

**From:** Stuart Andrews [mailto:stuart.andrews@nelsonmullins.com]  
**Sent:** Tuesday, November 11, 2008 3:31 PM  
**To:** Comments  
**Subject:** FDIC RIN 3064-AD37

I am writing to urge the FDIC to amend the TLGP interim rule or to otherwise take action necessary to provide full coverage for the Interest on Lawyer Trust Accounts (IOLTA). I have been a lawyer in private practice in SC for 30 years. As a former board member of SC Legal Services and current member of the SC Access to Justice Commission, I know first-hand of the significant contributions the IOLTA program has made and continues to make to support the funding of legal services to low income South Carolinians. Without these funds, legal aid positions would be eliminated and offices would be closed. Clients facing foreclosures, repossessions, and reductions in governmental services as well as those needing protection from abusive family members and predatory lenders would do so without representation.

As the second leading source of funding for the delivery of indigent civil legal services, IOLTA has become a core component of the strategies of states throughout the nation to achieve the illusive goal of justice for all. Please do everything you can to avoid causing any further erosion to the patchwork financing structure that has been cobbled together over the years to protect the interests of the poor.

Thank you.

Stuart Andrews