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November 12, 2008

Submitted via internet at
<http://www.fdic.gov> and e-mail
[to comments@fdic.gov](mailto:comments@fdic.gov)

Ms. Sheila C. Bair
Chairman, Federal Deposit Insurance Corporation
Washington, DC 20429

Re: Exception Needed to Temporary Liquidity Guarantee Program to Protect Lawyer Trust Accounts under the Interest on Lawyer Trust Accounts Program

RIN # 3064-AD37

Dear Ms Bair:

I am writing to you on behalf of Varnum, Riddering, Schmidt & HowlettLLP. We are a full-service law firm consisting of over 150 attorneys, with offices in Grand Rapids, Kalamazoo, Novi, Lansing and Grand Haven, Michigan.

My letter concerns the potential adverse consequences to the Interest on Lawyer Trust Accounts (IOLTA) program that are posed by the FDIC's Temporary Liquidity Guarantee Program (TLGP). In particular, we are concerned with the failure of TLGP to cover IOLTA program accounts.

Ms. Sheila C. Bair
November 12, 2008
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You have received a letter dated October 22, 2008 from Thomas M. Susman of the Governmental Affairs Office of the American Bar Association, which outlines in detail the history and purpose of the IOLTA program, as well as the reasons which support an extension of the TLGP benefits to cover IOLTA accounts. We urge you to give serious consideration to the points made by the ABA, and to include an exception to the TLGP rules that will explicitly provide funds in IOLTA accounts with the unlimited deposit insurance coverage available under TLGP.

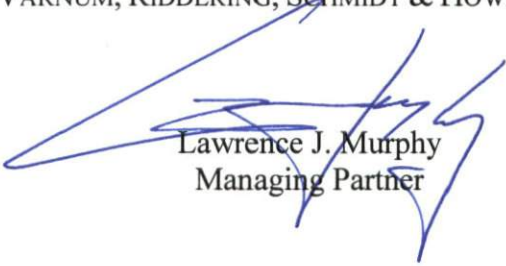
The IOLTA program was first implemented in the state of Michigan in 1990. Since that time, over \$18 million garnered under the program has been distributed in the state, through the Michigan State Bar Foundation, for law-related charitable projects that improve the administration of justice and support civil legal aid for low-income families. These projects include non-profit legal aid programs, which provide much needed legal assistance to those who cannot otherwise afford it. Without such assistance, many persons (including the disabled, veterans, senior citizens, and children) may be without the means to seek legal redress and protection or enjoy full access to the courts.

The programs and assistance funded through IOLTA are particularly important to Michigan citizens at the present time, in light of the current economic challenges faced by our state.

Thank you for your consideration of this matter. Please feel free to contact me if you need additional information.

Regards,

VARNUM, RIDDERING, SCHMIDT & HOWLETT^{LLP}



Lawrence J. Murphy
Managing Partner

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cc: Julie M. Strandlie, ABA
via e-mail: jstrandlie@staff.abanet.org