

March 14, 2025

Via Email nharper@gibsondunn.com

Nick Harper, Esq.
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Re: *History Associates Incorporated v. FDIC*: Case No. 1:24-cv-1857-ACR

Dear Nick,

Today the FDIC produced additional, redacted documents to the FDIC's FOIA Reading Room related to History Associates Incorporated's (HAI) FOIA Requests at issue in the above captioned case. First, in the spirit of increasing transparency, the FDIC has revised its redactions to the February 21 production ("Revised Second Production") in a manner that reduces the volume of redactions. Second, the FDIC is making an additional March 14 production ("Third Production") of an additional two documents. The Third Production was redacted applying the same standard as the Revised Second Production. The Revised Second Production and the Third Production were published in the FDIC's FOIA Reading Room ([available](#) here).

With the Third Production today, the FDIC has completed its records search regarding HAI's FOIA requests for "pause letters," which is at issue in Count I of HAI's Amended Complaint. In sum, in response to the FOIA requests, the FDIC has located and produced 185 documents totaling 752 pages, which were released in part. The information withheld and redacted is exempt from disclosure under FOIA exemptions 4, 6, and 8, 5 U.S.C. §§ 552(b)(4), (b)(6), and (b)(8).

The FDIC is also conducting a renewed search for documents related to the FDIC's FOIA-related policies or practices and plans to produce additional documents related to that search in the very near-future.

FDIC counsel look forward to conferring with you next week and working together to draft the next Joint Status Report.

Very truly yours,

Office of the General Counsel

cc: Eugene Scalia, Esq. escalia@gibsondunn.com
Jonathan Bond, Esq. jbond@gibsondunn.com
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