

but to issue a second request to give it more time to address these questions and concerns. The “pull and trigger” gives the government this extra time by restarting the clock of the initial review period.

view. In this regard, the initiative provides for regulators to be more aggressive during the initial 30-day waiting period in their efforts to obtain and digest the information they need to clear the deal, or narrow the issues with which they have outstanding concerns.¹⁰

⁷ Under the recently amended HSR rules, the filing fee has been increased from \$45,000 for all transactions to the following schedule of fees depending on the dollar value of the deal: \$45,000 for deals valued between \$50 million and \$100 million; \$125,000 for deals valued between \$100 million and \$500 million; and \$280,000 for deals valued at \$500 million or more. The Council on Economic Priorities