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Washington Service Bureau, Inc.
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Act	33
Section	4(1)
Rule	144
Publication	8-1-73

JUL 3 1973

David Richardson, Esq.
Peabody & Arnold
53 State Street
Boston, Massachusetts 02109

Re: Advent Corporation

Dear Mr. Richardson:

This refers to your letter of May 31, 1973, requesting advice concerning the determination of the holding period and the number of shares of Advent Corporation ("Advent") that may be sold pursuant to Rule 144 by an individual whose shares were formerly held of record by a nominee partnership.

You indicate that between July 25, 1969, and February 11, 1970, Advent issued 20 investment units, consisting of 5,000 shares of common stock and a \$10,000 note convertible into shares of Advent common stock. Five units were purchased by nominee partnerships, established for the sole purpose to hold record ownership of Advent securities. In addition to the unit, the nominee partnerships purchased, for certain of the beneficiaries, shares of Advent common stock in connection with an offering to shareholders in April, 1970. In July, 1972, all of the nominee partnerships were simultaneously dissolved and the Advent common stock held by each nominee partnership was distributed to the beneficial owners, which shares included those issued upon conversion of the notes.

Based on the facts presented, this Division will not object if the holding period for the common stock is taken to commence at the time of their acquisition by the nominee partnerships. However, all shares sold by the individuals within two years after the dissolution of the nominee partnerships must be aggregated for the purpose of determining the limitation on the amount of securities sold under Rule 144.

Sincerely yours,

John Heneghan
John Heneghan
Deputy Chief Counsel

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