SEC Staff Issues Clarifying Interpretations Regarding Recent Filing Deadline Extensions Related to COVID-19

Date: 04/03/20

On March 25, 2020, the Securities and Exchange Commission (the "SEC") issued Order No. 34-88465 (the "Order"), which extended the deadlines for certain filings by reporting companies where the companies' inability to timely file is due to circumstances related to the continuing COVID-19 pandemic. We previously summarized the Order in our March 30, 2020 memorandum, available here. On March 31, 2020, the staff of the SEC's Division of Corporation Finance published two compliance and disclosure interpretations ("C&DIs") regarding the Order and its relationship to Rule 12b-25 under the Securities Exchange Act of 1934, as amended.

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