



NASCHITZ, BRANDES & CO., ADVOCATES
5 TUVAL STREET, TEL-AVIV 67897 ISRAEL
TEL. 972-3-623-5000 FAX. 972-3-623-5005

HAIFA OFFICE: 2 PAL-YAM AVENUE,
CITY WINDOWS, OREN BUILDING, HAIFA 33095 ISRAEL
TEL. 972-4-864-4433 FAX. 972-4-864-4833

WWW.NBLAW.COM

December 15, 2008

Securities and Exchange Commission
Division of Corporation Finance
Office of Mergers and Acquisitions
450 Fifth Avenue
Washington, D.C. 20549
Attention: Christina Chalk, Esq.

Re: Request for exemptive relief – letter dated December 15, 2008

Ladies and Gentlemen:

We refer to the letter, dated December 15, 2008 (the "Letter"), from Andris Vizbaras, a partner of the firm Carter, Ledyard & Milburn LLP, New York office ("CLM"), writing to you on behalf of our client, Ronex Holdings, Limited Partnership, a limited partnership organized under the laws of the State of Israel (the "Bidder"), with respect to the tender offer described therein (the "Offer"). In the Letter, the Bidder requested that the Staff grant exemptive relief to the Bidder from certain provisions of Rule 14d-7(a)(1) promulgated under the Securities Exchange Act of 1934, as amended. The Letter also made reference to discussions held between CLM and Israeli counsel to the Bidder and between Israeli counsel to the Bidder and the Israeli Securities Authority regarding Israeli law relating to the Offer (the "Discussions"). This is to confirm that we are acting as Israeli counsel to the Bidder in connection with the Offer and hereby confirm that the descriptions of the Discussions in the Letter and the descriptions of Israeli law, regulation and practice relating to the Offer described in the Letter are accurate and complete. We are members of the Bar of the State of Israel and, in rendering this letter, we do not pass (expressly or by implication) on the laws of any jurisdiction other than the State of Israel. This letter is limited to matters of Israeli law, regulation and practice related to the Offer.

Sincerely,

Sharon A. Amir, Adv.
Naschitz, Brandes & Co.