Washington, DC 20513 Washington, DC 20510 LOBBYING REPOI	Are Required To Complete This Page.
Registrant Name     Covington & Burling     Address    Check if different than previously reported.     1201 Penasylvania Avenue, N.W., P.O. Box 75     Principal Place of Business (if different from line 2)	H.U.
	State/Zip (or Country)     D.C. 20044       mail (optional)     5. Senate ID #       dearment@cov.com     11195-710       6. House ID #     31827058
	tination Date 11. No Lobbying Activity []
INCOME OR EXPENSES - Complete Either L 12. Lobbying Firms	ine 12 OR Line 13 13. Organizations
INCOME OR EXPENSES - Complete Either L 12. Lobbying Firms INCOME relating to lobbying activities for this	ine 12 OR Line 13
INCOME OR EXPENSES - Complete Either L 12. Lobbying Firms INCOME relating to lobbying activities for this reporting period was:	ine 12 OR Line 13 13. Organizations EXPENSES relating to lobbying activities for this
INCOME OR EXPENSES - Complete Either L	ine 12 OR Line 13 13. Organizations EXPENSES relating to lobbying activities for this reporting period were:
INCOME OR EXPENSES - Complete Either L 12. Lobbying Firms INCOME relating to lobbying activities for this reporting period was: Less than \$10,000 □ \$10,000 or more S <u>40,000</u> Income (nearest \$20,000) Provide a good failh estimate, rounded to the nearest \$20,000, of all lobbying related income for the client (including all payments to the registrant by any other	Ine 12 OR Line 13 13. Organizations EXPENSES relating to lobbying activities for this reporting period were: Less than \$10,000 □ \$10,000 or more □ ⇔ \$
INCOME OR EXPENSES - Complete Either L 12. Lobbying Firms INCOME relating to lobbying activities for this reporting period was: Less than \$10,000 □ \$10,000 or more	ine 12 OR Line 13         13. Organizations         EXPENSES relating to lobbying activities for this reporting period were:         Less than \$10,000         \$10,000 or more         \$\$ \$         Expenses (hearest \$20,000)         14. REPORTING METHOD. Check box to indicate expense accounting method. See instructions for description of options.         []       Method A. Reporting amounts using LDA definitions only         []       Method B. Reporting amounts under section
INCOME OR EXPENSES - Complete Either L 12. Lobbying Firms INCOME relating to lobbying activities for this reporting period was: Less than \$10,000 □ \$10,000 or more S <u>40,000</u> Income (nearest \$20,000) Provide a good failh estimate, rounded to the nearest \$20,000, of all lobbying related income for the client (including all payments to the registrant by any other	ine 12 OR Line 13         13. Organizations         EXPENSES relating to hobbying activities for this reporting period were:         1.ess than \$10,000         \$10,000 or more         \$\$ \$

egistrant engaged in		nt during the reporting	reflect the general issue areas in g period. Using a separate pa ded.	
5. General issue an	ea code <u>RET</u>	(one per page)		
<ol> <li>Specific lobbyin</li> </ol>	ig issues			
	it a well-funded pension plan for pension plan participant		its surplus assets to fund othe	r
[7. House(s) of Con	gress and Federal agencies co	ntacted .	Check if None	
House of Represent Senate	latives			
	ndividual who acted as a lobbj	yist in this issue area		
	ndividual who acted as a lobby Name		icial Position (if applicable)	New
18. Name of each is		Covered Off	icial Position (if applicable)	New
	Name		icial Position (if applicable)	New
18. Name of each is John M. Vine	Name	Covered Off Partner	icial Position (if applicable)	New
18. Name of each is John M. Vine	Name	Covered Off Partner	icial Position (if applicable)	New
18. Name of each is John M. Vine	Name	Covered Off Partner	icial Position (if applicable)	New
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18. Name of each is John M. Vine	Name	Covered Off Partner	icial Position (if applicable)	New
18. Name of each is John M. Vine Roderick A. DeArn	Name	Covered Off Partner Partner		
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18. Name of each is John M. Vine Roderick A. DeArn	Name	Covered Off Partner Partner		
<ol> <li>Name of each is</li> <li>John M. Vine</li> <li>Roderick A. DeArn</li> <li>Interest of each</li> <li>Signature</li> </ol>	Name Ren1  Foreign entity in the specific	Covered Off Partner Partner		
<ol> <li>Name of each is</li> <li>John M. Vine</li> <li>Roderick A. DeArn</li> <li>.</li> <li>.</li> <li>19. Interest of each</li> </ol>	Name Heni Foreign entity in the specific	Covered Off Partner Partner	frabove 🕅 Check if	