

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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AMERICAN PETROLEUM INSTITUTE,	)	
CHAMBER OF COMMERCE OF THE	)	
UNITED STATES OF AMERICA,	)	
INDEPENDENT PETROLEUM	)	
ASSOCIATION OF AMERICA, and	)	
NATIONAL FOREIGN TRADE COUNCIL	)	Civ. Action No. 12-1668
	)	(JDB)
Plaintiffs,	)	
	)	
v.	)	
	)	
SECURITIES AND EXCHANGE	)	
COMMISSION,	)	
	)	
Defendant.	)	

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**RESPONSE OF DEFENDANT SECURITIES AND EXCHANGE  
COMMISSION REGARDING THE COURT’S  
ORDER DIRECTING THE PARTIES TO STATE THEIR VIEWS  
ON OXFAM AMERICA, INC.’S REQUEST TO INTERVENE**

Pursuant to this Court’s order of May 7, 2013, directing the parties to “notify the Court of any opposition to Oxfam America, Inc.’s motion to intervene, either as to the fact of intervention or the terms of intervention, including Oxfam America’s possible request to file supplemental briefing,” the Commission states as follows:

1. The Commission consents to Oxfam America's intervention in this case. However, the Commission does not believe that supplemental briefing is warranted for the reasons set forth in the parties Joint Motion to Expedite (Docket # 21).

2. If this Court should permit supplemental briefing for any party, the Commission respectfully requests that it be permitted to file a responsive supplemental brief of comparable length.

Respectfully Submitted,

MICHAEL A. CONLEY  
Deputy General Counsel

WILLIAM K. SHIREY  
Senior Litigation Counsel

THEODORE J. WEIMAN  
Attorney

/s/ William K. Shirey  
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(202) 551-5043 (Shirey)

May 2013

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia by using the CM/ECF system on May 10, 2013. Notice of this filing will be sent by e-mail to all parties by operation of the Court's CM/ECF system.

/s/ William K. Shirey  
William K. Shirey

May 10, 2013