

18-02124-E

January 25 2018

US Securities & Exchange Commission  
Office of FOIA and Privacy Act Operations  
100 F Street, NE Mail Stop 5100  
Washington, DC 20549-5100



Dear FOIA Office:

Under the Freedom of Information Act (FOIA), please send a copy of the following:

**A copy of: Exhibit: 2.1 to the form 8-K filed by PHARMOS CORP on March 15, 2006**

In the event confidential treatment has not expired provide the specific date for which

confidential treatment is still in effect. I do not need a copy of the order. We authorize up to

\$61.00 in processing fees. Thank You,

Paul D'Souza  
Editor - Deals

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UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
STATION PLACE  
100 F STREET, NE  
WASHINGTON, DC 20549-2465

Office of FOIA Services

January 29, 2018

Mr. Paul D'Souza  
Clarivate Analytics  
160 Blackfriars Road  
London, SE18EZ  
United Kingdom

Re: Freedom of Information Act (FOIA), 5 U.S.C. § 552  
Request No. 18-02124-E

Dear Mr. D'Souza:

This letter is in response to your request, dated and received in this office on January 25, 2018, for access to Exhibit 2.1 to the Form 8-K filed by Pharmos Corp., on March 15, 2006.

Based on the information you provided in your letter, we conducted a thorough search of the SEC's various systems of records, but did not locate or identify any information responsive to your request.

Pharmos Corp did not submit an application for confidential treatment for Exhibit 2.1 to the Form 8-K filed on March 15, 2006. Consequently, the publicly filed redacted version of the request exhibit is the only available version, and it can be found on the SEC's website. To view and retrieve the exhibit from the SEC's website, please go to [www.sec.gov](http://www.sec.gov) and select "Company Filings Search" under "Filings."

If you consider this response to be an adverse determination for any reason, you have the right to appeal the adequacy of our search or finding of no responsive information to the SEC's General Counsel under 5 U.S.C. § 552(a)(6), 17 CFR § 200.80(d)(5)(iv). The appeal must be received within ninety (90) calendar days of the date of this adverse decision. Your appeal must be in writing, clearly marked "Freedom of Information Act Appeal," and should identify the requested records. The appeal may include facts and authorities you consider appropriate.

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You may file your appeal by completing the online Appeal form located at [https://www.sec.gov/forms/request\\_appeal](https://www.sec.gov/forms/request_appeal), or mail your appeal to the Office of FOIA Services of the Securities and Exchange Commission located at Station Place, 100 F Street NE, Mail Stop 2465, Washington, D.C. 20549, or deliver it to Room 1120 at that address. Also, send a copy to the SEC Office of the General Counsel, Mail Stop 9612, or deliver it to Room 1120 at the Station Place address.

If you have any questions, please contact me at [osbornes@sec.gov](mailto:osbornes@sec.gov) or (202) 551-8371. You may also contact me at [foiapa@sec.gov](mailto:foiapa@sec.gov) or (202) 551-7900. You also have the right to seek assistance from Ray J. McInerney at (202) 551-7900 as a FOIA Public Liaison for this office, or contact the Office of Government Information Services (OGIS) for dispute resolution services. OGIS can be reached at 1-877-684-6448 or [Archives.gov](http://Archives.gov) or via e-mail at [ogis@nara.gov](mailto:ogis@nara.gov).

Sincerely,



Sonja Osborne  
FOIA Lead Research Specialist