

MICHAEL A. GEIBELSON

November 13, 2008

To the Federal Deposit Insurance Corporation

Re: Request to Extend Unlimited TLGP Coverage to IOLTA Accounts

Dear Colleagues at the FDIC:

I write as a member of a firm that is committed to making legal services available to all those in need regardless of their means, as an attorney who regularly handles cases on a pro bono basis, and as the President of the board of directors of the Disability Rights Legal Center, the oldest cross-disability pro bono organization in the country.

I write because I am gravely concerned that as a result of the FDIC's implementation of the Temporary Liquidity Guarantee Program (TLGP), lawyers are likely to move their trust accounts to non-interest bearing deposit transaction accounts, and that as a result, the Interest on Lawyer Trust Accounts (IOLTA) will drop significantly. Such moves would deprive a countless number of people of legal services and, as a result, their civil and other rights. Such an injustice cannot be justified by the temporary liquidity problems facing the banking industry, and should not be borne by the most vulnerable members of our society.

I strongly urge you to extend the unlimited TLGP program coverage to IOLTA accounts.

Very truly yours,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.



Michael A. Geibelson