
SEC Reopens Comment Period on 2016 Universal Proxy Proposal

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In October 2016, the Securities and Exchange Commission (the “SEC”) proposed amendments to the federal proxy rules that would impose mandatory use of a universal proxy card in election contests and would require each proxy card to include the names of all nominees named in any proxy statement (the “Proposing Release”). Our November 2016 memorandum discussing the Proposing Release can be found [here](#). On April 16, 2021, the SEC reopened the comment period on the Proposing Release until June 7, 2021 and also raised additional questions for comment (the “Reopening Release”). This memorandum summarizes the Proposing Release and highlights certain of the questions raised for comment in the Proposing Release and the Reopening Release.

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