Content meets the cloud

Aereo and the future of cloud TV

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Contents

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Introduction

On 25 June 2014, the US Supreme Court pulled the plug on Aereo's TV streaming service, ending a long-running and bitter courtroom battle.

Never before have the minutiae of copyright law attracted so much attention – and for once it wasn't just the lawyers who were poring over the statute books. When disruptive technology meets the law, the outcome is never certain, and the build-up to Aereo saw all sides of the debate making claims about the massive impact this case could have on the future of the content and cloud industries.

The first reason that Aereo attracted so much attention is that it was probably the highest-profile test case to date of disruptive technology stretching the boundaries of copyright law, with a billion dollar industry on the one side and an ambitious (and some would say reckless – but rather well-funded) startup on the other. The second reason is that, in a world where the relationship between content and cloud is more important than ever, Aereo was also a case that had massive implications.

This decision mattered not just to those who were directly involved – that is, US TV companies on the one hand and Aereo on the other. It mattered to all content-creators who argue that Aereo, and services like it around the world, are pirating their content in broad daylight.

Aereo mattered also to the cloud computing industry, for whom the prospect of a broad, anti-cloud judgment sent shivers down the spine.

Finally, Aereo mattered not just in the US but around the world. Copyright law may be territorial in nature but the media and technology industries are now global. Many of the same principles have been considered – and decided, with varying outcomes – in courts from London to Tokyo and most major markets in between.

Whichever way one looks at it, Aereo matters. In this report, lawyers from Olswang's international team of digital media and technology specialists provide an analysis of the decision itself and consider what it might mean for the media and technology industries around the world.

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Analysis of the decision

By Joel Vertes, Senior Associate, Olswang UK

The Supreme Court's decision in Aereo is a vindication for broadcasters and content-creators, who have for years campaigned for judicial protection against unauthorised exploitation of their content. The decision rules Aereo's service unlawful, whose business model was redistributing third party television content without licence or consent, and making considerable profit in doing so. The decision has similarities, both in terms of the facts of the case and its ultimate outcome, to the case brought in the English courts by various broadcasters against a UK-based streaming service, TVCatchup. However, the strong dissenting opinion illustrates how complex an issue this is for services which fall on the borderline of copyright protection despite their parasitic nature.

What's the case about?

Aereo sold a service enabling subscribers to watch TV channels, which it streamed over the internet, a few seconds behind the real-time broadcasting of the channels over the air. Each time a user wished to view a particular channel, he had a dedicated aerial that streamed directly to him alone. This is unicasting (one-to-one) as opposed to multicasting (one-to-many). The claimants (or "petitioners" before the Supreme Court) included various TV producers and broadcasters which owned copyright in the broadcasts and programs.

The allegation was that Aereo infringed the copyright-owner's exclusive right to "perform the copyright work publicly" which included the right to "transmit or otherwise communicate a performance of the work to the public". There are two parts here:

1. Do Aereo "perform" the work?
Yes. Aereo argued that they merely supplied equipment which was capable of receiving and re-transmitting television broadcasts: it was tantamount to the same thing as a consumer's traditional set up, except the consumer's own aerial was connected via the internet. US law had been specifically amended some years ago to ensure that cable TV networks which retransmitted broadcast content were captured by the copyright legislation. Unlike a cable television network - where the transmission was "always on" and you simply need to turn on the television knob to receive it - in Aereo's case nothing happens until the user requests the stream. Any "performance" (argued Aereo) was therefore by the user alone, not Aereo as well. The Court rejected this, arguing that a click on a website is simply "today's 'turn of the knob"; and that the difference is not sufficient to exonerate Aereo from being a "performer".

2. Is the transmission/communication to the "public"?
Yes. The Court held that you can transmit or communicate to the public not only by one-to many transmissions, but also by multiple one-to-one unicast transmissions. The fact that each transmission was private does not mean that the sum of communications were not made to the "public".

Analysis

European broadcasters and content-producers, especially those who supply content to US broadcasters for consumption, should view this case with interest (and relief). The Supreme Court's reversal of the earlier finding is protective of their position and will be helpful in preventing unauthorised retransmissions of their content over the internet. However, the strong dissenting argument of Justice Scalia suggests the argument is not quite that clear-cut. Whilst even there he "shares the Court's evident feeling that [Aereo's service]… ought not to be allowed". However, he is reluctant to "distort the Copyright Act to forbid it".

Aereo's view, supported by the dissenting judges, is that its subscription service is akin to a "providing library cards for copy-shop" – i.e. granting paying users access to technology which they have to turn on and use themselves with no further input from Aereo, and which can be used for both legitimate and illegitimate purposes (some of the content was not copyrighted). One of the pivotal elements of the judgment is the Court finding equivalence between Aereo's service and a cable television service. In doing so, it held that the absence of cable's "always-on" nature doesn't negate that equivalence. The dissenting Judges objected strongly to this argument – their view being that since Aereo does not make the choice of content, it is not performing and cannot be directly liable.

A similar factual scenario arose in the TVCatchup proceedings (albeit there the meaning of "cable" is important for other reasons). Olswang acts for three English broadcasters, ITV, Channel 4 and Channel 5, in ongoing proceedings now before the Court of Appeal. TVCatchup receives free-to-air broadcasts, and streams them over the internet on a one-to-one, unicast basis to individual members of the public. TVCatchup is free to subscribe to and makes money from advertising.

The High Court held TVCatchup were found to be carrying out the act of "communication", even though (just as an Aereo) it was the user who had to trigger the stream by requesting it. The judgment relied on the European Court's finding that the change in the medium of transmission (i.e. via the internet, as opposed to broadcast) amounted to a new act of communication and therefore required copyright owners' consent. In another parallel with Aereo, the Court found that TVCatchup's communications were to the "public" even though each stream was on a one-to-one basis.

What minor issues are still before the Court of Appeal in TVCatchup, the broad (unappealed) finding of liability by the High Court reflects the weight of the Court's judgment in the broadcasting community's favour. Both the US and European Courts have now ruled against these piggyback streaming services, which seek to exploit television content without payment or permission.

The international perspective

Aereo may be the highest-profile case to date but it is far from being the first disruptive technology startup in the TV sector to test the boundaries of existing copyright laws. Many cases have gone before, not just in the US but around the world.

Lawyers from Olswang's international team weigh up the implications of Aereo, and the outlook for cloud TV, in their local markets.

Asia: The outlook for cloud TV in a connected Asia

Matt Pollins, Associate, Olswang Asia

The US Supreme Court in Washington, DC may be some 12 timezones from Singapore but you can be sure that the Aereo case was being followed very carefully in the offices of media and technology companies across the city-state.

Why was a US law case about a US service and US content owners being monitored so closely in Asia? After all, Asia has, as of the time of writing, never had an Aereo.

It is worth noting at this point that cloud TV is very much a reality in Asia, with a broad range of legitimate and illegitimate services already available across the continent. Indeed, courts across the region have for some time been wrestling with the implications of cloud TV services on existing copyright laws. There have been multiple cases, from the 2010 case of RecordTV in Singapore to the 2011 case of Maneki TV in Japan (the former decided in favour of the cloud TV service, the latter in favour of the content owners – don't look here for clear winners and losers, either).

The first reason that Aereo matters in Asia is the habit judges have, when they find themselves in unchartered waters, to look to decisions reached elsewhere. The RecordTV case in Singapore, in which the court surprised many by finding in favour of the service provider, drew heavily on the 2008 Cablevision decision in the US. Put simply, when the next Aereo-like service pops up, there's a reasonable chance that courts in Asia will look towards Europe and the US for precedent.

Another reason that Aereo matters in Asia is what one might call the "age of Rocket Internet". That is, a time of rapid rollouts, when disruptive business models from one part of the world can be launched in untapped markets at record speed. Regardless of the copyright law rationale, it seems likely that a clear decision in favour of Aereo (and the subsequent positioning of Aereo as a legitimate, mainstream service that would inevitably have followed) might just have encouraged an entrepreneurial-type somewhere to ask themselves whether there might be an opportunity there for "the Aereo of Asia". And whilst that might have been good news for copyright litigators, it might also have damaged the possibility of content owners and cloud platforms finding sustainable, collaborative business models.

So, post-Aereo, what is the prognosis for cloud TV in Asia?

Copyright law challenges remain, particularly in those jurisdictions with weaker enforcement of intellectual property rights. Whichever way one looks at Aereo, it did at least go to great cost and expense to try to position itself as being within the boundaries of copyright laws. In some Asian countries, by contrast, there are more plainly illegitimate services that don't even go to those lengths, relying instead on weaknesses in the intellectual property enforcement regime to survive. Of course, Asia is a diverse place, and countries like Singapore, Japan and Korea do have very well-developed intellectual property enforcement regimes, but there are still some countries that do not, and in those countries, we will continue to see illegitimate cloud TV services enjoying some successes and, by doing so, discouraging legitimate services from launching.

But there is also a big opportunity for legitimate cloud TV services in Asia. Although it remains the case that a large proportion of consumers in some Asian countries do not have easy access to a device with a broadband connection capable of streaming high quality video, Asia is nonetheless in the midst of a period of explosive and unparalleled growth in connectivity and connected devices, and that is in a continent with over 50% of the world's youth.

With some help at government level from some more decisive action on intellectual property enforcement, if stakeholders can find collaborative business models that appropriately reward content owners, enable cloud TV operators to monetise innovative platforms and, most of all, cater to the growing demand of this connected "Asia 2050" generation, then Asia might just be the next big opportunity for legitimate cloud TV services. And, if they can't, then it is probably a matter of time before the principles at play in the US Supreme Court last week are being debated in a court somewhere in Asia.

France: Bleak prospect of success for an Aereo-like service?

By Alya Bloum, Avocat à la Cour, Olswang France

The US Supreme Court had to determine whether Aereo performed a copyright work and whether it did so publicly. So which way might this have gone before a French court?

The US Supreme Court held that like a cable company, Aereo "transmitted a performance", i.e. communicated it with its own equipment, whereby images and sounds were received beyond the place from which they were sent. Article L.122-2 of the French Intellectual Property Code (IPC) provides that: "Performance shall consist in the communication of the work to the public by any process whatsoever […]." Under French law, if the technical means provided are not merely used to maintain or improve the quality of the reception of a pre-existing transmission, it shall be considered that there is a new and separate transmission of a copyrighted work, i.e. a new "performance".

Aereo argued that its transmissions were private performances because each of these performances is capable of being received by one and only one subscriber. The US Supreme Court held that the Copyright Act suggests that "the public" consists in a large group of people outside of a family and friends and that the public need not to be gathered together spatially or temporally. As far back as 1994, the French Cour de Cassation (6 April 1994, no.92-11186) ruled that a hotel that has provided parabolic antenna to its clients has made a performance of copyrighted works, even though TV channels were being broadcasted in separate rooms. It therefore seems likely that the reasoning of the US Supreme Court would be followed by the French Courts on this point.

Of course, French copyright law, like many others, provides several exceptions to the monopoly of the copyright holder, and an Aereo-like service might seek to rely on such an exception.

First, the private copy exception (Article L.122-5 IPC) provides that, once a copyrighted work has been disclosed for the first time, its author cannot prevent free and private performance exclusively made in a family circle. Such exception is narrowly interpreted by French courts. Put simply, Aereo's subscribers are not Aereo's family.

Second, Article L.122-5 IPC further provides that copies or reproductions made from a legal source reserved strictly for the private use of the copier and not intended for collective use are allowed. Aereo system tunes its antennas to the over-the-air broadcast such that it could be claimed that the source from which the signal is provided to users is legal. The exception, however, only applies when the copier and the user are the same person. In the Aereo system, it is Aereo which provides a copy of the program in a subscriber-specific folder.

It is also worth remembering that the French courts have previously decided against a cloud TV service which was operating without appropriate licences, namely Wizzgo. In that case, Wizzgo tried to argue that its service fell within these exceptions but the court disagreed, finding that they were exactly that – exceptions, not rights capable of being transferred.

For these reasons, we think the prospects of an Aereo-like service succeeding under the existing scope of French copyright law would be fairly bleak.

Belgium: The Bhaalu case rolls on

By Willem-Jan Cosemans, Associate, Olswang Belgium

In Belgium, a remote storage DVR called "Bhaalu" is currently the subject of a great deal of debate and controversy. The broadcasters (Medialaan, VRT and SBS) have launched proceedings against Bhaalu based on: (i) the Copyright Act; and (ii) the Flemish Decree of 19 July 2013.

The broadcasters are of the opinion that Bhaalu should have obtained their prior consent based on their exclusive reproduction right. Bhaalu, on the other hand, claims that it can invoke the exception of private copying provided by the Belgian Copyright Act since the user can only (i) use Bhaalu if he has subscribed to the particular channel, (ii) watch his own recordals and (iii) watch his recordals within the "family circle".

The Aereo case does not provide an interpretation on the exclusive reproduction right which would be necessary to draw any firm conclusions regarding the effects of the case on the current dispute regarding Bhaalu in Belgium. In addition, Bhaalu's technology is very different from the Aereo technology and, for that reason, the case will most probably have no direct implications on the dispute regarding Bhaalu. The Aereo-case has left many questions unanswered with regard to other kinds of technologies, such as remote storage DVRs, given the limited nature of the judgment. This is supported by the Court where it states that "questions involving cloud computing, remote storage DVRs, and other novel issues not before the Court, as to which 'Congress has not plainly marked the course,' should await a case in which they are squarely presented".

The broadcasters also believe that Bhaalu should have requested their authorization to use their signal in order to comply with the Flemish Decree of 19 July 2013 which applies to service providers and aims to protect the integrity of the signal being broadcasted. As for Aereo, Bhaalu claims that it merely provides equipment and cannot be categorized as a service. The Court has clearly stated that Aereo is not simply an equipment provider but sells a service that allows subscribers to watch television programs. However, due to the technological differences between Bhaalu and Aereo it remains an open question whether or not this statement will have any consequences on the Bhaalu dispute in Belgium.

Germany: A shift from rights infringement to rights acquisition

by Dr. Niklas Conrad, Senior Associate, Olswang Germany

Under US law as well as under German law, services like Aereo that allow subscribers to watch live television broadcasts over the internet touch upon different aspects of copyright, from the reproduction to the (re)transmission of protected works. In the Aereo case, the US Supreme Court concentrated on the aspect of Aereo's offering that allowed the user to stream the program (almost) contemporaneously with the over-the-air broadcast. The judgment does not relate to services that allow users the remote storage of content.

As regards the question of an illegal transmission of protected works, the Supreme Court's decision in many ways corresponds with the case law developed by the German Federal Court of Justice (BGH) with regard to online video recorders (the Shift.TV and Save.TV cases). Much like Aereo, these services captured an over-the-air broadcast, translated the signals into data that can be transmitted over the internet and stored the data in a subscriber-specific folder on their servers. In each case, the process was triggered by the individual subscriber's request for a program. As neither Shift.TV nor Save.TV had acquired any licenses in the content, two of the largest German broadcasters had sued for an infringement of their rights. Like the Supreme Court in Aereo, the BGH held that operators infringed the transmission right by passing the broadcaster's signals on to the subscriber's folder on the hard drive.

Contrary to the Supreme Court, the BGH also had to analyse whether the service resulted in illegal copying. In this context, the court found that the reproduction of the broadcast on the operator's servers could be attributable to the user (at whose request the copy was produced and who, depending on the technical set-up, could invoke a private copying exception). However, with regard to the transmission right, the BGH just like the Supreme Court ruled that the operator's service constituted an illegal retransmission by the operator. The BGH argued that, the service was not limited to the passing on of the signal of programs the operators had included in their offering. Rather, the operators had, at the same time, "offer[ed] the customers the capacity to receive the signals." Their activities were therefore "comparable to activities that are reserved for the author of the copyrighted work by the law."

Like the Supreme Court, the BGH (in line with the case law of the ECJ) also held that the transmission constituted a transmission "to the public". The fact that each subscriber received an individual copy of the program in their folder did not alter this assessment: As the transmitted signal was made available in parallel to a larger number of subscribers that were unrelated to each other, these subscribers, collectively, had to be considered a public. In this context, it has to be noted that neither Shift.TV nor Save.TV operated mini antennas that could be assigned to the individual subscriber. It is, however, doubtful if such a technical feature would have altered the BGH's assessment.

In view of the aforementioned case law and recent case law of the ECJ, the focus of the debate on online distribution of TV signals seems to shift from the question of rights infringement to the question of rights acquisition. Decisions such as the Aereo judgment may contribute to this development. In this context, it is worth noting that, based on an EU directive; the right for cable retransmission of broadcasted works can be acquired from collecting societies which are under an obligation to contract. As the broadcasters, too, are under an obligation to license the cable retransmission rights in their signal on adequate terms, the operation of cable systems is greatly facilitated in comparison to the operation of online TV platforms. In view of the newly emerging forms of online TV consumption, the extension of this privilege to other operators of retransmission services, regardless of the technology employed, has been heavily debated in Germany. Should such a legislative decision be taken, this would considerably alter the legal environment for the provision of online TV and VCR services in Germany in the future.

Spain: New reform proposals further support content creators

By Sofía Fontanals, Senior Associate, Olswang Spain

There has never been an "Aereo" case in Spain, so no one can say for certain which way such a case would be decided before a Spanish court.

Similar issues have, however, come before Spanish courts in the past. The closest case law that exists in Spain deals with the access to copyrighted works by hotel customers and hospital patients. In a way, these echo the discussions held in the US case about whether individual access to audiovisual works may fall within the scope of the exclusive right to public communication. However, this isn't much to go on.

All that being said, the legislative winds seem to be blowing against a "Spanish Aereo". Looking at the rationale/direction of the current reform of the Spanish Copyright Act (which aims at introducing a more robust protection of right holders in the digital environment), it seems that Aereo's (or other similar services) chances to overcome broadcasters' claims would certainly decrease should the current reform proposal progress to approval.

For instance, the private copying exception (a potential defence in case a court held that the storage of the selected TV programmes is made by final users and not by Aereo) is intended to be applied more restrictively. Amongst other things, in order to qualify as private copy, there can be no assistance of third parties to carry out the reproduction. In addition, some copies would be expressly excluded from the private copying exception - namely reproductions of works which have been communicated to the public by wired or wireless processes, so that any person can access to them from a place and at a time chosen by him, with the reproduction of the work being authorized according to that agreed by contract and, where appropriate, through the payment of a price.

Furthermore, so-called "indirect infringement" (considered as a relevant issue by the dissenting opinion in the US Supreme Court decision), whereby cooperators and those inducing / facilitating the infringing conduct may also bear liability, would, as part of the proposals, be viewed as prohibited conduct. This would mean that a potential defence by an Aereo equivalent in Spain that seeks to attribute exclusive responsibility to final users would have to be dealt with more cautiously.

As the new proposals progress towards approval, the chances for a "Spanish Aereo" are narrowing. However, it won't be until the first case hits the courts that we will have a judicial precedent to go on in Spain.

UK: Aereo and TVCatchup: Different courts, different laws, same result

By Tomos Jones, Associate, Olswang UK

In truth, while the Supreme Court's judgment in Aereo is fascinating, its direct applicability in judicial decision-making in the UK courts is likely to be limited. Onward retransmission of linear terrestrial channels by internet in the UK has, of course, already been addressed in detail in the TVCatchup litigation discussed above, and the Supreme Court carefully avoided commenting on video on demand/cloud PVR functionality, which it was not asked to address directly.

So might Aereo inform UK law going forwards? We see little prospect of that, partly because of the TVCatchup litigation, but also because the basis of the reasoning is quite different. While TVCatchup turned on the difference between the technical means of the original and subsequent transmissions, Aereo largely sets the technology to one side and focuses on the background to the legislative intention. That reasoning is (a) very US-specific, and (b) not one which it is easy to imagine a UK court following.

As discussed above, there are of course some parallels between the UK and the US scenarios, namely:

1. reinforcement of the point that consumers want the flexibility and functionality provided by new technologies, and that service providers who provide it uncover significant demand;

2. those service providers (at least initially) are often not the 'incumbents' or indeed 'authorised' – this is partly because non-infringing, authorised services can be slower to roll out, not least because of the need to coax underlying rights holders away from proven exploitation models toward new ones.

Increasingly, the UK has a rich range of authorised services encompassing (and indeed significantly surpassing) the functionality provided by TVCatchup. See for example the comprehensive live, on demand, streaming and download services provided by BBC iPlayer (in the free sector) and Sky (in the pay sector). Even the hitherto valid criticism, that authorised services created fragmentation (i.e. counter to the consumer need for 'all my TV in one place'), is beginning to be addressed by multi-platform availability of channels such as iPlayer, or multi-channel availability on platforms such as Sky.

The big question is whether that is hastened or hampered by services such as TVCatchup and Aereo, and the legal protection given against them.

What does this mean for cloud?

By Elle Todd, Partner, Olswang Singapore and London

The Aereo decision wasn't just the outcome of a case about content and piracy eagerly followed by lawyers, broadcasters, channel providers and the creative industry. At stake was also a threat to a multi-billion dollar cloud industry which was reportedly "freaked out about this case" and the likelihood that it could have much wider implications. Would a loss on the part of Aereo result in wider-reaching consequences in terms of liability for well-known services such as Dropbox?

A sigh of relief (albeit one with a remaining tremor of uncertainty in it) was to be heard last week on that count. The judges emerged with a decision which pointed the finger at Aereo whilst seeking to distinguish its activities and services from cloud service providers whose service is essentially storage provision.

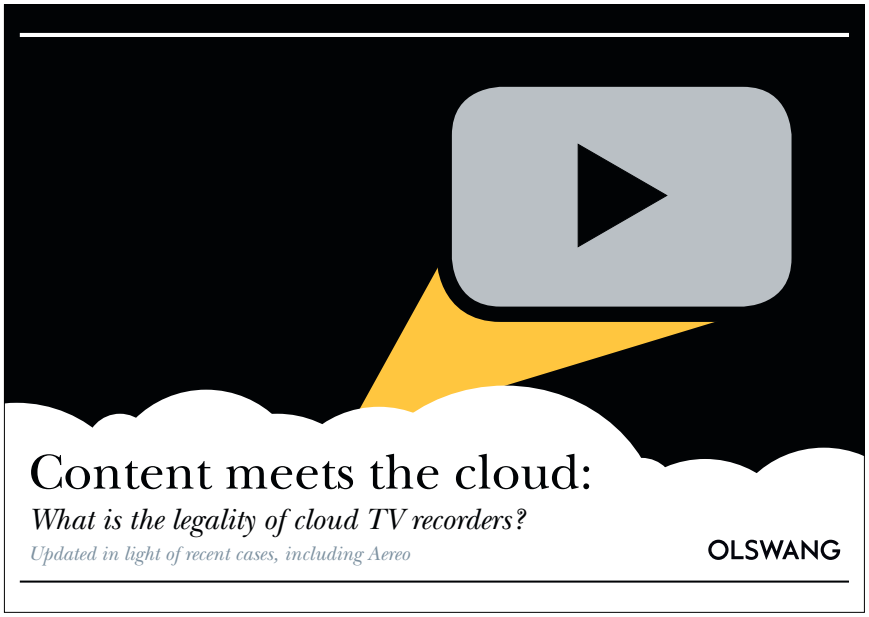
A problem remains however that the judges were clearly battling with this element of their decision and resisting responsibility to set out exactly where this dividing line falls. Indeed, the court tried its hardest not to focus on detailed technological distinctions. Instead it focused on the fact that Aereo's practices were "highly similar to those of [a cable TV solution" and that it was to all intents and purposes a contrived solution to avoid copyright legislation. So the cloud industry is left with a vague test to apply: when does their activity start being dangerously "similar to" a cable TV solution and when is it sufficiently different?

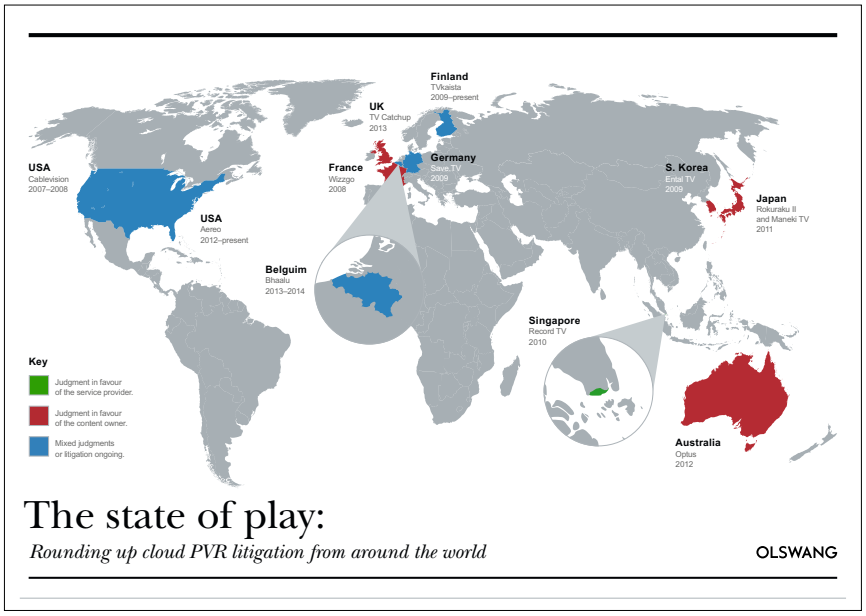
The judgment gives a few hints and titbits. For example, it states that there is some comfort for new technologies in their finding that "public" applies to a group of individuals who pay primarily to watch broadcast television programmes and does not include those who act as owners or possessors of the relevant product (so distinct from storage in that case then). However, overall, it states that "questions involving cloud computing, remote storage, DVRs and other novel issues….should await a case in which they are squarely presented" meaning that we may well see further debate in different jurisdictions on this point.

However, this is clearly not the major blow for the cloud industry that it could have been. It hasn't created or resulted in a cloud vs content decision and the two industries will continue working together in many different ways. After all, much of the television and movie industry now relies on cloud services for the provision of their own OTT (over the top television) offerings. Netflix, which has been called the biggest cloud app going, and others such as Lovefilm or Magine, survive and even thrive precisely as a result of their popular combination of cloud plus content. The distinction however is that they work with the content industry and legitimately license the content that they make available. For those who don't and who generate users and revenue from pirated content, the world has certainly become a more dangerous place to do business.

Further reading: Olswang's Cloud PVR World Report

Alongside this report, Olswang is publishing a world map and country-by-country overview of cloud PVR litigation around the world. We round up the case law from around the world to try to establish the state of play in the market, picking up on common issues emerging across jurisdictions and considering how these issues will shape the industry as content meets the cloud.





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