



Conflict Minerals Update: Court of Appeals Denies Motion to Stay Rule

May 15, 2014

Yesterday, the United States Court of Appeals for the District of Columbia Circuit denied the emergency motion filed by the National Association of Manufacturers and other business organizations to stay the SEC's conflict minerals rule in its entirety, pending the resolution of the litigation regarding the rule.¹ Accordingly, issuers subject to the rule must prepare their Forms SD in accordance with the SEC's guidance of April 29, 2014 and file them with the SEC no later than the June 2, 2014 deadline.

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If you have any questions or would like additional information, please do not hesitate to contact [Yafit Cohn](mailto:yafit.cohn@stblaw.com) at (212) 455-3815 or yafit.cohn@stblaw.com or [Arjun Koshal](mailto:arjun.koshal@stblaw.com) at (212) 455-3379 or akoshal@stblaw.com, or any other member of the Firm's Public Company Advisory Practice.

This memorandum is for general information purposes and should not be regarded as legal advice. Please contact your relationship partner if we can be of assistance regarding these important developments. The names and office locations of all of our partners, as well as our recent memoranda, can be obtained from our website, www.simpsonthacher.com.

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¹ See Memorandum of Simpson Thacher & Bartlett LLP, "Court of Appeals Invalidates Part of SEC's Conflict Minerals Rule; SEC to Implement the Remainder of the Rule" (Apr. 30, 2014); Memorandum of Simpson Thacher & Bartlett LLP, "Conflict Minerals Update: Business Organizations File Emergency Motion to Stay Rule" (May 8, 2014).

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