Liberty Media Corporation

Name of contact for additional information: INVESTOR RELATIONS
Telephone No. of contact: 877-772-1518
City, town, or post office, state, and ZIP code of contact: ENGLEWOOD, CO 80112

Date of action: 8/3/23

Recapitalization of common stock

CUSIP number: 531229 862
Serial number(s): OLD FWONB;
Ticker symbol: NEW FWONB;LLYVB

Organizational Action

Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action: On August 3, 2023, Liberty Media Corporation ("LMC") recapitalized its existing common stock (the "reclassification"). In the reclassification, each issued and outstanding share of LMC's series B liberty formula one common stock ("old FWONB") was reclassified and exchanged for 1 share of LMC's new series B liberty formula one common stock ("New FWONB") and 0.0428 of a share of LMC's new series A liberty live common stock ("LLYVB"). Cash was paid in lieu of fractional shares of LLYVB.

Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis: The tax basis of each share of old FWONB held immediately prior to the reclassification should be allocated 97.7431% to the 1 new FWONB share and 2.2569% to the 0.0428 fraction of the LLYVB share received in exchange for such share of old FWONB held immediately prior to the reclassification.

Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates: Average price of high and low based on first day of trading. There has been limited trading volume for FWONB. As such, it is reasonable to use the trading price and basis allocation for FWONA to determine the basis allocation for FWONB.

For Paperwork Reduction Act Notice, see the separate instructions.
17. List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based:

THE RECLASSIFICATION IS INTENDED TO QUALIFY AS A TAX-FREE REORGANIZATION UNDER IRC SECTION 368(a)(1)(E), AND ACCORDINGLY, HOLDERS OF OLD FWONB WILL NOT RECOGNIZE INCOME, GAIN OR LOSS WITH RESPECT TO THE RECLASSIFICATION, EXCEPT WITH RESPECT TO CASH RECEIVED IN LIEU OF FRACTIONAL SHARES. UNDER IRC SECTION 358, THE AGGREGATE BASIS OF THE NEW FWONB AND LLYVB SHARES RECEIVED BY A HOLDER IN THE RECLASSIFICATION (INCLUDING ANY FRACTIONAL SHARE OF LLYVB THAT IS DEEMED TO BE RECEIVED AND THEN SOLD) SHOULD BE THE SAME AS THE HOLDER’S AGGREGATE BASIS IN THE OLD FWONB SHARES THAT WERE EXCHANGED THEREFOR.

18. Can any resulting loss be recognized?

IF A HOLDER RECEIVED CASH IN LIEU OF A FRACTIONAL SHARE OF LLYVB IN THE RECLASSIFICATION, A HOLDER COULD RECOGNIZE A LOSS, SUBJECT TO CERTAIN LIMITATIONS, TO THE EXTENT THE TAX BASIS ALLOCATED TO SUCH FRACTIONAL SHARE EXCEEDS THE CASH RECEIVED BY THE HOLDER AS A RESULT OF THE DISPOSITION OF SUCH FRACTIONAL SHARE. OTHERWISE, NO LOSS MAY BE RECOGNIZED.

19. Provide any other information necessary to implement the adjustment, such as the reportable tax year:


Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature: [Signature]
Date: 8/8/23
Title: SENIOR VICE PRESIDENT

Print/Type preparer’s name: TY KEARNS
Preparer’s signature: [Signature]
Date: 8/8/23
Check if self-employed
PTIN
Firm’s EIN:
Phone no.

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-6054