



NEWSLETTER

Autumn 2016 Edition

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Austria

Austrian CICERO Member expands

We are pleased to announce our recent expansion by starting a permanent cooperation with Mr. Michal Slany, attorney at law, in our law firm.

Mr. Slany was born in Bratislava, Slovakia. He studied law at the University of Vienna and worked for various commercial law firms in Vienna for several years. Mr. Slany's areas of expertise include real estate, corporate, payment services and dispute resolution. He advises his clients in German, English, Slovak and Czech language.

For further information, please contact:

Michal Slany

*Maybach Görg Lenneis & Partners Rechtsanwälte
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MAYBACH · GÖRG · LENNEIS
& PARTNER RECHTSANWÄLTE



Belgium

In June 2016 the merger between Ardent Advocaten and the law firm of Weren Schwagten has been finalized.

Weren has now become a full partner at our office: he is focusing on insolvency law. He is designated by the commercial court Antwerp as a bankruptcy receiver and is offering services to our clients with regard to commercial law related matters.

In September and October Charlotte Schwagten and Frederik Rademaker joined our office. Charlotte and Frederik will start their training in our office and have recently taken their oath: they hope to be qualified lawyers by the end of 2019. They both will focus on commercial law. Including its paralegals, Ardent Advocaten now has a staff of 25 people. Thanks to its collaboration with Acco Accountants, we now have more than 55 people offering legal, accountancy and tax services to our clients.

Following this expansion, Ardent Advocaten and Acco Accountants are in need for more space. We have therefore purchased the neighboring real estate in our Antwerp office which will be demolished and rebuilt in the coming months. Opening of the new building is expected in one year.

For further information, please contact:

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**Legal Business Euro Elite**

In July this year Andreas Neocleous & Co was selected for inclusion in the inaugural "Euro Elite" top 100 law firms in Europe, published by Legal Business, the market-leading monthly magazine for the UK and global legal market. Published ten times a year, the magazine reaches thousands of senior lawyers at major commercial firms across the UK and key financial centres of Europe, Asia and the US. It is published by Legalease, the publishers of the respected "Legal 500" rankings. Firms from 42 countries across Europe were evaluated, but for 17 countries no firm achieved the required standards. Andreas Neocleous & Co LLC is the only firm from Cyprus selected for the "Euro Elite".

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Andreas Neocleous

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Cicero Interview: Fiona McAllister

Introduction to Fiona McAllister, partner at Mundays in London.

1- How would you describe your business?

Mundays LLP works primarily with small and medium-sized enterprises ("SMEs") providing support in both the private and business lives of our clients. We provide key business and personal legal services and are known for both business and private law. On the corporate side our clients range from small to mid-size companies on the whole, but we do act for some larger and high profile international clients.



On the private client side, most of our individual clients are professionals or business people in the UK.

Our London office particularly serves foreign nationals who are either living or investing in the UK. Our London office has definitely helped with our international clients. It is mainly a property office and the London property market is still active with international investors.

Mundays has been established for more than 60 years and many clients both personal and corporate have a longstanding relationship with us. One of our key philosophies is to provide a close personal service and form a bond with all our clients. I have been a partner at Mundays for more than 20 years and have many longstanding clients some of whom have become personal friends.

2- What are your personal fields of expertise?

I have always been primarily involved in advising SMEs on contractual matters. Originally my emphasis was on contentious work, but the focus has changed over the years. Our legal system has moved away from advocacy and moved toward advice and mediation where issues do arise. I particularly advise owners and managers of businesses on contractual situations both corporate and personal and on shareholder and partnership issues. I believe that my background and experience as a trained mediator brings added value.

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3- What is happening in the legal industry in England at the moment?

At the moment it is very much business as usual, although there is a lot of talk about what the future might hold. In fact we currently have not seen any material change following the referendum vote by the United Kingdom to exit from the European Union. It is fair to say that most lawyers are not expecting a great deal of change to our key regulations on business or health and safety. In the UK we are very compliant on the whole with all regulations issued whether by our own Government or by Europe. So whilst there has been much complaint about the complexity of regulations from Europe, we are unlikely to tear up all the rules. That is just not British! Just last year we celebrated the 800th anniversary of the “Magna Carta” seen by many as the first seed of democracy in Western Europe. It will certainly be important going forward for the legal profession to keep a watchful eye on the politicians to protect our democratic principles, for many a key issue in the referendum vote.

4- You have been involved with Cicero for some time and you are also a board member. Why?

From a business perspective I think it is crucial to be a member of a good network from which you can seek support or refer clients as so much of our business has an international element reflecting that of our clients on both the corporate and private side of the business. This can create interesting opportunities, on the one hand, and difficult conflict-of-laws questions, on the other. The advantage of the Cicero network (of which I am a huge fan), is that we do get to know representatives of member firms at our conferences. Networking helps to get to the point at which you can feel very comfortable not only with the quality of our work which has to be a given but that Cicero members will be able to deal with your clients in the efficient and timely manner that you would wish.

Being a member of the Cicero board allows me to support the development of Cicero. I hope to be involved in the decisions that move it forward to its next level and focus on its structure going forward as a corporate entity looking to have a more global emphasis. I enjoy the Cicero conferences at which it is great to see so many people from different countries and different backgrounds meeting together in harmony and friendship and enjoy shared experiences which are so often as a result of our wonderful host’s efforts, quite unique.

5- What do you do outside the office hours?

Private life falls into two halves – the part of the year where my partner Christopher and I are alone and the rest of the year, at University vacations, when our three adult children who live with us fill the house together with friends, acquaintances and sundry others. We enjoy together classical concerts and theatre, particularly Shakespeare, and being out and about in the English countryside visiting the many castles and stately homes that abound, nearly all of which have excellent cafes and satisfy my love of English afternoon tea, my favourite meal of the day!

My colleagues and I would love to have a cup of tea (or a pint at a local pub) with any Cicero members who are of course welcome to visit.

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MUNDAYS.



Mundays LLP is a Lex 100 Winner for 2016/17.

The Lex 100 survey has announced the winners for the 2016/17 survey consisting of anonymous responses gathered from over 3,000 trainees at 173 law firms across the UK.

Mundays has been announced as a winner in the Client Contact category where trainees '*feel like part of the team - rather than a small cog*' and also a winner in the Work/Life Balance category.

To see the full 2016/17 survey results visit www.lex100.com.

Mundays Corporate & Commercial team were shortlisted for 'Firm (Regional) of the Year' in The Legal 500 UK 2017 Awards.

The Legal 500 United Kingdom Awards 2017 is a concept that recognises and rewards the best in-house and private practice teams and individuals over the past 12 months. We were the only law firm selected from The South East. Unfortunately, we were not selected as winners of this award, which was won by one of the other 8 national contenders, but are delighted our team was recognised.

Mundays LLP advises shareholders of Nebulas on the acquisition by SecureLink.

Surrey and London law firm Mundays LLP has advised the shareholders of Nebulas on the acquisition by SecureLink Group of the company, who received backing from private equity firm InvestCorp.

Nebulas, based in London, is the UK's largest independent cyber security service provider. Nick Garlick (the founder of Nebulas) will remain as managing director of the company and will continue to operate the business going forward. Nick Garlick said "We were impressed with how quickly and diligently the two teams worked in order to get the deal done in the short timescale available. Becoming part of a European group represents a natural step for Nebulas and with Nebulas on board SecureLink can now boast a revenue run rate of Euro 235 million."

David Irving said "*We are delighted to have advised the shareholders of Nebulas, long-standing clients of the firm, on this transaction and we wish Nebulas all the best for the next step in its journey*".

The Mundays' transaction team was led by Head of Corporate and Commercial, Neale Andrews and Corporate and Commercial Partner, David Irving, who were supported by Corporate Associate, Howard White. SecureLink were represented by Gibson Dunn & Crutcher LLP (London).

Surrey Law Firm Mundays ranks in national legal directory.

Cobham-based law firm Mundays has risen up the ranks in three practice areas and is again recognised as one of the South East's leading law firms, according to the recent Legal 500 rankings.

Mundays' Commercial Property and Property Litigation teams rose for a second year to tier one in the rankings for Kent, Surrey and Sussex and South East respectively, with the commercial property team described as 'a class leader in commercial property'.

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The firm's corporate & commercial practice area rose to tier two, with partner David Irving again listed alongside head of property litigation Stephen Morris in the elite "Leading Lawyers" list, The Legal 500 UK 2016's guide to outstanding lawyers nationwide.

Elsewhere in the firm, the employment and family teams held onto their top tier ranking each with three members of the team recommended by the directory. Commercial litigation, contentious trusts and probate, construction and personal tax, trust and probate sustained tier three rankings. Tier two ranked banking & finance practice is led by dual UK and US-qualified partner Mark Andrew.

The Legal 500 is an annual independent legal directory which recommends both firms and individuals and the firm now boasts four top tier practices, six tier two and three practices, 17 recommended lawyers and two leading lawyers.

Commenting on the rankings, Managing Partner at Munday's, Valerie Toon, said: "To see two practice areas progress into the top tier is a complement to our teams continued hard work to become leaders in their areas. Having three practice areas in total rise and the other seven claim the same tier in this year's Legal 500 is a testament to the quality of resources the firm has to offer. The local area remains in the firm's roots and to be recognized as a leading firm across Kent, Surrey and Sussex is where we aim to be".

"Our lawyers are not only experts in their fields but ensure their clients get a tailored service for their needs – The Legal 500 recognizes the experts we have across the firm."

For further information, please contact:

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MUNDAYS.



Bernards law firm's news

In 2016, our Quality and Environment labels (ISO 9001 and 14001) have been renewed for three years after an audit carried out by Veritas office control.

Since the middle of September, Bernards welcomes Tijana Pavlovic, a student in master 2 contract and litigation at the University Paris-Ouest-Nanterre-la-Défense (Paris X), for a block release training of one year.

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Germany

Russian athletes represented by GvW Graf von Westphalen in defending against exclusion from the Paralympics in Rio.

Five Russian athletes have now filed constitutional appeals with the German Constitutional Court (Bundesverfassungsgericht) against their exclusion from the Paralympics Games 2016 in Rio de Janeiro. GvW Graf von Westphalen filed the appeals for the athletes in Karlsruhe.

The International Paralympic Committee (IPC) had excluded the Russian Paralympic Committee (RPC) and, thus, all Russian para-athletes at the same time on the basis of systematic Russian government. The Committee defended itself before the International Sports Court of Arbitration (CAS) as well as the Swiss Federal Court, and the athletes defended themselves against the exclusion before the District Court (Landgericht) Bonn and the Courts of Appeals (Oberlandesgerichte) in Cologne and Düsseldorf.

Although the application by the para-athletes for a temporary injunction against the refusal to admit them to the Paralympic Games did not succeed before the German Constitutional Court, the Karlsruhe constitutional judges made it clear in the reasons stated for their order of 15 September 2016 (1 BvQ 38/16) that a constitutional appeal that could still be filed was by no means obviously inadmissible or obviously without merit. The court stated that it was necessary to take into account numerous individual circumstances and difficult legal issues, especially relating to the relationship of individual athletes to the world organization IPC and potential influence of national antitrust law on these decisions.

In light of this background, GvW has now also filed the constitutional appeals. The brief in support of the constitutional appeal dated 10 October 2016 especially argues that the individual fundamental rights of the para-athletes were not adequately taken into account. This is argued to especially apply to the extent that the Düsseldorf Court of Appeals raised a general suspicion in its decision against all Russian athletes that they had engaged in doping. The brief also argues that no legal remedy was granted within a reasonable period of time.

GvW Graf von Westphalen represented the RPC and the Russian athletes in all proceedings before the German courts through Felix Prozorov-Bastians (head of the Russian Desk, lead attorney), Dr. Julia Christine Pohl (all litigation), Prof. Dr. Christian Winterhoff, Dr. Jan Felix Sturm (both constitutional law), Dr. Reinhard Höß (sports law) as well as Christian Kusulis (antitrust law).

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Cicero is seeking interest from colleagues who have an interest in immigration law to form a collaboration.

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&

Nicola Tegoni

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EUGENE F. COLLINS



DUNNINGTON
BARTHOLOW & MILLER LLP
ATTORNEYS AT LAW

Studio Legale Afferni Crispo & C. advises consumer association in legal proceedings before the European Court of Justice concerning a possible restriction of competition in the pharmaceutical sector.

The Italian Council of State, the highest administrative court in Italy, recently referred a case to the Court of Justice of the European Union (CJEU) dealing with a possible restriction of competition in the pharmaceutical sector.

The case had reached the Council of State as an appeal against a ruling of the Administrative Tribunal for the Lazio Region, which had confirmed a decision of the Italian Antitrust Authority.

According to the Italian Antitrust Authority, the pharmaceutical companies Hoffmann-La Roche and Novartis had put in place, contrary to Article 101 TFEU, a horizontal agreement restricting competition and designed to achieve an artificial differentiation of the medicinal products Avastin and Lucentis by manipulating the perception of the risks

involved in the off-label use of Avastin in the field of ophthalmology. The Italian Competition Authority found that that agreement was concluded with the objective of unlawfully maximising the income from those medicinal products and had a direct effect on the balance of health expenditure.

The questions referred to the CJEU focus on issues such as:

- 1) the proper construction of Article 101 of the Treaty on the Functioning of the European Union (TFEU) in a case involving the possible restriction of competition between the parties to a licensing agreement;
- 2) the possibility for a National Antitrust Authority to define the relevant market autonomously *vis-à-vis* the content of marketing authorisations for medicinal products granted by the competent pharmaceutical regulatory authorities;
- 1) the interchangeable nature, under Article 101 TFEU, of a medicinal product used off-label and a medicinal product that has received a marketing authorisation in respect of the same therapeutic indications;
- 2) whether Article 101 TFEU requires, for the purposes of defining the relevant market, to establish, in addition to the essential fungibility of pharmaceutical products on the demand side, whether or not those products have been supplied on the market in accordance with the regulatory framework concerning the marketing of medicinal products;
- 3) finally, whether a concerted practice intended to emphasise that a medicinal product is less safe or less effective can be regarded as intended to restrict competition, when the idea that that product is less effective or less safe, although not supported by reliable scientific evidence, cannot, in the light of the level of scientific knowledge available at the time of the events in question, be indisputably excluded.

Studio Legale Afferni Crispo & C. has advised one of the consumer associations that are parties to this proceeding since the phase that took place before the Italian Antitrust Authority.

The text of the questions raised by the Italian Council of State are available on the “Eur-Lex” website at the address

<http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1477317967076&uri=CELEX:62016CN0179>.

For additional details, reference can be made to the post published on the blog “EU Law Radar” at the following address:

<http://eulawradar.com/case-c-17916-hoffmann-la-roche-is-off-label-medicine-use-off-limits-to-eu-cartel-law/>.

For further information, please contact:

Lorenzo Schiano di Pepe

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Garfield-Bennett English Solicitors (“GBES”) succeeds in wresting trusteeship from renegade Panamanian trustee.

A recent string of judgments in Stock v Pantrust International SA sees Jersey’s Royal Court flexing its jurisdictional muscles in swiftly dealing with a dispute concerning two Jersey trusts.

The beneficiary of two discretionary trusts approached GBES with a view to removing the trustee and having G.B. Trustees Limited (a Jersey-regulated entity and part of the Garfield-Bennett group) appointed in the place of the Panamanian trustee as well as having purported changes to the proper law of the trusts declared invalid.

The longstanding relationship between the settlor of the trusts and one of the directors of the Panamanian trustee had broken down to such an extent that the director now claimed that the settlor controlled and benefitted from the assets of the trusts which he claimed to be sham arrangements.

GBES worked with Panamanian Counsel to register a complaint with the Panamanian regulator as to the trustee’s handling of the affairs of the trusts in 2014 which resulted in the first cancellation of a trust company’s licence in Panama.

The refusal of the trustee to comply with the Panamanian regulator’s order resulted in an application before the Royal Court for a transfer of trusteeship. The sequence of judgments removed the Panamanian trustee. It also declared a change of proper law which had purportedly occurred in 2007 to be invalid.

The judgements demonstrate how matters may be dealt with expeditiously by the Jersey courts where the circumstances require it. It further shows that relationships formed in Jersey, and governed by its laws, will not be lightly surrendered despite executed documentation to the contrary. Proper consideration will be given to the documentation and surrounding factual matrix leading to well-reasoned decisions provided in a relatively short space of time (in this instance, eleven months from start to finish).

For further information, please contact:

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18 November Proclamation Day of the Republic of Latvia and “Staro Rīga” Light Festival (17.11.2016 to 19.11.2016)

**Tamberga
& Partneri**
Advokātu birojs

On 18 November 1918, in Riga, the People's Council of Latvia proclaimed the independence of the Republic of Latvia. Various events take place across the country throughout the day. The celebration begins on the first half of the day with a parade and laying of flowers at the Freedom Monument with participation of the President of Latvia and other important government officials. A parade of the National Armed Forces takes place in the afternoon at the 11th November Embankment. In the evening there are torchlight processions, and the celebration in Riga ends with magnificent fireworks over the River Daugava.

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Proclamation Day of the Republic of Latvia is also brightened by “Staro Rīga” Light Festival (more information: <http://www.staroriga.lv/013/lv/>), that takes place in Riga from 17.11.2016 to 19.11.2016 and offers an international program of light and multimedia installations. Buildings, squares, bridges and monuments turn into unique pieces of light art, supplemented by performance art and musical and theatrical elements. “Staro Rīga” Light Festival has taken place since 2008.

Let the November be brighter! We will be glad to see you in Riga!

For further information, please contact:

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Tamberga & Partneri (Riga, Latvia)
tamberga@tamberga.lv



Do you have life science expertise?

Both Alison Choy Flannigan of Holman Webb in Australia and myself had extensive in house careers before joining our respective firms. I specialise in the life sciences and Alison's broader practice incorporates both life science and healthcare. We would be interested in making contact with other members of the Cicero family who have similar expertise with a view to exploring matters of mutual interest.

Calling investors

Because of the nature of our business Bonaccord has a steady stream of clients looking for investment from £250,000 to £25 million. We help our clients find investment and are always looking to extend the pool of investors. Most of our clients are in the life science, food and drink or specialty engineering sectors and most come with a good pedigree. Mundays has been in touch regarding some clients of theirs that are looking for interesting projects in which to invest and Fiona McAllister suggested that other firms within our network might have similar clients.

Would there be interest in circulating within the network lists of businesses looking for investment and investors looking for placements?

If interested please contact:

Patricia Barclay
Bonnaccord (Edinburgh, Scotland)
patricia@bonaccord.eu





South Africa

Bernadt Vukic Potash & Getz Attorneys received two awards this year:

- ACQ5 Global Awards 2016: South Africa – Boutique Law Firm of the Year (Corporate and Commercial) for a consecutive year, Bernadt Vukic Potash & Getz Attorneys
- ACQ5 Global Awards 2016: South Africa – Private Equity Lawyer of the Year, Keith Getz for a consecutive year, Bernadt Vukic Potash & Getz Attorneys

For further information, please contact:

Keith Getz

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**BERNADT ▪ VUKIC
POTASH ▪ & ▪ GETZ**
A T T O R N E Y S



Sweden

New partner joins Advokatfirman Westermark Anjou

Westermark Anjou reinforces its IT law specialist area with the addition of Karolina Lindgren Pekkari. Karolina has a background at one of the major Nordic law firms and she recently left her position as general counsel at CGI Sverige AB (part of CGI Group Inc.) to join Westermark Anjou. Karolina has extensive experience of the IT industry, IT-related contracts and data privacy issues.



About Advokatfirman Westermark Anjou

Westermark Anjou advises Swedish and foreign clients on business law. We specialize in corporate law, capital markets, mergers and acquisitions, dispute resolution, intellectual property and IT law. Our approach centers on teamwork and quality. Our aim is to be the best business law adviser in every case and for every client.

For further information, please contact:

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WESTERMARK ANJOU



Turkey

Marif Uğurlu | Law Firm

We are pleased to announce that Marif Ugurlu Law Firm moved into its new tower offices as of 22 August 2016 in order to provide state of the art facilities to its continuously growing team and to continue to meet and exceed client expectations. Our new office address is as follows (our telephone and fax numbers will remain the same):

Büyükdere Caddesi No: 127
Astoria B Kule 1401, Kat: 14
Esentepe 34394 Şişli
Istanbul / Turkey
T: +90 212 280 24 34 F: +90 212 283 81 89
www.mariflaw.com

Our new offices are situated at Astoria Towers, one of the most prestigious office towers in Esentepe business district. The infrastructure and design of our new office enables greater internal communication among our team, while strictly adhering to client confidentiality principle.

We are grateful for your continuous support and we look forward to welcoming you in our new offices.

For further information, please contact:

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Introduction to Nicola Tegoni

Nicola Tegoni is a new Partner at Dunnington, Bartholow & Miller LLP

Nicola's practice focuses on the area of U.S. Immigration and Nationality Law.

He provides legal assistance to companies who are in need of applying for U.S. visas for their Executives, Managers and employees at an intracompany level, and he also assists with the preparation and filing of U.S. visa petitions for foreign employees of U.S. companies who will be employed at a professional level in specialty occupations here in the United States. In addition, he assists with the preparation of U.S. Employment visas for foreign investors and entrepreneurs and with the preparation and filing of employment and investment based permanent residency ("green card") applications.

He also devotes a part of his practice to assist individuals with their U.S. Visa and green card needs who have demonstrated a record of extraordinary achievement in business.

For further information, please contact:

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Introduction to Donna Frosco

Donna Frosco is a new Partner at Dunnington, Bartholow & Miller LLP

Donna Frosco counsels domestic and foreign clients in transactions involving licensing, technology, cyber law, trademark and copyright as well as construction law. She also is an experienced litigator, representing clients as lead counsel before trial and appellate courts and at arbitration.

Her clients range from start-ups and individual entrepreneurs, to not-for-profit organizations and large entities across multiple industries and the arts. She assists clients from concept and potential brand strategy stages, through growth and, if necessary, resolution of contractual or infringement disputes.

She advises clients concerning trademark registration before the United States Patent and Trademark Office and counsels clients concerning protection of proprietary information and legal aspects of data security. She represents licensors and licensees regarding acquisition of exclusive rights to major labels. She also represents owners, contractors and construction managers in the building industry.

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CHI NEWS

CH International (CHI) is a world-wide association of accountants, auditors, tax specialists and business advisors.

New members

- Kuwait
- Thailand
- Slovenia

Potential members

- Portugal: We are working on a potential member in Portugal who will be visiting our board member Luis in Spain to discuss collaboration.
- CHI hot targets are Germany (to replace a member that had been acquired by a larger company) Poland, South Africa and North America.

CHI Annual Conference

We had a very successful conference in St Petersburg on 22nd September (social day photo attached). Filip Duwaerts from the board of Cicero attended.
CHI's next conference will be in Dubai at the end of October 2017.



Asian Pacific Regional group

Our Asian Pacific group had their group meeting on September 1st which was hosted by Cheng & Cheng, China/Hong Kong. The meeting also tied in with Cheng & Cheng 25 year anniversary dinner. Their next meeting and will be held in Australia.



SMS Latin America

Luis Vilaclara was in Bolivia last week presenting about CHI and networking at SMS Latin-American conference. Claire Berg introduced Cicero to Pablo San Martin the chairman of SMS Latin America to help them expand in the region.

For more information please contact:

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CONFERENCES



Spain

Cícero Meeting Nov. 2016: Madrid opens its doors

The six-monthly Cícero Meeting will take place in Madrid on **17, 18 and 19 of November**. It will be a unique occasion for sharing experiences, knowledge, and for promoting business relationships among our firms.

We have prepared an exhaustive agenda in order for you to enjoy a memorable week.



Madrid welcomes you, together with Ceca Magán, by means of our team which has been engaged with the organization of this meeting. This event has been arranged with great enthusiasm and excitement and will include premium restaurants, culture, leisure, amazing sites and an interesting professional content.

We would like to thank you for the welcoming attitude of all participants and we look forward to fulfilling your expectations.

Marketing and legal communication experts with great international experience will attend the work session, so that you will return to your home countries with some essential tips for enhancing your firms' competition and their ability to attract clients.

We would like to get the best out of the working session, addressing practical issues that might be interesting to all of us and that will make us think in order to apply the contents to our daily working routines. All the scheduled activities have been conceived so that juniors, seniors and part-ners make the most of your stay in our city.

We look forward to seeing you all in Madrid.

For further information, please contact:
Pamela Perez-Cuvit de Trivellato
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Croatia

Save the date—Croatia, 2017

More information will be provided soon.



Andrej Šooš Maceljki,
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New Cicero Editorial Board

We are pleased to announce that our Newsletter has a new Editorial Board composed of:

- Cyprus - **Balázs Veréb** – Tuller and Partners Law Firm 
- France - **Thierry Bernard** – Bernards Law Firm 
- Romania - **Aurora Damcali** - Leaua & Asociatii 
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