

UNITED STATES OF AMERICA  
BEFORE THE  
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT COMPANY ACT OF 1940  
Release No. 29206 / April 9, 2010

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In the Matter of :  
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SeaCo Ltd. :  
22 Victoria Street :  
P.O. Box HM 1179 :  
Hamilton HM EX :  
Bermuda :  
 :  
(812-13753) :  
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ORDER UNDER SECTION 3(b)(2) OF THE INVESTMENT COMPANY ACT OF  
1940

SeaCo Ltd. filed an application on February 9, 2010, and amendments to the application on March 4, 2010 and March 16, 2010, requesting an order under section 3(b)(2) of the Investment Company Act of 1940 (the "Act"). The order would declare that applicant is primarily engaged in a business other than that of investing, reinvesting, owning, holding or trading in securities. Applicant is in the shipping container business.

On March 17, 2010, a notice of the filing of the application was issued (Investment Company Act Release No. 29176). The notice gave interested persons an opportunity to request a hearing and stated that an order disposing of the application would be issued unless a hearing was ordered. No request for a hearing has been filed, and the Commission has not ordered a hearing.

The matter has been considered and it is found, on the basis of the information set forth in the application, as amended, that applicant is primarily engaged in a business other than that of investing, reinvesting, owning, holding or trading in securities.

Accordingly,

IT IS ORDERED, under section 3(b)(2) of the Act, that the declaration requested by SeaCo Ltd. (File No. 812-13753) is granted, effective immediately.

For the Commission, by the Division of Investment Management, under delegated authority.

Florence E. Harmon  
Deputy Secretary