
From: Halperin, Alan S [REDACTED]
Sent: Saturday, September 19, 2015 5:08 PM
To: jeffrey E.
Subject: Re:

Neither the funding, nor the annuity nor the pour over to the remainder should be a buy or sell. But a swap would be.
Alan S. Halperin | Partner Paul, Weiss, Rifkind, Wharton & Garrison =LP
1285 Avenue of the Americas | New York, NY 10019-6064

[REDACTED] | www.paulweiss.com

From: jeffrey E.
Sent: Saturday, September 19, 2015 1:06 PM
To: Halperin, Alan S
Subject: Re:

The payment to remainder man the same?

On Saturday, 19 September 2015, Halperin, Alan S [REDACTED]
wrote:

Hi Jeff. We have concluded that the annuity payment is not a buy. I am happy to discuss. Alan

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From: jeffrey E.
Sent: Saturday, September 19, 2015 11:55 AM
To: Halperin, Alan S
Subject:

should not be cognizant that the new annuity will be considered a buy for 16b purposes. ?

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