample Divider Page for Hearing Exhibits**

**XYZ EX 1**

**DRAFT**