## BLOCK, CROUCH, KEETER, BEHM & SAYED, L.L.P.

ATTORNEYS AND COUNSELORS AT LAW
POST OFFICE BOX 4 28402
310 NORTH FRONT STREET, SUITE 200
WILMINGTON, NORTH CAROLINA 28401

FRANKLIN L. BLOCK (RETIRED) AULEY M. CROUCH, III JEFFREY P. KEETER CHRISTOPHER K. BEHM LINDA B. SAYED\* SUMIT K. JAIN EMILY A. MCNAMARA

\*Board Certified Family Law Specialist

Telephone: (910) 763-2727 Facsimile: (910) 762-6429 www.bcklawfirm.com

Bolivia Office: 1729 Southport-Supply Road Bolivia, NC 28422 Telephone: (910)846-2211

Facsimile: (910) 846-3000

November 13, 2008

## VIA FACSIMILE - (202) 898-7062

Mr. Robert E. Feldman Executive Secretary FDIC 550 17 St., NW Washington, DC 20429

Re: Comments, RIN # 3064-AD37 Full Coverage of IOLTA Accounts

Dear Mr. Feldman:

Our law firm was the 2005 recipient of the Pro-Bono Award for Small Firms given by the North Carolina Bar Association. We are well aware of the increasing need of the poor and disadvantaged for legal services and the limited resources available to fund Legal Aid of North Carolina. If the FDIC were not to fully insure IOLTA accounts, a shift of funds to non-interest bearing accounts is likely to occur. The resulting reduction in income generated by IOLTA accounts would severely hamper the ability of Legal Aid to provide legal services to the neediest of our citizens and that would be a shameful development in these harsh economic times. Thus, we urge the FDIC to fully insure all IOLTA accounts as part of the Temporary Liquidity Guarantee Program.

To meet the deadline for commenting, we are also sending this letter by e-mail to Comments@FDIC.gov.

Mr. Robert E. Feldman Executive Secretary FDIC Page 2

Please see that our concerns are compiled with others offered on this important issue.

Very truly yours,

For the Firm,

Auley M. Crouch, III

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Sumit K. Jain

cc: jstrandlie@staff.abanet.org strandlj@staff.abanet.org GeorgeJ@legalaidnc.org Emily A. McNamara