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## D.C. Circuit Reaffirms the Protections of *Upjohn* in the Context of Corporate Internal Investigations

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On June 27, 2014, the United States Court of Appeals for the District of Columbia Circuit, on mandamus, held in *In re Kellogg Brown & Root, Inc.* that the district court too narrowly circumscribed the protections afforded to a corporation by the attorney-client privilege, as articulated in *Upjohn Co. v. United States*. In doing so, the court provided clarity and comfort to companies following the district court's controversial decision, which, as noted by amici to this case, had the potential to "work a sea change in the well-settled rules governing internal corporate investigations."

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