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## Hart Scott Rodino Filing Requirements Change as of March 19, 2026

By: Michael Naughton and  
Carla Hine

The pre-2025, less burdensome Hart Scott Rodino (HSR) premerger notification filing requirements are now in effect, following a Fifth Circuit order *not* to keep a stay in place while the Federal Trade Commission (FTC) appeals a lower court [decision](#) vacating the FTC's more expansive premerger notification filing rules. (For our prior client alerts discussing developments in this case, see [here](#) and [here](#).)

The FTC's Premerger Notification Office announced that they are now accepting HSR filings under the prior, less burdensome rules and will continue (at least for now) to accept HSR filings made pursuant to the more expansive rules which had been in effect since February 10, 2025. While the old rules are generally less burdensome, parties with manufacturing activity will need to revert to more granular reporting of revenues by industry and product codes.

Given the FTC's pending appeal, the status of the HSR rules remains fluid. We are monitoring this developing situation and will provide updates as available.

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If you have questions concerning the contents of this issue, or would like more information about Weil's Antitrust practice group, please speak to your regular contact at Weil or to an author listed below:

Michael Naughton (New York)	<a href="#">View Bio</a>	<a href="mailto:michael.naughton@weil.com">michael.naughton@weil.com</a>	+1 212 310 8754
Carla Hine (Washington, D.C.)	<a href="#">View Bio</a>	<a href="mailto:carla.hine@weil.com">carla.hine@weil.com</a>	+1 202 682 7112

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