



November 1, 2012

VIA ELECTRONIC MAIL AND U.S. MAIL

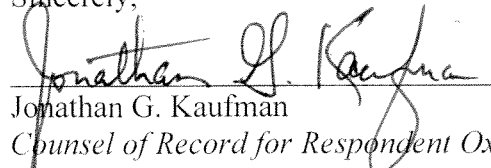
Ms. Elizabeth Murphy
Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549

Re: *Matter of the Motion of American Petroleum Institute et al. for Stay of Rule 13q-1 and Related Amendments to New Form SD*, File No. S7-42-10

Dear Ms. Murphy,

Please find enclosed for filing in the above-captioned action an original and three copies of the Response of Oxfam America to Motion for Stay of Rule 13q-1 and Related Amendments to New Form SD, including a Notice of Appearance, a Certificate of Compliance with Word Limit, and the Declaration of Paul O'Brien, attached as Annex A.

Sincerely,


Jonathan G. Kaufman
Counsel of Record for Respondent Oxfam America

Attachments

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