

UPDATE: Broadridge Reverses Announced Change Regarding Interim Vote Tallies in Proxy Contests

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Last Thursday, Broadridge announced that it will change its procedures for reporting of interim voting results for proxy contests, so that each soliciting party will only receive the results pertaining to its own solicitation. We discussed this [here](#).

However, upon further internal review, Broadridge has now decided that it will not be implementing those changes. Both sides of a proxy contest will continue to receive interim voting updates for their own and each other's ballot. In its notice, Broadridge indicated that these procedures have been consistently applied for decades and are understood by regulators and participants in the proxy process. The firm is also proactively reaching out to its nominee clients to remind them of these procedures, as well as the SEC and FINRA.

If you have any questions regarding the matters covered in this publication, please reach out to any of the lawyers listed below or your usual Davis Polk contact.

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