UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
CORPORATION FINANCE

April 25, 2023

Kenneth M. Silverman
Olshan Frome Wolosky LLP

Re: GameStop Corp. (the "Company")
Incoming letter dated February 6, 2023

Dear Kenneth M. Silverman:

This letter is in response to your correspondence concerning the shareholder proposal (the "Proposal") submitted to the Company by Roth Chance for inclusion in the Company's proxy materials for its upcoming annual meeting of security holders.

The Proposal requests that the board assess a spin-off of GME Entertainment into a fully independent, publicly traded company and issuance of non-fungible tokenized shares of ownership as a dividend to shareholders, with these non-fungible tokenized shares being tradeable on the GameStop Marketplace and eligible to be held non-custodially in the GameStop Wallet.

There appears to be some basis for your view that the Company may exclude the Proposal under Rule 14a-8(i)(7). In our view, the Proposal relates to, and does not transcend, ordinary business matters. Accordingly, we will not recommend enforcement action to the Commission if the Company omits the Proposal from its proxy materials in reliance on Rule 14a-8(i)(7). In reaching this position, we have not found it necessary to address the alternative bases for omission upon which the Company relies.

Copies of all of the correspondence on which this response is based will be made available on our website at https://www.sec.gov/corpfin/2022-2023-shareholder-proposals-no-action.

Sincerely,

Rule 14a-8 Review Team

cc: Roth Chance

OLSHAN

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February 6, 2023

VIA E-MAIL

Office of Chief Counsel
Division of Corporation Finance
Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549

Re: *GameStop Corp.*
Stockholder Proposal of Roth Chance
Securities Exchange Act of 1934 ("Exchange Act") — Rule 14a-8

Ladies and Gentlemen:

This letter is to inform you that our client, GameStop Corp. (the "Company"), intends to omit from its proxy statement and form of proxy for its 2023 Annual Meeting of Stockholders (collectively, the "2023 Proxy Materials") a stockholder proposal and statement in support thereof (the "Proposal") received from Roth Chance (the "Proponent"). A copy of the Proposal, together with the Proponent's cover letter, is attached to this letter as Exhibit A.

Pursuant to Rule 14a-8(j), we have:

- filed this letter with the Securities and Exchange Commission (the "Commission") no later than eighty (80) calendar days before the date on which the Company intends to file its definitive 2023 Proxy Materials with the Commission; and

- concurrently sent a copy of this correspondence to the Proponent.

Rule 14a-8(k) and Staff Legal Bulletin No. 14D (Nov. 7, 2008) ("SLB 14D") provide that stockholder proponents are required to send companies a copy of any correspondence that the proponents elect to submit to the Commission or the staff of the Division of Corporation Finance (the "Staff"). Accordingly, we are taking this opportunity to inform the Proponent that if the Proponent elects to submit additional correspondence to the Commission or the Staff with respect to the Proposal, a copy of that correspondence should be furnished concurrently to the undersigned on behalf of the Company pursuant to Rule 14a-8(k) and SLB 14D.

THE PROPOSAL

The Company received the below Proposal from the Proponent, which states in relevant part as follows:

The Marketplace offers an unprecedented opportunity for growth on all time horizons. With exploding interest in Web3 and quasi-competitors achieving market capitalizations in the double-digit billions, it is evident that the board should consider a spin-off of the GME Entertainment property. I propose that the board should assess a spin-off of GME Entertainment into a fully independent, publicly traded company and issuance of non-fungible tokenized shares of ownership as a dividend to GameStop shareholders, with these non-fungible tokenized shares being tradeable on the GameStop Marketplace and eligible to be held non-custodially in the GameStop Wallet.

Traffic and quality products are what the Marketplace needs to grow. A spin-off of GME Entertainment presents an opportunity to bring a substantial number of users into the GameStop ecosystem. This will increase traffic and allow GME Entertainment to further leverage third party partnerships and drive increased interest in future partnerships, resulting in more high-quality goods on the marketplace. A spin-off of GME Entertainment benefits GameStop by strengthening its balance sheet and it can use any funds raised from the spin-off to focus on more aggressive growth strategies for retail stores.

BASES FOR EXCLUSION

The Company respectfully requests the Staff's concurrence that the Company may exclude the Proposal from its 2023 Proxy Materials in reliance on:

- Rule 14a-8(i)(7) because the Proposal deals with a matter relating to the Company's ordinary business operations;
- Rule 14a-8(i)(5) because the Proposal relates to operations accounting for less than 5% of the Company's total assets at the end of the Company's most recent fiscal year for which audited financial statements are available ("the most recent fiscal year"), and for less than 5% of its net earnings and gross sales for the most recent fiscal year, and is not otherwise significantly related to the Company's business; and
- Rule 14a-8(i)(3) because it is impermissibly vague and indefinite in violation of Rule 14a-9 under the Exchange Act.

ANALYSIS

I. The Proposal May Be Excluded from the Company's 2023 Proxy Materials Pursuant to Rule 14a-8(i)(7) Because It Relates to the Company's Ordinary Business Operations.

Rule 14a-8(i)(7) permits a company to exclude a stockholder proposal if the proposal "deals with a matter relating to the company's ordinary business operations." The underlying policy of the ordinary business exclusion is "to confine the resolution of ordinary business problems to management and the board of directors, since it is impracticable for shareholders to

decide how to solve such problems at an annual shareholders meeting." SEC Release No. 34-40018 (May 21, 1998) (the "1998 Release"). As set out in the 1998 Release, there are two "central considerations" underlying the ordinary business exclusion. One consideration is that "[c]ertain tasks are so fundamental to management's ability to run a company on a day-to-day basis that they could not, as a practical matter, be subject to direct shareholder oversight." The other consideration is that a proposal should not "seek[] to 'micro-manage' the company by probing too deeply into matters of a complex nature upon which shareholders, as a group, would not be in a position to make an informed judgment." The Proposal implicates both of these considerations.

The Proposal may be excluded pursuant to Rule 14a-8(i)(7) because it relates to the manner in which the Company offers its products and services. Whether to offer a product or service is a decision core to the Company's business, is the responsibility of many individuals across the Company and is fundamental to management's ability to run the Company. These decisions involve a broad range of business considerations, such as anticipated expenditures, demand in domestic and international markets, competitor activity, consumer appeal, brand imaging, diversion of management time and effort, contractual obligations, and timing. None of these considerations, let alone the interaction among them, is appropriate for direct oversight by stockholders, who lack the requisite day-to-day familiarity with the business. Were such decisions subject to direct stockholder oversight, the Company would be significantly hindered in its day-to-day operations.

In addition to interfering with management's day-to-day operations, the Proposal also seeks to "micro-manage" the Company. Specifically, the Proposal appears to instruct the Company, on the one hand, to create a fully independent, publicly traded GME Entertainment LLC ("GME Entertainment") entity, which would acquire the Company's existing non-fungible token ("NFT") business operations and be subject to its own obligations to comply with the Commission's rules and regulations and seek separate listing on a stock exchange, and on the other hand, to continue its operation of the GameStop Wallet and GameStop NFT Marketplace, and allow certain NFTs to be tradeable on the GameStop NFT Marketplace. Determinations about how and when to expand or dispose of certain product offerings are inherently complex, and stockholders as a group are not in an appropriate position to make informed decisions on such matters. In particular, decisions as to whether to effect a spin-off of a subsidiary, and which business operations to include in a spin off, rest squarely with the board of directors of a corporation under Delaware law.

Pursuant to Rule 14a-8(i)(7), the Staff has consistently granted no-action relief for stockholder proposals, such as the Proposal, that relate to the day-to-day operations of a company, specifically when the proposal relates to the products and services offered for sale by the company. For example, see *PayPal Holdings, Inc.* (Apr. 2, 2021) (in which the Staff concurred in exclusion of a proposal asking that the board take steps to insure that PayPal users are given "specific, good and substantial reasons" for any frozen account or service termination); *Nike, Inc.* (Jun. 19, 2020) (in which the Staff concurred in exclusion of a proposal requesting the company to research "the market potential of creating a shoe and apparel line of products, that is geared to the needs and wants of the over 40 years of age customers, that were athletes or wan-a be athletes" and suggesting that the company launch this line under a "consumer direct"

marketing approach incorporating the theme of "STILL DOING IT"); *McDonald's Corporation* (Mar. 12, 2019) (in which the Staff concurred in exclusion of a proposal requesting the formation of a special board committee on food integrity to carry out duties specified in the proposal in an effort to restore public confidence in the company's food quality and integrity, on the basis that the proposal related to "the products and services offered for sale by the Company"); *Verizon Communications Inc.* (Jan. 29, 2019) (in which the Staff concurred in exclusion of a proposal asking the company to offer company stockholders the same discounted pricing on company products and services as is offered to company employees, on the basis that the proposal related to "the Company's discount pricing policies"); *The Home Depot, Inc.* (Mar. 21, 2018) (in which the Staff concurred in exclusion of a proposal requesting that the company end its sale of glue traps, on the basis that the proposal related to "the products and services offered for sale by the Company"); *Cabelas Incorporated* (Apr. 7, 2016) (in which the Staff concurred in exclusion of a proposal asking the board to adopt a policy specifying the types of weapons the company could sell, on the basis that the proposal related to the "products and services offered for sale by the company"); *The Walt Disney Company* (Nov. 23, 2015) (in which the Staff concurred in exclusion of a proposal asking the board to approve the release of the film Song of the South on Blu-ray in 2016 for its 70th anniversary, on the basis that the proposal related to the "products and services offered for sale by the company"); *Papa John's International, Inc.* (Feb. 13, 2015) (in which the Staff concurred in exclusion of a proposal requesting that the company expand its menu offerings to include vegan cheeses and vegan meats, on the basis that the proposal related to "the products offered for sale by the company and does not focus on a significant policy issue"); and *Telular Corporation* (Dec. 5, 2003) (excluding a proposal to appoint a board committee to explore strategic alternatives to maximize stockholder value appeared to relate in part to non-extraordinary transactions).

The Proposal also does not involve a significant policy issue. As set out in the 1998 Release, proposals "focusing on sufficiently significant social policy issues (e.g., significant discrimination matters) generally would not be considered to be excludable [under Rule 14a-8(i)(7)], because the proposals would transcend the day-to-day business matters and raise policy issues so significant that it would be appropriate for a shareholder vote." Accordingly, and as is appropriate, an issue must meet certain standards to be deemed a significant policy issue. In determining whether an issue should be deemed a significant policy issue, the Staff considers whether the issue has been the subject of widespread and/or sustained public debate. The issue of whether the Company should effect a spin-off of GME Entertainment into a fully independent, publicly traded company and, as part of such spin-off, issue NFT shares of ownership to the Company's stockholders, does not meet this standard, as the Company is not aware of any widespread or sustained public debate regarding this issue.

As in the above-cited letters, the Proposal addresses the ordinary business matter of the products and services offered for sale by the Company and in no way suggests that it relates to any underlying significant policy issue. The Proposal involves precisely the type of matter that is consistently deemed excludable under Rule 14a-8(i)(7) and which this exclusion is intended to address. Accordingly, because the Proposal involves the type of day-to-day operational oversight of the Company's business that the ordinary business exclusion in Rule 14a-8(i)(7) was meant to address, the Proposal should be deemed excludable pursuant to Rule 14a8(i)(7), consistent with the above-cited no-action letters.

II. The Proposal May Be Excluded from the Company's 2023 Proxy Materials Pursuant to Rule 14a-8(i)(5) Because It Relates to Operations Which Account for Less Than 5% of the Company's Total Assets at the End of Its Most Recent Fiscal Year, and for Less Than 5% of Its Net Earnings and Gross Sales for Its Most Recent Fiscal Year, and Is Not Otherwise Significantly Related to the Company's Business.

Rule 14a-8(i)(5) permits a company to exclude a proposal that "relates to operations which account for less than five percent of the company's total assets at the end of its most recent fiscal year, and for less than five percent of its net earnings and gross sales for its most recent fiscal year, and is not otherwise significantly related to the company's business." The Commission has stated that, "For example, the proponent could provide information that indicates that while a particular corporate policy which involves an arguably economically insignificant portion of an issuer's business, the policy may have a significant impact on other segments of the issuer's business or subject the issuer to significant contingent liabilities." SEC Release No. 34-19135 (Oct. 14, 1982).

The Company acknowledges the Staff's recent change in approach with respect to requests to exclude proposals pursuant to Rule 14a-8(i)(5). In Staff Legal Bulletin No. 14L (Nov. 3, 2021) ("SLB 14L"), the Staff stated that "proposals that raise issues of broad social or ethical concern related to the company's business may not be excluded, even if the relevant business falls below the economic thresholds of Rule 14a-8(i)(5)." The Staff, however, also confirmed that it is "returning to [its] longstanding approach, prior to SLB No. 14I" and that it would apply analysis consistent with the court's ruling in *Lovenheim v. Iroquois Brands, Ltd.*, 618 F. Supp. 554 (D.D.C. 1985), which stated that a proposal that is "ethically significant in the abstract but ha[s] no meaningful relationship to a [company's] business" may be excluded under Rule 14a-8(i)(5)). The Company believes that excluding the Proposal would be consistent with the Staff's current approach as the operations subject to the Proposal are *de minimis* and do not otherwise raise issues of broad social or ethical concern.

Here, the Proposal relates to operations that are *de minimis* to the Company and, in terms of total assets, net earnings, and gross sales, account for less than Rule 14a-8(i)(5)'s five percent threshold and, moreover, does not raise any issues of broad social or ethical concern. The Company represents that, as of and for the fiscal year ended January 29, 2022, the most recent date for which audited financial information is available, the Company's GME Entertainment subsidiary and related digital asset operations, including the GameStop NFT Marketplace and GameStop Digital Wallet accounted for less than 3% of the Company's total assets, less than 1% of the Company's total net losses and none of the Company's total gross sales. Even if the Staff determines that the Proposal raises a significant social policy issue, it is simply not meaningfully related to the Company's business; as noted above, the Proposal relates to operations that are not economically or otherwise significant to the Company. Allowing exclusion of the Proposal would be consistent with the court's holding in *Lovenheim* and, accordingly, with the Staff's approach explained by SLB 14L, as well as the no-action letter precedent issued prior to the SLBs rescinded by SLB 14L.

III. The Proposal May Be Excluded from the Company's 2023 Proxy Materials Pursuant to Rule 14a-8(i)(3) Because It Is Impermissibly Vague and Indefinite in Violation of Rule 14a-9 Under the Exchange Act.

Rule 14a-8(i)(3) provides that a company may exclude a stockholder proposal from its proxy materials if the proposal or supporting statement is contrary to any of the Commission's proxy rules. The Staff has consistently taken the position that vague and indefinite stockholder proposals are inherently misleading and therefore excludable under Rule 14a-8(i)(3) because "neither the shareholders voting on the proposal, nor the company in implementing the proposal (if adopted), would be able to determine with any reasonable certainty exactly what actions or measures the proposal requires." Staff Legal Bulletin No. 14B (September 15, 2004).

The Staff has further explained that a stockholder proposal can be sufficiently misleading and therefore excludable under Rule 14a-8(i)(3) when the company and its stockholders might interpret the proposal differently such that "any action ultimately taken by the [c]ompany upon implementation [of the proposal] could be significantly different from the actions envisioned by the shareholders voting on the proposal." *Fuqua Industries, Inc.* (Mar. 12, 1991). Such stockholder disagreement would further complicate the task of the board in taking action to implement a proposal.

The Staff has, on many occasions, allowed the exclusion as vague and indefinite of proposals requesting certain actions but containing only general or uninformative references regarding the steps to be taken, or a set of general standards, principles or criteria that lack a precise definition or ascertainable scope. For example, see *Microsoft Corp.* (Oct. 7, 2016) (concurring in the exclusion of a stockholder proposal under Rule 14a-8(i)(3) where the proposal requested that the board make a determination that there is a "compelling justification" before taking any action preventing "the effectiveness of a shareholder vote"); *Yahoo! Inc*. (Mar. 26, 2008) (concurring with the exclusion under Rule 14a-8(i)(3) of a proposal requesting that the board establish "a new policy doing business in China, with the help from China's democratic activists and human/civil rights movement"); *Bank of America Corp.* (Jun. 18, 2007) (concurring with the exclusion under Rule 14a-8(i)(3) of a proposal requesting that the board compile a report "concerning the thinking of the [d]irectors concerning representative payees"); *Kroger Co.* (Mar. 19, 2004) (concurring with the exclusion under Rule 14a-8(i)(3) of a proposal requesting that the company prepare a sustainability report based on the Global Reporting Initiative's sustainability reporting guidelines, where the company argued that the proposal's "extremely brief and basic description of the voluminous and highly complex Guidelines" did not adequately inform the company of the actions necessary to implement the proposal).

The courts have also ruled on cases involving similar proposals, finding that "shareholders are entitled to know precisely the breadth of the proposal on which they are asked to vote" and that a proposal should be excluded when "it [would be] impossible for the board of directors or the stockholders at large to comprehend precisely what the proposal would entail." *New York City Employees' Retirement System v. Brunswick Corp.*, 789 F. Supp. 144, 146 (S.D.N.Y. 1992); *Dyer v. SEC*, 287 F.2d 773, 781 (8th Cir. 1961).

Under these standards, the Proposal is excludable under Rule 14a-8(i)(3) because its ambiguous and inconsistent language provides for alternative interpretations but fails to provide any guidance as to how the ambiguities should be resolved. The Proposal uses terms such as "Marketplace," "GameStop Marketplace," "GME Entertainment," "GameStop Wallet" "GameStop ecosystem" and "non-fungible token" in a contradictory and ambiguous manner. On the one hand, the Proposal states that the Company should spin off GME Entertainment, the subsidiary through which the Company operates its digital asset business, and divest itself of the digital asset business. On the other hand, the Proposal indicates that Company should allow the non-fungible tokenized shares to be tradeable on the GameStop Marketplace and held in the GameStop Wallet and that the spin-off would grow the GameStop ecosystem, which suggests that GameStop should continue to operate its digital asset business after the spin-off. In addition, the Proposal suggests that Company can "use any funds raised from the spin off to focus on more aggressive growth strategies for retail stores." This statement suggests that Proponent is requesting the Company to conduct an asset sale as opposed to a spin-off transaction. A spin-off in the form of a dividend would not produce funds for the Company. Further, the Proposal discusses "non-fungible tokenized shares of ownership." This could be interpreted by a stockholder as an issuance of non-fungible tokens or of governance tokens.

Therefore, stockholders would not know whether the Proposal is advocating (1) the spin-off of GME Entertainment and all of the Company's digital asset related business, (2) a spin-off of GME Entertainment with the Company continuing to operate its own GameStop NFT Marketplace and GameStop Wallet, or (3) a sale transaction involving GME Entertainment in which the Company either divests itself completely of the digital asset business or continues to operate a part of the digital asset business. Further, stockholders would not know whether the Proposal is advocating for (1) an issuance of non-fungible tokens or (2) governance tokens of the newly spun-off GME Entertainment.

With these ambiguities, the Company itself would face significant uncertainty in seeking to implement the Proposal if the Proposal were to be adopted. The Company would either have to explore the total divesture of its digital asset business or attempt to divest itself of its subsidiary and continue to operate the remainder of its digital asset business. Further, the Company would have to determine whether the Proposal is requesting non-fungible tokens or governance tokens, and discern how to navigate the myriad issues of compliance with either dividend. Thus, due to the internal inconsistencies in the Proposal, the Company cannot "determine with any reasonable certainty exactly what actions or measures the [P]roposal requires," see Staff Legal Bulletin No. 14B (Sept. 15, 2004) ("SLB 14B"), and the Company's implementation of the Proposal "could be significantly different from the actions envisioned by [stockholders] voting on the [P]roposal," see *Fuqua Industries, Inc.* (avail. Mar. 12, 1991).

The Staff consistently has concurred that proposals are excludable under Rule 14a-8(i)(3) when vague and inconsistent language in the proposal references alternative standards, such that neither stockholders nor the company would be able to determine with any reasonable certainty exactly what actions or measures the proposal required. For example, in *Verizon Communications Inc.* (avail. Feb. 21, 2008), the Staff concurred with the exclusion of a proposal attempting to set formulas for short- and long-term incentive-based executive compensation where the company argued that because the methods of calculation were inconsistent with each

other, it could not determine with any certainty how to implement the proposal. See also *Prudential Financial Inc.* (avail. Feb. 16, 2007) (concurring with the exclusion of a proposal requiring stockholder approval for certain senior management incentive compensation programs because the proposal contained key terms and phrases that were susceptible to differing interpretations); *Safescript Pharmacies, Inc.* (avail. Feb. 27, 2004) (concurring with the exclusion of a proposal that requested that all stock options granted by the company be expensed in accordance with Financial Accounting Standards Board guidelines, where following such guidelines "expressly allows the [c]ompany to adopt either of two different methods of expensing stock-based compensation"); *Northrop Corp.* (avail. Mar. 2, 1990) (concurring with the exclusion of a proposal that requested the immediate appointment of a director but provided no guidance as to which particular appointment method would be required out of those that were legally permissible). As with the precedent cited above, due to the Proposal's vague and inconsistent use of the terms and conflicting demands of the Proposal, "neither the stockholders voting on the [P]roposal, nor the [C]ompany in implementing the [P]roposal (if adopted), would be able to determine with any reasonable certainty exactly what actions or measures the [P]roposal requires." SLB 14B. Accordingly, as a result of the vague and indefinite nature of the Proposal, and consistent with Staff precedent, the Proposal is impermissibly misleading and, therefore, excludable in its entirety under Rule 14a-8(i)(3).

CONCLUSION

Based upon the foregoing analysis, we respectfully request that the Staff concur that it will take no action if the Company excludes the Proposal from its 2023 Proxy Materials.

We would be happy to provide you with any additional information and answer any questions that you may have regarding this subject. Correspondence regarding this letter should be sent to shareholderproposals@olshanlaw.com. If we can be of any further assistance in this matter, please do not hesitate to call me at (212) 451-2327.

Sincerely,

/s/ Kenneth M. Silverman

Kenneth M. Silverman

Enclosures

cc: Mark Robinson, General Counsel and Secretary, GameStop Corp.
Roth Chance

Exhibit A

December 12, 2022

GameStop Corp.
625 Westport Parkway
Grapevine, TX 76051

Members of the Board,

My name is Roth Chance, and I would like to submit a shareholder proposal for the 2023 annual shareholder meeting. I am an individual investor with directly registered ownership of roughly 0.00047% of GameStop's outstanding shares. I intend to hold these shares through the date of the 2023 annual shareholder meeting. I would be happy to meet with the board (or other representative) to discuss this proposal at any time.

The past two years have been an incredible journey for GameStop (the Company), and likewise, its shareholders. The Company's turnaround has required monumentous effort from the entire GameStop team, and I offer my most sincere thanks and congratulations to all those that have contributed towards its success. The Company has been given a solid foundation and is positioned to achieve stellar growth with excellent leadership at the helm. I am happy with the direction GameStop is headed, but there is still work to be done to unlock value trapped in underperforming shares.

The Marketplace offers an unprecedented opportunity for growth on all time horizons. With exploding interest in Web3 and quasi-competitors achieving market capitalizations in the double-digit billions, it is evident that the board should consider a spin-off of the GME Entertainment property. I propose that the board should assess a spin-off of GME Entertainment into a fully independent, publicly traded company and issuance of non-fungible tokenized shares of ownership as a dividend to GameStop shareholders, with these non-fungible tokenized shares being tradeable on the GameStop Marketplace and eligible to be held non-custodially in the GameStop Wallet.

Traffic and quality products are what the Marketplace needs to grow. A spin-off of GME Entertainment presents an opportunity to bring a substantial number of users into the GameStop ecosystem. This will increase traffic and allow GME Entertainment to further leverage third party partnerships and drive increased interest in future partnerships, resulting in more high-quality goods on the marketplace. A spin-off of GME Entertainment benefits GameStop by strengthening its balance sheet and it can use any funds raised from the spin-off to focus on more aggressive growth strategies for retail stores.

Investors in GameStop during the turnaround period have had to put forth significant effort and tremendous commitment to the long-term vision of the Company's future and should be rewarded for the tailwinds they provided throughout the process. The board has a chance to compensate shareholders for their efforts while also providing real benefit to the company by spinning off GME Entertainment and issuing shares of ownership as an NFT dividend. I am thankful for the board's leadership and trust whatever decision is made will be to the benefit of the long-term health of the Company.

Thank you for your time.

Kind Regards,

Roth Chance

GameStop Corp
Attn: Members of the Board
re: shareholder proposal
625 Westport Pkwy
Grapevine, TX 76051

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TO ATTN. MEMBER OF THE BOARD
GAMESTOP CORP.
625 WESTPORT PKWY.

GRAPEVINE TX 76051
(000) 000-0000 REF:
INV:
PO: DEPT:

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