

## Insights

# CITING COVID-19 CONCERNS, FTC SUSPENDS EARLY TERMINATION AND TEMPORARILY INSTITUTES E-FILING SYSTEM

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In light of the developing COVID-19 pandemic, the Federal Trade Commission's Premerger Notification Office ( "PNO") has announced temporary changes for submitting premerger filings under the Hart-Scott Rodino ("HSR") Antitrust Improvements Act of 1976, as amended.

Beginning Tuesday, March 17, 2020 and for the duration of the emergency, the PNO and Antitrust Division of the Department of Justice ("DOJ") will **only** accept HSR filings via a new e-filing system. Hard copy or DVD submissions will not be accepted, although parties may be required to submit hard copies or DVDs of e-filings once normal agency operations resume.

Further, while the PNO and DOJ review of HSR filings will continue as normal, the PNO will **not** be granting early termination of any HSR waiting period during the use of the temporary e-filing system. The early terminations granted on Friday, March 13, 2020 will be the last granted for the duration of the emergency. Parties with HSR filings currently under review, or parties intending to file in the coming weeks, should take this timing into account when planning for closing. Filing parties might also wish to consider building in additional time for the HSR filing process as the FTC works to implement the new temporary system.

## RELATED CAPABILITIES

- Antitrust
- Corporate
- Finance

## MEET THE TEAM



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