

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

_____)	
FAIRHOLME FUNDS, INC., et al.,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	No. 13-465C
)	(Judge Sweeney)
THE UNITED STATES,)	
)	
<i>Defendant.</i>)	
_____)	

**PLAINTIFFS’ PUBLIC, REDACTED MOTION TO REMOVE THE
“PROTECTED INFORMATION” DESIGNATION FROM
DEFENDANT’S MARCH 20 PRIVILEGE LOG**

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REDACTED VERSION

**PLAINTIFFS' PUBLIC, REDACTED MOTION TO REMOVE
THE "PROTECTED INFORMATION" DESIGNATION
FROM DEFENDANT'S MARCH 20 PRIVILEGE LOG**

Plaintiffs Fairholme Funds, Inc., et al. ("Plaintiffs" or "Fairholme") respectfully move, pursuant to Paragraphs 17 and 19 of the Protective Order ("P.O.") entered in this action (Doc. 73), for entry of an order requiring the Government to remove the "Protected Information" designation it has affixed to its fourth privilege log, which was produced to Plaintiffs on March 20, 2015 (the "March 20 Log"). Because the March 20 Log contains no information that meets the Protective Order's definition of Protected Information, the Government's designation of the log as protected was inappropriate.

In seeking this relief, Plaintiffs ask that this Court treat the Government's March 20 Log in the same way that the Government itself treated the first three privilege logs that it served in this case. The Government did not designate its first three privilege logs for protection. Nor could it have done so; those logs contained no proprietary, confidential, trade secret, or market-sensitive information. Although the March 20 Log is no different, the Government nevertheless chose to designate it as Protected Information. Notably, the Government has not even attempted to explain why the March 20 Log qualifies as Protected Information; nor has it attempted to explain how that log differs from its earlier, unprotected, logs. As far as Plaintiffs can tell from their own comparison of the logs, the March 20 Log appears to differ from the first three logs only in that the Government has now elected, on its own initiative, to include the government email addresses of the senders and recipients of several catalogued documents. The unrequested addition of such email addresses does not suffice to render the March 20 Log as Protected Information, but even if it did, those email addresses could easily be redacted from the log.

Even without this fundamental and irreconcilable disconnect between the Government's treatment of the March 20 Log and its very different treatment of its previous logs, the Government's effort to shroud the March 20 Log in secrecy would be unprecedented. In fact, Plaintiffs are aware of no reported decision holding, over another party's objection, that a run-of-the-mill privilege log like the March 20 Log should be treated as a protected document. When one adds in the fact that the log that the Government seeks to treat as confidential is essentially indistinguishable from the multiple unprotected logs that the Government had previously produced, the unprecedented and inappropriate nature of the Government's actions is obvious. The courts have already criticized litigants' increasing tendency to over-designate discovery materials as confidential.¹ The Government has now taken that practice to new, and disturbing, heights.

For these reasons, as more fully explained below, the Court should enter an order requiring the Government to remove the Protected Information designation from the March 20 Log. In addition, because the Government is continuing to produce privilege logs on a rolling basis, thus raising the likelihood that similar disputes will arise in the future, the Court should direct the Government that it should not designate future privilege logs as protected unless they contain information that meets the definition of Protected Information, in which case the Government should also produce a redacted version of the privilege log.²

¹ See, e.g., *In re Violation of Rule 28(d)*, 635 F.3d 1352, 1358 (Fed. Cir. 2011) (noting with disapproval that "[p]arties frequently abuse Rule 26(c) by seeking protective orders for material not covered by the rule," and observing that other courts of appeals "have repeatedly condemned the improper use of confidentiality designations"), citing *Jepson, Inc. v. Makita Elec. Works, Ltd.*, 30 F.3d 854, 858 (7th Cir. 1994) and *Procter & Gamble Co. v. Bankers Trust Co.*, 78 F.3d 219, 222 (6th Cir. 1996).

² On April 3 and 17, 2015, the Government produced its fifth and sixth privilege logs, both of which it also designated as Protected Information. Because, as far as Plaintiffs can tell, these recent logs are identical in relevant respects to the March 20 Log, it is Plaintiffs' expectation that the Court's ruling with respect to the March 20 Log will apply perforce to the April 3 and April 17 Logs.

QUESTION PRESENTED

Does the March 20 Log contain information that meets the definition of Protected Information under Paragraph 2 of the Protective Order?

STATEMENT OF THE CASE

The ongoing discovery in this case is being conducted pursuant to a standard protective order that permits the parties to “designate as Protected Information any information, document, or material that meets the definition of Protected Information set forth in this Protective Order.” P.O. at p.1. The Protective Order defines Protected Information to consist of “proprietary, confidential, trade secret, or market-sensitive information, as well as information that is otherwise protected from public disclosure under applicable law.” P.O. ¶ 2. The order also clarifies what does *not* constitute Protected Information, namely “discovery material that has been provided to or prepared by any Government agency (which shall include, for these purposes, FHFA) and that is available under applicable law.” The Protective Order mandates that an attorney supervise the process of designating information as protected. *Id.* It also permits a producing party to initially designate all information as protected solely in order to expedite production, but only subject to the receiving party’s right to subsequently challenge that designation in accordance with the procedures established under Paragraph 17 of the order. *Id.*

Paragraph 17 makes clear that the receiving party has the right to challenge a producing party’s designation of material as Protected Information. P.O. ¶ 17. *See also id.* ¶ 19 (“This Protective Order shall be without prejudice to the right of any party to bring before the court at any time the question whether any particular document or information is Protected Information or whether its use otherwise should be restricted.”). Under the procedures established by Paragraph

17, the receiving party must first notify the producing party of its disagreement with the designation of the information at issue as protected. P.O. ¶ 17. The parties are directed to first seek to resolve the dispute within five business days of the producing party's receipt of such notice. *Id.* After those five days, “[i]f the dispute is not resolved, the party challenging the protected designation, upon no fewer than three (3) business days’ written notice to the producing party may, by specifying the basis on which it claims that such designation is not appropriate or that such disclosure is proper, seek a ruling from the court that the information is improperly designated or that disclosure is allowed.” *Id.* The burden of persuasion rests with the moving party. P.O. ¶ 17.

To date, the Government has served six privilege logs on Plaintiffs. The first was provided to Fairholme on or around August 22, 2014, and the second was provided to Fairholme on or around October 28, 2014. Together, the August 22 and October 28 Logs (reproduced in the accompanying appendix at Exhibits A and B) catalogued approximately 430 FHFA documents that the Government asserted, “provisionally,” were privileged, including a number of documents for which it asserted presidential privilege.³ For each document, the logs provided a log number, the date of its creation, its author or sender, its recipient, those who were copied on the document, any additional recipients, a brief description of the document, and the privilege being asserted. The Government did not designate these logs or any information they contained as protected.

³ In February of this year, the Government informed Plaintiffs, for the first time, that all of the privilege assertions it had made in its various privilege logs were “provisional” in nature. As we have previously noted to the Court, *see* Transcript (Feb. 25, 2015 hearing) at 7-9 (Doc. 135), Plaintiffs believe that the Government’s unprecedented “provisional” assertion of privilege is wholly without justification in the law. To date, the Government has not made *any* final assertions of privilege.

A third log was provided to Fairholme on or around January 16, 2015. The January 16 Log (reproduced in the appendix at Exhibit C) catalogued approximately 230 Treasury Department documents that the Government asserted were privileged, including a number of documents for which the Government asserted presidential privilege. The documents include emails, news releases, memos and even news summaries that had been circulated among officials at Treasury and the White House. For each of these documents, the log again provided a log number, the document's date, its author or sender, its recipient, those copied on the document, any additional recipients, a brief description of the document, and the privilege being asserted. Once again, the Government did not designate this log or any of the information it contained as protected.

On March 20, 2015, the Government sent Fairholme its fourth privilege log. The March 20 Log (reproduced in the appendix at Exhibit D) was a revised Treasury privilege log, and it included among the approximately 460 documents identified in the log a large number of documents that had already appeared in the January 16 Log. Quite unlike its treatment of its earlier privilege logs, however, the Government decided to designate the March 20 Log itself as Protected Information. It made this designation even though the log provides the same information – a log number, the document's date, its author or sender, its recipient, those copied on the document, any additional recipients, a brief description of the document, and the privilege being asserted – as the first three logs the Government had provided. The Government's designation of the March 20 Log as protected meant, among other things, that Fairholme's counsel could not disclose that log to their clients, or to the parties to the other pending suits challenging the Net Worth Sweep in this Court, and thus could not seek their assistance in assessing the Government's hundreds of assertions of privilege. The government's designation also prevented the Plaintiffs from sharing the log with the myriad of public policy experts, members of Congress,

and others who are keenly interested in the issues implicated by this suit.

In accordance with the procedures established by the Protective Order, Fairholme's counsel notified the Government by email on the following business day (March 23) that the March 20 Log did not qualify, in Fairholme's view, as Protected Information. Email from Vince Colatriano to Gregg Schwind *re* "Fairholme v. US; Revised Privilege Log (PROTECTED INFORMATION)" (March 23, 2015) (reproduced in the appendix at Exhibit E). Fairholme asked the Government to respond promptly so that the parties might resolve their dispute within the five business days mandated by the Protective Order. *Id.* And Fairholme made clear that it was "particularly interested in [the Government's] views as to which information appearing in the revised log meets the Protective Order's definition of Protected Information, and how that information differs from the information provided in previous privilege logs provided by the Government, none of which were designated as Protected Information." *Id.*

The Government did not respond to Fairholme's notice, or otherwise seek to resolve the parties' dispute as to the designation of the March 20 Log, within the five-day period specified in the Protective Order. Having received no response to its inquiry, on March 31, Fairholme's counsel sent a second email, notifying the Government of its intent to seek a ruling from the Court, while also stating that, "[i]n the meantime, we of course remain open to considering any views you might have on our request to 'de-designate' the log." Email from Vince Colatriano to Gregg Schwind *re* "Fairholme v. US; Revised Privilege Log (PROTECTED INFORMATION)" (March 31, 2015) (reproduced in the appendix at Exhibit F). The email noted that after carefully reviewing the privilege log, Fairholme had found that the "the only real difference ... between it and previous unprotected logs [the Government has] provided is the addition of email addresses on the revised log." Fairholme informed the Government that it did not believe that the inclusion

of this information “suffice[d] to qualify the log as protected,” but that it was nevertheless willing, “on the assumption that that was the change that prompted the Government to designate the log as protected, to redact the email addresses from the log.” *Id.*

Two days later, on April 2 the Government finally offered its first response to Fairholme’s objections and inquiries: a flat refusal to de-designate the March 20 Log and a bald assertion that the log was protected. The substance of the Government’s response took up all of three short sentences:

We will not agree to de-designate the privilege log. The information in the log meets the definition of “protected information” in the protective order. Moreover, Fairholme has not offered any justification for its request or otherwise stated why it needs the log to be de-designated.

Email from Gregg Schwind to Vince Colatriano *re* “Fairholme v. US; Revised Privilege Log (PROTECTED INFORMATION)” (April 2, 2015) (reproduced in the appendix at Exhibit G).

The Government neither attempted to explain its decision to designate the log as protected nor attempted to identify the information in the log that qualified as Protected Information. Nor did the Government identify any relevant differences between the March 20 Log and its prior unprotected logs, or respond to Fairholme’s proposal to create a redacted version of the log.

On April 3, the Government produced another privilege log, a revised FHFA privilege log asserting privilege with respect to more than 1,000 FHFA documents. And on April 17, the Government produced a revised Treasury privilege log asserting privilege with respect to more than 1,150 Treasury documents. As with its March 20 Log, the Government designated the April 3 and April 17 Logs as protected, even though they appear substantively no different from (and indeed list many of the same documents originally identified in) its prior unprotected logs.⁴

⁴ While the Government has refused to explain why it has treated its recent privilege logs so differently from its earlier, unprotected logs, it is worth noting that after the Government

ARGUMENT

I. THE GOVERNMENT HAS IMPROPERLY DESIGNATED THE MARCH 20 LOG AS PROTECTED INFORMATION

1. As noted previously, Plaintiffs have found no decision or other authority holding that what the Government is attempting to do here – designating as protected nonsubstantive and nonsensitive information, contained in a standard privilege log, that is essentially identical to information that the Government had previously conceded was neither sensitive nor confidential – is proper. The Protective Order in this case certainly provides no support for the Government’s position. That order was carefully crafted both to protect a producing party’s legitimate interests in restricting the use of truly confidential or otherwise sensitive information whose disclosure or unauthorized use could cause real competitive harm to the producing party or could have the types of market-distorting effects that the Government has warned about in previous filings in this case, and to protect a receiving party from efforts by the producing party to indiscriminately shield information produced in discovery regardless of whether such information is in fact sensitive. Thus, the order does not grant either party *carte blanche* to designate as protected any material that it might wish to shield from public scrutiny. Nor does a bare assertion that a document contains Protected Information insulate that document from disclosure when it in fact contains no Protected Information. None of the information in the March 20 Log even remotely qualifies as protected under the Court’s order, and the Government has not even attempted to demonstrate

served its first three logs, Fairholme discussed the Government’s broad privilege assertions in its annual report, and the press as well began to take notice of, and to take the Government to task for, the “remarkable secrecy demands that the government has made in th[is] matter.” Gretchen Morgenson, *After the Housing Crisis, a Cash Flood and Silence*, New York Times, Feb. 14, 2015, Business Day: Fair Game. The Government appears to have responded to this criticism of its effort to shroud its actions in secrecy (*i.e.*, its broad privilege assertions) by attempting to also shroud even that very effort itself (*i.e.*, its privilege logs) in secrecy.

that it does. Because the Government's March 20 Log does not meet the standard for designation as Protected Information, the Government should be ordered to remove that designation.

The Government's March 20 Log, like its prior logs, does not contain either "proprietary, confidential, trade secret, or market-sensitive information," or any "information that is otherwise protected from public disclosure under applicable law." P.O. ¶ 2. The log contains no proprietary or trade secret information belonging to FHFA, Treasury, Fannie, Freddie, their affiliates, or to any other person or entity. Although the Government has previously asserted that the disclosure of three- to seven-year-old internal *documents* might disturb financial markets, a facially implausible claim since markets react to expectations of future events and not historical events, it is clear that a mere log that identifies documents without in any way disclosing their substance will not affect markets.⁵ Indeed, the release of the Government's previous logs had no impact at all on the housing finance market. Thus, we need not speculate about the impact of the release of this information, for we know it will not roil markets or have any other deleterious effect against which the Protective Order is designed to guard. And although the log asserts that numerous documents are privileged, it naturally does not itself contain or disclose privileged information.

Nor does the information contained in the March 20 Log fall within any legitimate conception of "confidential" information. The Court made clear, when it heard argument on the parties' competing proposals regarding the definition of Protected Information, that the mere fact that a document had not been previously released to the public did *not* suffice to render the document "confidential." *See, e.g.*, Transcript (July 16, 2014 hearing) ("July 16 Tr.") (reproduced in

⁵ *See* Gretchen Morgenson, *After the Housing Crisis, a Cash Flood and Silence*, New York Times, Feb. 14, 2015, Business Day: Fair Game ("Really? The documents the judge has ordered the government to produce were created three to seven years ago. How could they unsettle the markets now?").

the appendix at Exhibit H) at 10-11. Rather, for information to be considered “confidential” within the meaning of the order, the public release of that information must be likely to cause some type of legally cognizable harm to the producing party or to third parties. *Id. See also In re Violation of Rule 28(d)*, 635 F.3d at 1357-58 (“[T]he party seeking to limit the disclosure of discovery materials must show that specific prejudice or harm will result if no protective order is granted.” (citation and internal quotation marks omitted)); *Lakeland Partners, LLC v. United States*, 88 Fed. Cl. 124, 133 (2009) (party seeking to limit discovery or seeking other protections under Rule 26(c) “must make a particularized factual showing of the harm that would be sustained if the court did not grant a protective order” (citations and internal quotation marks omitted)).⁶ There can be no legitimate reason that the information provided in the March 20 Log meets this standard for protection, and the Government has offered none. Instead, the Government now seeks simply to permit those officials to conduct the public’s business in absolute anonymity and total secrecy. This is not the purpose of the Court’s Protective Order.⁷

⁶ *Cf. Hewlett-Packard Co. v. EMC Corp.*, 330 F. Supp. 2d 1087, 1094 (N.D. Cal. 2004) (courts have classified as “confidential” information that is “of either particular significance or [that] which can be readily identified as either attorney work product or within the scope of the attorney-client privilege.”) (alteration in original). *See also Return Mail, Inc. v. United States*, 107 Fed. Cl. 459, 466 (2012) (reviewing cases in which technical knowledge learned by a previous employee is considered confidential information).

⁷ In addition to failing to contain information that meets the Protective Order’s standards for what *does* qualify as Protected Information, the March 20 Log also falls within the Protective Order’s definition of what *does not* qualify as Protected Information. As noted, the Protective Order clarifies that “discovery material that has been provided to or prepared by any Government agency (which shall include, for these purposes, FHFA) and that is available under applicable law” does not constitute Protected Information. P.O. ¶ 2. Significantly, the analogue to privilege logs in cases arising under the Freedom of Information Act (“FOIA”) – *i.e.*, so-called Vaughn indices, which provide information designed to allow FOIA plaintiffs and reviewing courts to assess an agency’s claim that requested documents are exempt from disclosure – are in most cases considered public documents. *See, e.g., ACLU v. CIA*, 710 F.3d 422, 432 (D.C. Cir. 2013) (“In the usual case, the index is public and relatively specific in describing the kinds of documents the agency is withholding.”).

One need look no farther, for confirmation that the March 20 Log contains no Protected Information, than the fact that that log is in relevant respects essentially identical to the Government's three earlier privilege logs, none of which were designated as protected. Significantly, despite being directly asked by Plaintiffs to identify any information in the March 20 Log meeting the definition of Protected Information and to describe how that information differed in relevant respects from the information provided in its earlier, unprotected logs, the Government failed to provide *any* such explanation. It has simply asserted, without *any* elaboration, that the March 20 Log contains Protected Information.⁸ The Government's silence, in the face of its earlier production of unprotected privilege logs, speaks volumes about the propriety of its sudden desire to shield its privilege logs from disclosure.

2. The fact that neither the March 20 Log nor any information contained within it qualifies as Protected Information ends the relevant analysis under the Protective Order; because the log contains no Protected Information, it cannot be treated as though it does. But it is worth noting that the Government's improper designation of the March 20 Log as protected has had and is continuing to have real-world impacts for Fairholme. Because the March 20 Log has been designated as protected, Fairholme's counsel has not been allowed to share this log with their clients' in-house counsel and corporate personnel, or with litigants in related cases, who can aid in

⁸ In taking this approach, the Government has also utterly failed to comply with the letter or the spirit of its obligation under the Protective Order to attempt to work with Fairholme to resolve the parties' dispute. It bears noting in this regard that the Court explicitly premised its decision to place the burden of persuasion with respect to any such dispute on the receiving party on its expectation that the producing party would explain the basis for its decision to make the Protected Information designation in the first place. *See* July 16 Tr. at 17 ("THE COURT: I mean, you're required to have the discussions. So, *the Government has to lay out all its reasons as to why the material is properly designated under the protective order.*") (emphasis added); *id.* at 41 (THE COURT: ... Please make sure these discussions are meaningful and not just 'I want it, you can't have it' or rather, it should, you know, 'this shouldn't be marked protected; well, tough, it's going to stay that way.'").

assessing the Government's hundreds of assertions of privilege.⁹ The Government's designation of its March 20 Log as Protected Information thus prejudices Fairholme's ability to fully assess the Government's privilege claims and prevents Fairholme's counsel from fully consulting their clients about important questions of legal strategy.

3. Finally, the parties "are not the only people who have a legitimate interest in the record compiled in a legal proceeding." *Citizens First Nat'l Bank of Princeton v. Cincinnati Ins. Co.*, 178 F.3d 943, 944 (7th Cir. 1999). In reviewing the Government's designation of its March 20 Log as protected, the Court must balance the Government's interest in secrecy and the public's right to know. *In re Agent Orange Prod. Liab. Litig.*, 99 F.R.D. 645, 649 (E.D.N.Y. 1983). The parties are entitled under the Constitution to disseminate any information that they obtain during discovery to the full extent permitted by a valid protective order. *Jepson, Inc. v. Makita Elec. Works, Ltd.*, 30 F.3d 854, 858 (7th Cir. 1994).¹⁰ Moreover, "[a]s a general proposition, pretrial discovery must take place in ... public unless compelling reasons exist for denying the public access to the proceedings." *American Tel. & Tel. Co. v. Grady*, 594 F.2d 594, 596 (7th Cir. 1978). The public has an interest even in pretrial proceedings, moreover, "when the government seeks to prohibit disclosure of material ... because disclosure of material which in private

⁹ See RCFC 26(b)(5) (privilege logs to be prepared "in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the claim"). *Accord* FED. R. CIV. P. 26 advisory committee note (1993) ("The party must ... provide sufficient information to enable other parties to evaluate the applicability of the claimed privilege or protection.").

¹⁰ See also *Oklahoma Hosp. Ass'n v. Oklahoma Publ'g Co.*, 748 F.2d 1421, 1424 (10th Cir. 1984) ("While it may be conceded that parties to litigation have a constitutionally protected right to disseminate information obtained by them through the discovery process absent a valid protective order, it does not follow that they can be compelled to disseminate such information.") (citation omitted).

litigation might be protected may be ‘proper and even constructive in order to disseminate political information.’” *In re Agent Orange*, 99 F.R.D. at 649 (quoting Case Comment, *The First Amendment Right to Disseminate Discovery Materials: In re Halkin*, 92 HARV. L. REV. 1550, 1558 (1979)).

Especially in a case, such as this one, that concerns not only important constitutional questions but also challenges to governmental decisions that have critical public policy implications, it is not at all surprising that the public would take an interest in the Government’s efforts to invoke various privileges to shield thousands of relevant documents from scrutiny. But while the Government may not like that fact, it cannot simply resort, without any basis under the Protective Order, to an attempt to cast a shroud of secrecy over even those routine materials, like privilege logs, that document its numerous assertions of privilege.

II. THE GOVERNMENT SHOULD BE DIRECTED TO REDACT ANY ACTUAL PROTECTED INFORMATION FROM FUTURE PRIVILEGE LOGS

The Government is obligated to continue producing privilege logs on a rolling basis, and it appears, based on its recent actions, that, absent a ruling by this Court, it will continue to designate those logs as protected. Therefore, in addition to directing the Government to remove the Protected Information designation from the March 20 Log (and all logs), the Court should direct the Government not to designate future privilege logs as protected unless they contain information that meets the definition of Protected Information, in which case the Government should also produce both an unredacted version of the log and a public, redacted version of the log.

CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court enter an order (1) requiring the Government to remove the “Protected Information” designation from the March 20 Log (and all logs), and (2) directing that the Government should not designate future privilege

logs as protected unless they contain information that meets the definition of Protected Information, in which case the Government should also produce both an unredacted version of the privilege log and a public, redacted version of the log.

Date: May 12, 2015

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Exhibit A

Fairholme Funds, Inc., et al v. United States (No. 13-165, Fed. Cl.)

August 22, 2014

Privilege Log 001 (FHFA)

Log Line ID	Date	From / Author	To / Recipient	CC	Additional Recipients	Description	Privilege Assertion
1	8/8/2008	Russell, Corinne	Dickerson, Chris			Draft press release reflecting FHFA pre-decisional deliberations regarding FHFA regulation of the GSEs and the GSEs' capital requirements	Deliberative Process
2	8/16/2008	Dickerson, Chris	Pearl, David			Document relating to FHFA's regulatory supervision of the GSEs and reflecting pre-decisional deliberations regarding earnings and capital forecast and stress test scenarios for Freddie Mac	Deliberative Process; Bank Examination
3	8/21/2008	Dickerson, Chris	Pollard, Alfred*		Kerr, John; DeLeo, Wanda; Spohn, Jeffrey; Fernandez, Maria; Roberts, Kyle*; Kelly, Austin; Newell, Jamie; Smith, Scott; Tagoe, Naa Awaa	Confidential email providing information to Alfred Pollard* at his request in order to facilitate the provision of legal advice regarding the safety and soundness of the GSEs	Attorney Client
4	8/19/2008	Dickerson, Chris	Pollard, Alfred*			Confidential draft document provided to Alfred Pollard* in order to facilitate the provision of legal advice and reflecting FHFA pre-decisional deliberations regarding the financial and governance issues of Fannie Mae	Attorney Client; Deliberative Process; Bank Examination
5	8/7/2008	Dickerson, Chris	DeLeo, Wanda; Tagoe, Naa Awaa			Letter from Freddie Mac to OFHEO as relating to OFHEO's regulatory capacity regarding response to OFHEO Supervisory Letter as to Freddie Mac's financial condition	Bank Examination
6	7/29/2008	Dickerson, Chris	DeLeo, Wanda; Tagoe, Naa Awaa; Smith, Scott; Newell, Jamie; Roberts, Kyle*; Fernandez, Maria		Bostrom, Robert*; Pollard, Alfred*; Weiss, Jerry; Spohn, Jeffrey; Brereton, Peter; MacKenzie, Kevin*	Email communication between Freddie Mac and FHFA providing information necessary for FHFA to provide regulatory review and approval regarding Freddie Mac's draft SEC Form 10Q	Bank Examination
7	7/17/2008	Dickerson, Chris	Satriano, Nicholas; Stauffer, Lawrence;			Confidential draft SEC Form 10 prepared by Freddie Mac and provided to OFHEO in its regulatory capacity for review and approval	Bank Examination
8	7/12/2008	Dickerson, Chris	Fernandez, Maria		Corona, Stephen; Beckles, Erin; Coras, Peter; Keyes, Robert; Kerr, John; Spohn, Jeffrey	Email communication among senior FHFA staff reflecting pre-decisional deliberations relating to the GSE liquidity positions	Deliberative Process; Bank Examination
9	10/10/2008	Dickerson, Chris	Smith, Scott; Johnson, Mary			Confidential draft SEC Form 8K prepared by Freddie Mac and provided to FHFA in its regulatory capacity for review and approval	Bank Examination
10	9/16/2008	Dickerson, Chris	Felt, David*;			Draft Q/A relating to the conservatorship and SPSPAs; reflecting Freddie Mac counsel Kevin MacKenzie's legal advice and provided for David Felt*'s legal advice and FHFA review to assist in pre-decisional deliberations	Attorney Client; Deliberative Process
11	7/2/2008	Roberts, Kyle*	Dickerson, Chris;			Draft memorandum prepared by Kyle Roberts* and reflecting legal advice and OFHEO pre-decisional deliberations regarding supervisory issues and examination planning and execution regarding the GSEs	Attorney Client; Deliberative Process; Bank Examination
12	7/15/2008	Lawler, Patrick	Lockhart, James; DeMarco, Edward; Pollard, Alfred*; Felt, David*; Dickerson, Chris; Brereton, Peter; DeLeo, Wanda; Smith, Scott; Johnson, Mary;			Draft document created by OFHEO, reflecting OFHEO pre-decisional deliberations in its regulatory capacity, and provided for Alfred Pollard* and David Felt*'s legal advice regarding types of capital, capital requirements, and capital classification for the GSEs	Attorney Client; Deliberative Process; Bank Examination
13	8/8/2008	Zaenger, Eileen	DeLeo, Wanda; Dickerson, Chris; Kerr, John; Lawler, Patrick; Newell, Jamie; Pearl, David; Roberts, Kyle*; Smith, Scott; Spohn, Jeffrey; Tagoe, Naa Awaa; Johnson, Mary; Lockhart, James; DeMarco, Edward;	Zaenger, Eileen; Jacobsohn, Michael; McNicholas, John; McKinney, Daniel; Nelson, Adam; Stofferson, Robert;		Confidential internal meeting notes containing agency advisory opinions, recommendations, and pre-decisional deliberations for the purpose of regulatory oversight regarding Freddie Mac capital requirements	Deliberative Process; Bank Examination

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14	8/8/2008	Zaenger, Eileen	DeLeo, Wanda; Dickerson, Chris; Kerr, John; Lawler, Patrick; Newell, Jamie; Pearl, David; Roberts, Kyle*; Smith, Scott; Spohn, Jeffrey; Tagoe, Naa Awaa; Johnson, Mary; Lockhart, James; DeMarco, Edward;	Zaenger, Eileen; Jacobsohn, Michael; McNicholas, John; McKinney, Daniel; Nelson, Adam; Stofferason, Robert;		Confidential internal meeting notes containing agency advisory opinions, recommendations, and pre-decisional deliberations for the purpose of regulatory oversight regarding Freddie Mac capital requirements	Deliberative Process; Bank Examination
15	8/8/2008	Wambeke, Carol A.	Newell, Jamie	Aboff, Bruce; Dickerson, Chris; Kwartunas, Deirdre; Singh, Manoj; Federico, Peter; Fishman, Robert; Bitsberger, Timothy		Email communication between OFHEO and Freddie Mac requesting information required by OFHEO in order to conduct examination of Freddie Mac's liquidity management	Bank Examination
16	8/8/2008	Roberts, Kyle*	Roberts, Toi; Dickerson, Chris	Spohn, Jeffrey; Kerr, John; DeLeo, Wanda; Anderson, Philip; Stebick, Diana; Spruill, Sherry; Johnson, Lola; Walker, Jeffrey; Phillips, Steve; Paulin, Anne; Leonard, Catherine; Markowitz, Alan; Murphy, Stephen; Felt, David*; Wright, Frank*		Draft memorandum prepared by Kyle Roberts* and reflecting legal advice and OFHEO pre-decisional deliberations regarding supervisory issues and examination planning and execution regarding the GSEs	Attorney Client; Deliberative Process; Bank Examination
17	8/8/2008	Russell, Corinne	Lockhart, James; DeMarco, Edward; Pollard, Alfred*; Dickerson, Chris	Brereton, Peter; Hanley, Joanne; Mullin, Stefanie;		Draft press release reflecting FHFA pre-decisional deliberations and provided for Alfred Pollard*'s legal advice regarding FHFA regulation of the GSEs and the GSEs' capital requirements	Attorney Client; Deliberative Process; Bank Examination
18	8/29/2008	Kwartunas, Deirdre	Zhang, Min; Sugarman, Ron; Calhoun, Peter; Barabasz, Andrew; Lockhart, James; DeMarco, Edward; Spohn, Jeffrey; Kerr, John; Newell, Jamie; Roberts, Kyle*; Eldarrat, Abdalla; Eldarrat, Christine; Lintecum, Lisa; Phillips, Steve; Pollard, Alfred*; Tagoe, Naa Awaa; Smith, Scott; Dickerson, Chris; Keyes, Rober; Johnson, Melinda; DeLeo, Wanda; Satriano, Nicholas; Stauffer, Lawrence; Pearl, David; Akuete, Nii Ama; Astrada, Albert; Conger, Nicholas; Eldarrat, Abdalla; Friedman, Timothy; Heller, Timothy; Kwartunas, Deirdre; Millman, Phillip; Stofferason, Robert; Walker, Jeffrey; Woody, Adam (Brock); Eller, Gregory; Fernandez, Maria; Mehta, Vikas			Confidential internal meeting notes containing agency advisory opinions, recommendations, and pre-decisional deliberations for the purpose of regulatory oversight regarding Freddie Mac market risk update	Deliberative Process; Bank Examination

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19	8/29/2008	Kvartunas, Deirdre	Zhang, Min; Sugarman, Ron; Calhoun, Peter; Barabasz, Andrew; Lockhart, James; DeMarco, Edward; Spohn, Jeffrey; Kerr, John; Newell, Jamie; Roberts, Kyle*; Eldarrat, Abdalla; Eldarrat, Christine; Lintecum, Lisa; Phillips, Steve; Pollard, Alfred*; Tagoe, Naa Awaa; Smith, Scott; Dickerson, Chris; Keyes, Robert; Johnson, Melinda; DeLeo, Wanda; Satriano, Nicholas; Stauffer, Lawrence; Pearl, David; Akuete, Nii Ama; Astrada, Albert; Conger, Nicholas; Eldarrat, Abdalla; Friedman, Timothy; Heller, Timothy; Kvartunas, Deirdre; Millman, Phillip; Stofferson, Robert; Walker, Jeffrey; Woody, Adam (Brock); Eller, Gregory; Fernandez, Maria; Mehta, Vikas			Confidential internal meeting notes containing agency advisory opinions, recommendations, and pre-decisional deliberations for the purpose of regulatory oversight regarding Fannie Mae market risk update	Deliberative Process; Bank Examination
20	8/21/2008	Kerr, John	Dickerson, Chris;	Spohn, Jeffrey; DeLeo, Wanda; Smith, Scott; Tagoe, Naa Awaa; Roberts, Kyle*; Fernandez, Maria; Kelly, Austin; Newell, Jamie; Eller, Gregory		Draft Supervisory Letter prepared by OFHEO and reflecting OFHEO pre-decisional deliberations and recommendations in its regulatory capacity regarding Fannie Mae financial condition and credit quality	Deliberative Process; Bank Examination
21	8/18/2008	Kerr, John	Eller, Gregory; Kvartunas, Deirdre; Spohn, Jeffrey; Tagoe, Naa Awaa; Smith, Scott; Roberts, Kyle*; Kelly, Austin; Fernandez, Maria	DeLeo, Wanda; Newell, Jamie; Dickerson, Chris		Confidential draft document reflecting FHFA pre-decisional deliberations in light of its supervisory authority and provided for Kyle Robert*'s legal advice and review regarding the financial and governance issues of Fannie Mae	Attorney Client; Deliberative Process; Bank Examination
22	9/16/2008	Newell, Jamie	Kerr, John; Reid, Leonard; Dickerson, Chris	!MARKET RISK TEAM <!marketriskteam@ofheo.gov>, Garner, Gregory	Lockhart, James; DeMarco, Edward; DeLeo, Wanda; Lawler, Patrick; Spohn, Jeffrey; Pollard, Alfred*; Dickerson, Chris; Pearl, David; Roberts, Kyle*; Fernandez, Maria; Kelly, Austin; Newell, Jamie; Smith, Scott; Tagoe, Naa Awaa	Email communication among senior FHFA staff reflecting FHFA internal pre-decisional deliberations and opinions relating to its supervisory authority of the GSEs regarding collateral requirements for the GSEs	Deliberative Process; Bank Examination
23	10/2/2008	McNicholas, John	Oliver, Bruce; Wambeke, Carol; Kellermann, David; Moffett, David; Rindler, Don; Weiss, Jerry; Amato, Joseph; Nicholas, John; Johnson, Mary; Nelson, Adam; Harvey, Pamela; Smith, Scott; Brun, Stephan; Zaenger, Eileen; Reid, Leonard; Dickerson, Chris			Communication from FHFA to Freddie Mac relating to its regulatory supervision of Freddie Mac regarding proposed capital classification requirements	Bank Examination
24	10/2/2008	McNicholas, John	Nelson, Adam; Goldblatt, Alan; Quinn, William; Senhauser, William; Greener, Chuck; Benson, David; Hisey, David; McNicholas, John; Lee, Karen; Johnson, Mary; Shaw, Michael; Smith, Scott; Wang, Thomas; Zaenger, Eileen; Reid, Leonard; Dickerson, Chris; Williams, Michael; Lu, Curtis; Allison, Herbert			Communication from FHFA to Fannie Mae relating to its regulatory supervision of Fannie Mae regarding proposed capital classification requirements	Bank Examination

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25	10/29/2008	Covino, Rocco*	Dickerson, Chris;	MacKenzie, Kevin*; Felt, David*; Roderer, David*; Rodgers, Richard*; Bostrom, Robert*	MacKenzie, Kevin*; Felt, David*; Roderer, David*; Rodgers, Richard*; Bostrom, Robert*	Email chain between FHFA and counsel for Freddie Mac requesting information necessary for counsel to render legal advice regarding compliance with provisions of the SPSPA	Attorney Client; Bank Examination
26	10/29/2008	Covino, Rocco*	Dickerson, Chris			Draft letter from Fannie Mae to FHFA providing information necessary for FHFA to provide regulatory supervision of the GSEs regarding interpreting provisions of the SPSPAs	Bank Examination
27	8/18/2008	Dickerson, Chris	Dickerson, Chris			Confidential document prepared for the purpose of FHFA regulatory supervision regarding FHFA examinations of both GSEs	Bank Examination
28	9/27/2013	Lawler, Patrick	Wright, Frank*		Ugoletti, Mario; Pollard, Alfred*; Laponsky, Mark*; Greenlee, Jon; Burns, Meg; Spohn, Jeffrey; Newell, Jamie; Satriano, Nicholas	Email forwarding communication among senior FHFA staff reflecting FHFA internal pre-decisional deliberations and requesting counsel Mark Laponsky*'s legal advice regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
29	7/16/2008	McNicholas, John	Comenetz, Sandy; DeLeo, Wanda; Dickerson, Chris; Eldarrat, Christine; Fernandez, Maria; Kelly, Austin; Kerr, John; Kwartunas, Deirdre; Lawler, Patrick; Loeffler, Thomas; Newell, Jamie; Pearl, David; Roberts, Kyle*; Smith, Scott; Spohn, Jeffrey; Tagoe, Naa Awaa; Whiteside, Carole			Confidential draft supervisory letter from OFHEO in their capacity as regulator to Fannie Mae containing agency opinions, recommendations and pre-decisional deliberations regarding Directed Capital Surplus and Dividend Decisions	Deliberative Process; Bank Examination
30	7/16/2008	McNicholas, John	Comenetz, Sandy; DeLeo, Wanda; Dickerson, Chris; Eldarrat, Christine; Fernandez, Maria; Kelly, Austin; Kerr, John; Kwartunas, Deirdre; Lawler, Patrick; Loeffler, Thomas; Newell, Jamie; Pearl, David; Roberts, Kyle*; Smith, Scott; Spohn, Jeffrey; Tagoe, Naa Awaa; Whiteside, Carole			Confidential draft supervisory letter from OFHEO, in their capacity as regulator, to Freddie Mac containing agency opinions, recommendations and pre-decisional deliberations regarding Directed Capital Surplus and Dividend Decisions	Deliberative Process; Bank Examination
31	7/30/2008	Dickerson, Chris	DeLeo, Wanda; Lawler, Patrick			Confidential document created by FHFA relating to its regulatory supervision of Fannie Mae regarding stress tests and capital forecast for Fannie Mae	Bank Examination
32	8/21/2008	Calhoun, Peter	Lockhart, James	DeMarco, Edward; Dickerson, Chris; DeLeo, Wanda; Tagoe, Naa Awaa; Lawler, Patrick;		Document prepared by FHFA relating to its regulatory supervision of the GSEs and reflecting pre-decisional deliberations regarding earnings and capital forecast and stress test scenarios for Freddie Mac	Deliberative Process; Bank Examination
33	8/24/2008	Calhoun, Peter	Lockhart, James; DeMarco, Edward; Dickerson, Chris; DeLeo, Wanda	Lawler, Patrick; Smith, Scott; Kelly, Austin; Tagoe, Naa Awaa; Suadwa, Akwasi;		Document prepared by FHFA relating to its regulatory supervision of the GSEs regarding earnings and capital forecast and stress test scenarios for both GSEs	Bank Examination
34	8/27/2008	Pollard, Alfred*	Lockhart, James; Dickerson, Chris; Spohn, Jeffrey; Kerr, John; Roberts, Kyle*; Lawler, Patrick	Felt, David*;		Confidential draft document reflecting Alfred Pollard*'s legal advice and agency pre-decisional deliberations regarding the financial condition and governance issues of Fannie Mae	Attorney Client; Deliberative Process; Bank Examination
35	8/9/2012	DeLeo, Wanda	Griffin Jr., James	Graham, Fred C.; Satriano, Nicholas	Ugoletti, Mario; Brown, Jan; DeMarco, Edward; Pollard, Alfred*; Laponsky, Mark*; Spohn, Jeffrey; Greenlee, Jon; Lawler, Patrick; DeLeo, Wanda	Email communication between senior FHFA staff reflecting request for counsels Alfred Pollard* and Mark Laponsky*'s legal advice on proposed contract and reflecting FHFA internal pre-decisional deliberations regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
36	8/14/2012	Griffin Jr., James	Satriano, Nicholas			Confidential email containing agency advisory opinions, recommendations and pre-decisional deliberations regarding proposed terms for the third amendment to the SPSPA	Deliberative Process

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37	8/13/2012	Griffin Jr., James	Satriano, Nicholas		Ugoletti, Mario; Brown, Jan; DeMarco, Edward; Pollard, Alfred*; Laponsky, Mark*; Spohn, Jeffrey; Greenlee, Jon; Lawler, Patrick; DeLeo, Wanda	Email communication between senior FHFA staff reflecting request for counsels Alfred Pollard* and Mark Laponsky*'s legal advice on proposed contract and reflecting FHFA internal pre-decisional deliberations regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
38	8/9/2012	Griffin Jr., James	DeLeo, Wanda	Graham, Fred C.; Satriano, Nicholas	Ugoletti, Mario; Brown, Jan; DeMarco, Edward; Pollard, Alfred*; Laponsky, Mark*; Spohn, Jeffrey; Greenlee, Jon; Lawler, Patrick	Email communication between senior FHFA staff reflecting request for counsels Alfred Pollard* and Mark Laponsky*'s legal advice on proposed contract and reflecting FHFA internal pre-decisional deliberations regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
39	8/13/2012	Satriano, Nicholas	Griffin Jr., James		Ugoletti, Mario ; Brown, Jan; DeMarco, Edward; Pollard, Alfred*; Laponsky, Mark*; Spohn, Jeffrey; Greenlee, Jon; Lawler, Patrick; DeLeo, Wanda	Email communication between senior FHFA staff reflecting request for counsels Alfred Pollard* and Mark Laponsky*'s legal advice on proposed contract and reflecting FHFA internal pre-decisional deliberations regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
40	7/29/2011	Satriano, Nicholas	Laponsky, Mark*		Lewis, Stephen; Jordan, James; Griffin Jr., James; MacKenzie, Kevin*; Balsawer, Peggy; Dye, John*	Confidential email chain between FHFA counsel and senior FHFA staff requesting and providing counsel's legal advice regarding draft disclosure statements made on behalf of Fannie Mae relating to mortgage securities lawsuits	Attorney Client
41	6/12/2012	Ugoletti, Mario	Pollard, Alfred*; Laponsky, Mark*; Lawler, Patrick; Greenlee, Jon; Burns, Meg; Spohn, Jeffrey; Newell, Jamie; Satriano, Nicholas			Email communication among senior FHFA staff reflecting FHFA internal pre-decisional deliberations and requesting counsel Mark Laponsky*'s legal advice regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
42	9/4/2008	Satriano, Nicholas	Calhoun, Peter; Suadwa, Akwasi	DeLeo, Wanda; Smith, Scott		Confidential spreadsheet prepared by OFHEO for the purpose of FHFA regulatory supervision regarding stress tests of the GSEs	Bank Examination
43	10/31/2008	Satriano, Nicholas	Smith, Scott		Stauffer, Lawrence; Eller, Gregory; DeLeo, Wanda	RM: Email communication amongst senior FHFA staff reflecting FHFA pre-decisional deliberations regarding valuation assessment related to potential Freddie Mac draws under the SPSPA	Deliberative Process
44	7/12/2008	Tagoe, Naa Awaa	DeMarco, Edward; Calhoun, Peter	Dickerson, Chris		Document prepared by OFHEO in its capacity as regulatory for the purpose of providing supervisory recommendations to the GSEs regarding minimum capital requirements	Bank Examination
45	8/16/2012	Dunckel, Denise	DeMarco, Edward; Ugoletti, Mario			Confidential draft press release reflecting agency pre-decisional opinions and deliberations regarding public statements made on behalf of FHFA related to the third amendment to the SPSPA	Deliberative Process
46	8/16/2012	Dunckel, Denise	Ugoletti, Mario; DeMarco, Edward			Email communications between senior FHFA staff providing agency pre-decisional opinions and deliberations regarding language in draft press release about the third amendment to the SPSPA	Deliberative Process
47	8/16/2012	Ugoletti, Mario	DeMarco, Edward; Dunckel, Denise			Email communications between senior FHFA staff providing agency pre-decisional opinions and deliberations regarding language in draft press release about the third amendment to the SPSPA	Deliberative Process
48	8/16/2012	Dunckel, Denise	DeMarco, Edward; Ugoletti, Mario			Confidential draft press release reflecting agency pre-decisional opinions and deliberations regarding public statements made on behalf of FHFA related to the third amendment to the SPSPA	Deliberative Process
49	8/13/2012	Ugoletti, Mario	Brown, Jan; DeMarco, Edward; Pollard, Alfred*; Laponsky, Mark*; Spohn, Jeffrey; Greenlee, Jon; Lawler, Patrick; DeLeo, Wanda; Satriano, Nicholas			Email communication between senior FHFA staff reflecting request for counsels Alfred Pollard* and Mark Laponsky*'s legal advice on proposed contract and reflecting FHFA internal pre-decisional deliberations regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process

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50	8/10/2012	DeLeo, Wanda	Brown, Jan; Ugoletti, Mario; DeMarco, Edward; Pollard, Alfred*; Laponsky, Mark*; Spohn, Jeffrey; Greenlee, Jon; Lawler, Patrick; Satriano, Nicholas			Email communication between senior FHFA staff reflecting request for counsels Alfred Pollard* and Mark Laponsky*'s legal advice on proposed contract and reflecting FHFA internal pre-decisional deliberations regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
51	8/9/2012	Brown, Jan	DeMarco, Edward		Brown, Jan; DeMarco, Edward	Email communication between senior FHFA staff reflecting FHFA internal pre-decisional deliberations regarding proposed terms for the third amendment to the SPSPA	Deliberative Process
52	8/10/2012	Brown, Jan	Ugoletti, Mario; DeMarco, Edward; Pollard, Alfred*; Laponsky, Mark*; Spohn, Jeffrey; Greenlee, Jon; Lawler, Patrick; DeLeo, Wanda; Satriano, Nicholas			Email communication between senior FHFA staff reflecting request for counsels Alfred Pollard* and Mark Laponsky*'s legal advice on proposed contract and reflecting FHFA internal pre-decisional deliberations regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
53	8/9/2012	Laponsky, Mark*	Ugoletti, Mario; DeMarco, Edward; Pollard, Alfred*; Spohn, Jeffrey; Greenlee, Jon; Lawler, Patrick; DeLeo, Wanda; Satriano, Nicholas	Brown, Jan;		Email communication between senior FHFA staff reflecting request for counsels Alfred Pollard* and Mark Laponsky*'s legal advice on proposed contract and reflecting FHFA internal pre-decisional deliberations regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
54	8/8/2012	Ugoletti, Mario	DeMarco, Edward			Email communication among senior FHFA staff reflecting FHFA internal pre-decisional deliberations regarding proposed terms for the Third Amendment to the SPSPA	Deliberative Process
55	6/3/2012	Pollard, Alfred*	DeMarco, Edward; Greenlee, Jon	Laponsky, Mark*;		Confidential draft document reflecting Alfred Pollard*'s legal advice and FHFA pre-decisional deliberations as to draft language for communication with Treasury regarding the GSE requested draws	Attorney Client; Deliberative Process
56	8/17/2012	DeMarco, Edward	Ugoletti, Mario; Brereton, Peter			RM: Email communications between Edward DeMarco and senior FHFA staff reflecting internal pre-decisional agency deliberations regarding draft public statements on behalf of FHFA about the third amendment to the SPSPA	Deliberative Process
57	8/17/2012	DeMarco, Edward	Pollard, Alfred*			Confidential draft press release provided to Alfred Pollard* for legal advice and review and reflecting FHFA pre-decisional opinions and deliberations re: public statements made on behalf of FHFA related to the third amendment to the SPSPA	Attorney Client; Deliberative Process
58	8/16/2012	DeMarco, Edward	Ugoletti, Mario; Dunkel, Denise			Email communication among senior FHFA staff reflecting FHFA internal pre-decisional deliberations and opinions regarding potential language in proposed draft SPSPA amendment	Deliberative Process
59	8/16/2012	DeMarco, Edward	Dunkel, Denise; Ugoletti, Mario			Email communications between senior FHFA staff reflecting internal pre-decisional deliberations and opinions regarding draft press release made on behalf of FHFA related to the third amendment to the SPSPA	Deliberative Process
60	8/17/2012	Brereton, Peter	Ugoletti, Mario			RM: Email communications between Edward DeMarco and senior FHFA staff reflecting internal pre-decisional agency deliberations regarding draft public statements on behalf of FHFA about the third amendment to the SPSPA	Deliberative Process
61	8/17/2012	DeMarco, Edward	Ugoletti, Mario; Brereton, Peter			RM: Email communications between Edward DeMarco and senior FHFA staff reflecting internal pre-decisional agency deliberations regarding draft public statements on behalf of FHFA about the third amendment to the SPSPA	Deliberative Process
62	8/16/2012	DeMarco, Edward	Dunkel, Denise; Ugoletti, Mario			Email communications between senior FHFA staff reflecting internal pre-decisional deliberations and opinions regarding draft press release made on behalf of FHFA related to the third amendment to the SPSPA	Deliberative Process
63	8/15/2012	Dunkel, Denise	Ugoletti, Mario			Email communications between senior FHFA staff reflecting internal pre-decisional deliberations and opinions regarding draft press release made on behalf of FHFA related to the third amendment to the SPSPA	Deliberative Process

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64	8/13/2012	Greenlee, Jon	Ugoletti, Mario		Brown, Jan; DeMarco, Edward; Pollard, Alfred*; Laponsky, Mark*; Spohn, Jeffrey; Lawler, Patrick; DeLeo, Wanda	Email communication between senior FHFA staff forwarding the request for counsels Alfred Pollard* and Mark Laponsky*'s legal advice and reflecting FHFA internal pre-decisional deliberations regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
65	6/11/2012	Lawler, Patrick	Ugoletti, Mario		Pollard, Alfred*; Laponsky, Mark*; Greenlee, Jon; Burns, Meg; Spohn, Jeffrey; Newell, Jamie; Satriano, Nicholas	Email communication among senior FHFA staff reflecting FHFA internal pre-decisional deliberations and the request for counsel Mark Laponsky*'s legal advice regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
66	6/11/2012	Laponsky, Mark*	Ugoletti, Mario			Confidential email transmitting attached draft document reflecting Mark Laponsky*'s legal advice and FHFA pre-decisional deliberations as to proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
67	6/11/2012	Laponsky, Mark*	Ugoletti, Mario			Confidential draft document reflecting Mark Laponsky*'s legal advice and FHFA pre-decisional deliberations as to proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
68	6/11/2012	Laponsky, Mark*	Ugoletti, Mario; Pollard, Alfred*; Lawler, Patrick; Greenlee, Jon; Burns, Meg; Spohn, Jeffrey; Newell, Jamie; Satriano, Nicholas			Email communication among senior FHFA staff reflecting FHFA internal pre-decisional deliberations and requesting and providing counsel Mark Laponsky*'s legal advice regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
69	6/11/2012	Lawler, Patrick	Ugoletti, Mario		Pollard, Alfred*; Laponsky, Mark*; Greenlee, Jon; Burns, Meg; Spohn, Jeffrey; Newell, Jamie; Satriano, Nicholas	Email communication among senior FHFA staff reflecting FHFA internal pre-decisional deliberations and the request for counsel Mark Laponsky*'s legal advice regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
70	6/11/2012	Newell, Jamie	Ugoletti, Mario; Pollard, Alfred*; Laponsky, Mark*; Lawler, Patrick; Greenlee, Jon; Burns, Meg; Spohn, Jeffrey; Satriano, Nicholas			Email communication among senior FHFA staff reflecting FHFA internal pre-decisional deliberations and requesting counsel Mark Laponsky*'s legal advice regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
71	6/4/2012	DeMarco, Edward	Ugoletti, Mario		Pollard, Alfred*; Greenlee, Jon; Laponsky, Mark*	Confidential email chain forwarding Alfred Pollard*'s legal advice and agency pre-decisional deliberations regarding draft language for communication with Treasury related to GSE draws under the SPSPA	Attorney Client; Deliberative Process
72	6/4/2012	Collender, Robert	Lawler, Patrick; Ugoletti, Mario; Taylor, Mary Ellen; Bailey, Ellen*			Confidential draft report reflecting Ellen Bailey*'s legal advice and FHFA pre-decisional deliberations as to Treasury's support for the GSEs including the SPSPAs	Attorney Client; Deliberative Process
73	6/4/2012	Collender, Robert	Lawler, Patrick; Ugoletti, Mario; Taylor, Mary Ellen; Bailey, Ellen*			Confidential draft report reflecting Ellen Bailey*'s legal advice and FHFA pre-decisional deliberations as to Treasury's support for the GSEs including the SPSPAs	Attorney Client; Deliberative Process
74	6/1/2012	Newell, Jamie	Ugoletti, Mario; Greenlee, Jon; DeLeo, Wanda; Spohn, Jeffrey			Confidential email prepared for the purpose of FHFA regulatory supervision regarding GSE retained portfolio SPSPA compliance forecast	Bank Examination
75	6/1/2012	Collender, Robert	Lawler, Patrick; Bailey, Ellen*; Ugoletti, Mario; Taylor, Mary Ellen	Laponsky, Mark*		Confidential draft report provided for Ellen Bailey* and Mark Laponsky*'s legal advice and FHFA pre-decisional deliberations as to Treasury's support for the GSEs including the SPSPAs	Attorney Client; Deliberative Process
76	6/1/2012	Collender, Robert	Lawler, Patrick; Bailey, Ellen*; Ugoletti, Mario; Taylor, Mary Ellen	Laponsky, Mark*		Confidential draft report provided for Ellen Bailey* and Mark Laponsky*'s legal advice and FHFA pre-decisional deliberations as to Treasury's support for the GSEs including the SPSPAs	Attorney Client; Deliberative Process
77	4/3/2012	Smith, Scott	Lawler, Patrick; Ugoletti, Mario	Seiler, Robin		RM: Email communication among senior FHFA staff reflecting FHFA pre-decisional deliberations regarding raising GSE guarantee fees	Deliberative Process
78	4/3/2012	Smith, Scott	Lawler, Patrick; Ugoletti, Mario	Seiler, Robin		Presentation slides prepared by Fannie Mae and Freddie Mac at the request of FHFA to assist in FHFA's regulatory supervision of the GSEs as to reserve fund draws and surplus and guarantee fee analysis	Bank Examination

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79	1/18/2012	DeMarco, Edward	Ugoletti, Mario; Burns, Meg			Confidential draft internal pre-decisional presentation providing FHFA advisory opinions, recommendations, and deliberations prepared for meeting with Treasury to discuss the mortgage market issues and the SPSPAs	Deliberative Process
80	1/3/2012	DeMarco, Edward	Ugoletti, Mario			Email communication between Edward DeMarco and Mario Ugoletti providing pre-decisional deliberative opinion on discussions with Treasury concerning SPSPAs with the conservatorships	Deliberative Process
81	8/17/2012	Ugoletti, Mario	Brereton, Peter; DeMarco, Edward			RM: Email communications between Edward DeMarco and senior FHFA staff reflecting internal pre-decisional agency deliberations regarding draft public statements on behalf of FHFA about the third amendment to the SPSPA	Deliberative Process
82	8/16/2012	Ugoletti, Mario	DeMarco, Edward; Dunckel, Denise			Email communications between senior FHFA staff reflecting internal pre-decisional deliberations and opinions regarding draft press release made on behalf of FHFA related to the third amendment to the SPSPA	Deliberative Process
83	8/16/2012	Ugoletti, Mario	Dunckel, Denise			Email communications between senior FHFA staff reflecting internal pre-decisional deliberations and opinions regarding draft press release made on behalf of FHFA related to the third amendment to the SPSPA	Deliberative Process
84	8/15/2012	Ugoletti, Mario	Dunckel, Denise			Draft press release shared between senior FHFA staff reflecting internal pre-decisional deliberations and opinions regarding third amendment to the SPSPA	Deliberative Process
85	8/13/2012	Ugoletti, Mario	Greenlee, Jon	Brown, Jan	DeMarco, Edward; Pollard, Alfred*; Laponsky, Mark*; Spohn, Jeffrey; Lawler, Patrick; DeLeo, Wanda; Satriano, Nicholas	Email communication between senior FHFA staff forwarding the request for counsels Alfred Pollard* and Mark Laponsky*'s legal advice and reflecting FHFA internal pre-decisional deliberations regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
86	8/13/2012	Ugoletti, Mario	Brown, Jan; DeMarco, Edward; Pollard, Alfred*; Laponsky, Mark*; Spohn, Jeffrey; Greenlee, Jon; Lawler, Patrick; DeLeo, Wanda; Satriano, Nicholas			Email communication between senior FHFA staff requesting Alfred Pollard* and Mark Laponsky*'s legal advice and reflecting FHFA internal pre-decisional deliberations regarding proposed terms for the third amendment to the SPSPA	Attorney Client; Deliberative Process
87	6/5/2012	Ugoletti, Mario	Pollard, Alfred*; Laponsky, Mark*; Lawler, Patrick; Greenlee, Jon; Burns, Meg; Spohn, Jeffrey; Newell, Jamie; Satriano, Nicholas			Email communication among senior FHFA staff reflecting FHFA internal pre-decisional deliberations and requesting counsel Mark Laponsky*'s legal advice regarding proposed terms for the Third Amendment to the SPSPA	Attorney Client; Deliberative Process
88	4/19/2012	Ugoletti, Mario	Greenlee, Jon; DeLeo, Wanda; Burns, Meg; Spohn, Jeffrey	Brown, Jan		Email communication among senior FHFA staff reflecting FHFA internal pre-decisional deliberations and opinions regarding potential portfolio covenant change to the SPSPAs	Deliberative Process
89	4/12/2012	Ugoletti, Mario	Greenlee, Jon; DeLeo, Wanda; Burns, Meg; Spohn, Jeffrey	Brown, Jan		Confidential internal pre-decisional draft document containing agency advisory opinions, recommendations and deliberations regarding potential change to provisions of the SPSPA related to asset disposition	Deliberative Process
90	10/14/2008	Doyle, Mary B	DeLeo, Wanda; Tagoe, Naa Awa	Hisey, David; Caracostis, Vicki		Confidential draft document prepared by Fannie Mae at the request of FHFA in order for FHFA to conduct regulatory oversight of Fannie Mae regarding financial and stress forecasting	Bank Examination
91	7/12/2008	DeMarco, Edward	Lockhart, James;			Email chain between senior FHFA staff reflecting regulatory analysis and pre-decisional deliberations of minimum capital levels for Freddie Mac and Fannie Mae	Deliberative Process; Bank Examination
92	9/5/2008	Dickerson, Chris	Lockhart, James			Confidential internal memorandum from C. Dickerson to J. Lockhart containing agency advisory opinions, recommendations and pre-decisional deliberations prepared in light of regulatory oversight regarding capital evaluation of the GSEs	Deliberative Process; Bank Examination
93	6/27/2008	Senhauser, Bill*	Dickerson, Chris			Confidential letter from Fannie Mae to OFHEO providing information in connection with regulatory oversight of Fannie Mae regarding housing and community development credit risk review	Bank Examination

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94	00/00/2008	OFHEO	File			Excerpts from meeting notes providing information prepared at the request of OFHEO in connection with regulatory oversight of Fannie Mae and reflecting pre-decisional deliberations regarding housing and community development credit risk review for 2Q 2008	Deliberative Process; Bank Examination
95	8/27/2008	Musser, Patricia	File		Huggins, Carolyn; Damron, Julie; Corona, Stephen; Eldarrat, Christine	Meeting notes and attached supporting documents containing agency advisory opinions, recommendations and pre-decisional deliberations in relation to regulatory oversight of Fannie Mae regarding borrower assistance and loss mitigation tracking	Deliberative Process; Bank Examination
96	6/9/2008	Lockhart, James	Mudd, Daniel	Ashley, Stephen; Senhauser, Bill*		Confidential letter from OFHEO to Fannie Mae providing agency recommendations in connection with regulatory oversight of Fannie Mae regarding capital requirement classification	Bank Examination
97	8/22/2008	Zaenger, Eileen	McNicholas, John			Confidential memorandum prepared by FHFA in connection with regulatory oversight of Fannie Mae and reflecting pre-decisional deliberations regarding minimum capital requirement compliance and capital projections	Deliberative Process; Bank Examination
98	7/00/2008	Fannie Mae	OFHEO			Confidential presentation containing information prepared at the request of FHFA in connection with regulatory oversight regarding Fannie Mae corporate financial outlook and forecasts	Bank Examination
99	7/28/2008	Dickerson, Chris	Levin, Robert	Senhauser, Bill*; Niculescu, Peter; Benson, David		Confidential Supervisory Letter from FHFA to Robert Levin (Fannie Mae) requesting information in connection with regulatory oversight regarding FHFA's examination of Fannie Mae's liquidity management	Bank Examination
100	8/15/2008	Lockhart, James	Mudd, Daniel	Swad, Steve; Senhauser, Bill*; Dickerson, Chris; Kerr, John; Tagoe, Naa Awaa		Confidential Supervisory Letter from FHFA to Fannie Mae for the purpose of regulatory oversight regarding Fannie Mae's Q2 2008 exposure to risk	Bank Examination
101	4/9/2008	Kerr, John	File			Confidential Risk Assessment Narrative prepared by OFHEO providing supervisory analysis and recommendations regarding Fannie Mae's exposure to credit risk	Bank Examination
102	00/00/2008	OFHEO	File			Excerpt from meeting notes providing OFHEO's regulatory analysis, recommendations and pre-decisional deliberations in relation to oversight of Fannie Mae regarding credit risks	Deliberative Process; Bank Examination
103	00/00/2008	OFHEO	File			Excerpt from meeting notes providing OFHEO's analysis, recommendations and pre-decisional deliberations in relation to oversight of Fannie Mae regarding g-fee modeling	Deliberative Process; Bank Examination
104	4/8/2008	Molleur, Celeste	File			Confidential internal pre-decisional meeting notes providing OFHEO's advisory opinions, recommendations and deliberations regarding examination of Fannie Mae's Applied Pricing Models/Processes	Deliberative Process; Bank Examination
105	00/00/2008	OFHEO	File			Excerpt from OFHEO examination notes providing agency analysis and pre-decisional deliberations in relation to examination of Fannie Mae's economic capital modeling	Deliberative Process; Bank Examination
106	00/00/2008	OFHEO	File			Excerpt from OFHEO examination notes providing agency analysis and pre-decisional deliberations in relation to examination of Fannie Mae's economic capital modeling	Deliberative Process; Bank Examination
107	8/15/2008	Lockhart, James	Mudd, Daniel	Swad, Steve; Senhauser, Bill*; Dickerson, Chris; Kerr, John; Tagoe, Naa Awaa		Supervisory Letter from FHFA to Fannie Mae providing agency recommendations in relation to examination of Fannie Mae's capital reserves, earnings and exposure to credit and interest rate risks	Bank Examination
108	00/00/2008	FHFA	File			Excerpts from FHFA meeting notes providing analysis, recommendations, and pre-decisional deliberations in relation to examination of Fannie Mae related to validation of forecasting models	Deliberative Process; Bank Examination

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109	8/15/2008	Lockhart, James	Mudd, Daniel	Swad, Steve; Senhauser, Bill*; Dickerson, Chris; Kerr, John; Tagoe, Naa Awaa		Supervisory Letter from FHFA to Fannie Mae providing agency recommendations in relation to examination of Fannie Mae's capital reserves, earnings and exposure to credit and interest rate risks	Bank Examination
110	8/00/2008	FHFA	File			Draft Supervisory Letter from FHFA to Fannie Mae providing pre-decisional regulatory analysis and recommendations regarding Fannie Mae's composite risk rating	Deliberative Process; Bank Examination
111	00/00/2008	FHFA	File			Excerpts from FHFA examination notes providing agency analysis, recommendations, and pre-decisional deliberations regarding Fannie Mae risk forecasting related to Alt-A Mortgages	Deliberative Process; Bank Examination
112	00/00/2008	FHFA	File			Excerpt from FHFA examination notes providing agency analysis, recommendations, and pre-decisional deliberations of Fannie Mae risk management modeling	Deliberative Process; Bank Examination
113	00/00/2008	FHFA	File			Excerpt from OFHEO examination notes providing agency analysis, recommendations, and pre-decisional deliberations regarding Fannie Mae's Loss Forecast Modeling and credit risks	Deliberative Process; Bank Examination
114	7/22/2008	Merves, Yosi	File			Confidential internal pre-decisional Meeting Notes providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Fannie Mae's Loss Forecast Modeling for Single Family Credit Risk	Deliberative Process; Bank Examination
115	6/3/2008	OFHEO	File			Confidential internal pre-decisional meeting notes providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Fannie Mae's pricing of Guarantee Fees	Deliberative Process; Bank Examination
116	7/9/2008	Merves, Yosi	File			Confidential internal pre-decisional meeting notes providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Fannie Mae's Loss Forecast Modeling and pricing of Guarantee Fees	Deliberative Process; Bank Examination
117	8/13/2008	Merves, Yosi	File			Confidential internal pre-decisional Meeting Notes providing agency opinions, recommendations and deliberations regarding FHFA's examination of Fannie Mae's fee pricing model for single family mortgages	Deliberative Process; Bank Examination
118	7/22/2008	Merves, Yosi	File			Confidential internal pre-decisional meeting notes providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Fannie Mae's Loss Forecast Modeling	Deliberative Process; Bank Examination
119	7/29/2008	Merves, Yosi	File			Confidential internal pre-decisional Meeting Notes providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Model Control Validation within Fannie Mae's Chief Risk Office	Deliberative Process; Bank Examination
120	8/6/2008	Merves, Yosi	File			Confidential internal pre-decisional meeting notes providing agency opinions, recommendations and deliberations regarding FHFA's examination of Model Control Validation Fannie Mae's Credit Model Validation and Loss Forecast modeling	Deliberative Process; Bank Examination
121	2/4/2008	Wisiz, Gerald	File			Confidential internal pre-decisional meeting notes providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Fannie Mae's credit risk analytics for mortgage applicants	Deliberative Process; Bank Examination

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122	6/30/2008	Eldarrat, Abdalla; Kvarnunas, Deirdre; Mehta, Vikas; Friedman, Timothy; Conger, Nicholas; Zhang, Min; Walker, Jeffrey; Akuete, Nii Ama; Stofferson, Robert; Astrada, Albert; Millman, Phillip; Heller, Timothy; Woody, Adam (Brock); Newell, Jamie	File			Confidential internal pre-decisional risk assessment memorandum providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Fannie Mae's composite Market Risk	Deliberative Process; Bank Examination
123	00/00/2008	OFHEO	File			Confidential internal pre-decisional document providing agency advisory opinions, recommendations and deliberations regarding OFHEO's examination of Fannie Mae's composite Market Risk for 4Q 2007	Deliberative Process; Bank Examination
124	00/00/2009	OFHEO	File			Confidential internal pre-decisional draft summary report providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Fannie Mae's Interest Rate Risk for 1Q 2008	Deliberative Process; Bank Examination
125	00/00/2010	OFHEO	File			Confidential internal pre-decisional document containing OFHEO's regulatory recommendations regarding Quarterly Performance Retained Portfolio Management for 1Q 2008	Deliberative Process; Bank Examination
126	6/30/2008	Eldarrat, Abdalla; Kvarnunas, Deirdre; Mehta, Vikas; Friedman, Timothy; Conger, Nicholas; Zhang, Min; Walker, Jeffrey; Akuete, Nii Ama; Stofferson, Robert; Astrada, Albert; Millman, Phillip; Heller, Timothy; Woody, Adam (Brock); Newell, Jamie	File			Confidential internal pre-decisional document containing Preliminary Risk Assessment Memorandum prepared by OFHEO providing agency analysis and recommendations regarding supervisory examination of Fannie Mae's overall Market Risk	Deliberative Process; Bank Examination
127	7/8/2008	Heller, Timothy	File			Confidential internal pre-decisional meeting notes providing agency opinions, recommendations and deliberations regarding OFHEO's examination of GSEs purchase of Mortgage Backed Securities	Deliberative Process; Bank Examination
128	6/30/2008	Eldarrat, Abdalla; Kvarnunas, Deirdre; Mehta, Vikas; Friedman, Timothy; Conger, Nicholas; Zhang, Min; Walker, Jeffrey; Akuete, Nii Ama; Stofferson, Robert; Astrada, Albert; Millman, Phillip; Heller, Timothy; Woody, Adam (Brock); Newell, Jamie	File			Preliminary Risk Assessment Memorandum prepared by OFHEO and providing agency analysis, recommendations, and pre-decisional deliberations regarding supervisory examination of Fannie Mae's overall Market Risk	Deliberative Process; Bank Examination
129	4/8/2008	Stofferson, Robert	File			Confidential internal pre-decisional document containing OFHEO's regulatory recommendations regarding Quarterly Performance Report regarding liquidity of Fannie Mae	Deliberative Process; Bank Examination

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130	7/8/2008	Stofferson, Robert	File			Confidential internal pre-decisional meeting notes providing agency opinions, recommendations and deliberations regarding OFHEO's examination of GSEs ability to raise additional capital	Deliberative Process; Bank Examination
131	8/5/2008	Kvartunas, Deirdre; Stofferson, Robert; Zhang, Min	File			Confidential internal pre-decisional draft meeting notes providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Fannie Mae's Interest Rate Risk	Deliberative Process; Bank Examination
132	8/21/2008	Eldarrat, Abdalla; Conger, Nicholas; Freidman	File			Confidential internal pre-decisional draft meeting notes providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Fannie Mae's Interest Rate Risk	Deliberative Process; Bank Examination
133	8/26/2008	Stofferson, Robert; Astrada, Albert; Mehta, Vikas	File			Confidential internal pre-decisional draft meeting notes providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Freddie Mac's Interest Rate Risk	Deliberative Process; Bank Examination
134	7/28/2008	Dickerson, Chris	Levin, Robert	Senhauser, Bill*; Niculescu, Peter; Benson, David		Supervisory Letter from OFHEO to Fannie Mae requesting information in conjunction with OFHEO's regulatory oversight regarding Fannie Mae's liquidity position and management plan	Bank Examination
135	8/4/2008	Benson, David	Dickerson, Chris	Levin, Robert; Senhauser, Bill*; Niculescu; Dallavecchia, Enrico; Newell, Jamie		Confidential letter from Fannie Mae to OFHEO providing information in response to OFHEO Supervisory Letter regarding Fannie Mae's liquidity position and management plan	Bank Examination
136	6/30/2008	Eldarrat, Abdalla; Kvartunas, Deirdre; Mehta, Vikas; Friedman, Timothy; Conger, Nicholas; Zhang, Min; Walker, Jeffrey; Akuete, Nii Ama; Stofferson, Robert; Astrada, Albert; Millman, Phillip; Heller, Timothy; Woody, Adam (Brock); Newell, Jamie	File			Preliminary Risk Assessment Memorandum prepared by OFHEO providing agency analysis, recommendations, and pre-decisional deliberations regarding supervisory examination of Fannie Mae's overall Market Risk	Deliberative Process; Bank Examination
137	6/30/2008	Dennis, Alicia; Calhoun, Peter; Tagoe, Naa Awaa	File			Confidential internal pre-decisional document containing Internal Preliminary Risk Assessment Memorandum prepared by OFHEO providing agency analysis and recommendations regarding supervisory examination of Fannie Mae's earning is the first half of 2008	Deliberative Process; Bank Examination
138	6/30/2008	Smith, Scott	File			Internal Preliminary Risk Assessment Memorandum prepared by OFHEO providing agency analysis, recommendations, and pre-decisional deliberations regarding supervisory examination of Fannie Mae's overall Market Risk	Deliberative Process; Bank Examination
139	4/7/2008	Lockhart, James	Mudd, Daniel	Swad, Steve; Senhauser, Bill*; Dickerson, Chris; Kerr, John; Tagoe, Naa Awaa		Supervisory Letter from OFHEO to Fannie Mae providing agency analysis and recommendations regarding OFHEO's examination of Fannie Mae's quarterly net income requirements	Bank Examination
140	8/22/2008	Dickerson, Chris	Mudd, Daniel	Swad, Steve; Senhauser, Bill*		Supervisory Letter from FHFA to Fannie Mae providing agency analysis and recommendations regarding Fannie Mae's compliance with capital classification requirements	Bank Examination
141	8/24/2008	Sudwa, Akwasi				Confidential presentation containing information prepared by FHFA in connection with Regulatory oversight regarding earnings and capital scenarios for Fannie Mae and Freddie Mac	Bank Examination
142	8/25/2008	Fannie Mae		Dickerson, Chris; DeMarco, Edward; DeLeo, Wanda; Smith, Scott		Confidential presentation prepared by Fannie Mae at the request of FHFA in connection with Regulatory oversight regarding capital earnings and stress scenarios for Fannie Mae	Bank Examination

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143	8/31/2008	Fernandez, Maria	File			Confidential presentation information prepared by FHFA in connection with Regulatory oversight and reflecting pre-decisional deliberations regarding earnings and capital scenarios for Fannie Mae and Freddie Mac	Deliberative Process; Bank Examination
144	9/5/2008	Dickerson, Chris	Lockhart, James			Confidential internal pre-decisional document containing agency advisory opinions, recommendations and deliberations prepared for the purpose of regulatory oversight regarding capital evaluation of the GSEs	Deliberative Process; Bank Examination
145	9/5/2008	Dickerson, Chris	Lockhart, James			Confidential internal pre-decisional draft document containing agency advisory opinions, recommendations and deliberations prepared in light of regulatory oversight regarding capital evaluation of the GSEs	Deliberative Process; Bank Examination
146	5/30/2008	Spohn, Jeffrey	Roberts, Toi; Dickerson, Chris;	Beckles, Erin; Eldarrat, Abdalla; Eldarrat, Christine; Lintecum, Lisa; Phillips, Steve; Roberts, Kyle*		Confidential email containing agency advisory opinions, recommendations, and pre-decisional deliberations prepared for the purpose of regulatory oversight regarding financial and market conditions of Freddie Mac	Deliberative Process; Bank Examination
147	8/21/2008	Sudwa, Akwasi	File			Confidential report providing information necessary for FHFA to conduct regulatory oversight of GSE regarding financial forecast analysis for Freddie Mac	Bank Examination
148	8/8/2008	McNicholas, John	Zaenger, Eileen; Smith, Scott			Confidential internal meeting notes containing agency advisory opinions, recommendations, and pre-decisional deliberations for the purpose of regulatory oversight regarding Freddie Mac capital requirements	Deliberative Process; Bank Examination
149	7/28/2008	Nelson, Adam	Zaenger, Eileen; Johnson, Mary			Confidential internal meeting notes containing agency advisory opinions, recommendations, and pre-decisional deliberations for the purpose of regulatory oversight regarding Freddie Mac capital requirements	Deliberative Process; Bank Examination
150	6/30/2008	McNicholas, John	Nelson, Adam; Zaenger, Eileen; Drake			Confidential memorandum providing agency opinions, recommendations, and pre-decisional deliberations prepared for the purpose of regulatory oversight regarding OFHEO meeting with Freddie Mac concerning minimum capital compliance requirements	Deliberative Process; Bank Examination
151	6/16/2008	Nelson, Adam	Zaenger, Eileen; Johnson, Mary			Confidential memorandum providing OFHEO opinions, recommendations, and pre-decisional deliberations prepared for the purpose of regulatory oversight regarding OFHEO meeting with Freddie Mac concerning minimum capital compliance requirements	Deliberative Process; Bank Examination
152	6/2/2008	Zaenger, Eileen	McNicholas, John; Johnson, Mary			Confidential memorandum providing OFHEO opinions, recommendations, and pre-decisional deliberations prepared for the purpose of regulatory oversight regarding OFHEO meeting with Freddie Mac concerning minimum capital compliance requirements	Deliberative Process; Bank Examination
153	5/15/2008	Nelson, Adam	Zaenger, Eileen; Johnson, Mary			Confidential memorandum providing OFHEO opinions, recommendations, and pre-decisional deliberations prepared for the purpose of regulatory oversight regarding OFHEO meeting with Freddie Mac concerning minimum capital compliance requirements	Deliberative Process; Bank Examination
154	4/21/2008	McNicholas, John	Zaenger, Eileen; Johnson, Mary			Confidential memorandum providing OFHEO opinions, recommendations, and pre-decisional deliberations prepared for the purpose of regulatory oversight regarding OFHEO meeting with Freddie Mac concerning minimum capital compliance requirements	Deliberative Process; Bank Examination
155	4/7/2008	Nelson, Adam	Zaenger, Eileen; Johnson, Mary			Confidential memorandum providing OFHEO opinions, recommendations, and pre-decisional deliberations prepared for the purpose of regulatory oversight regarding OFHEO meeting with Freddie Mac concerning minimum capital compliance requirements	Deliberative Process; Bank Examination
156	5/13/2008	Lockhart, James	Syron, Richard	Smith, Scott; Bostrom, Robert*; Pizsel, Buddy; Weiss, Jerry		Communication between OFHEO and Freddie Mac providing OFHEO's regulatory recommendations regarding Freddie Mac's planned capital issuance and treatment of asset-driven preferred stock	Bank Examination

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157	6/30/2008	Lockhart, James	Syron, Richard	Weiss, Jerry; Kerr, John; Spohn, Jeffrey		Confidential communication between OFHEO and Freddie Mac providing OFHEO's regulatory recommendations regarding Freddie Mac's quarterly capital plan and reserve requirements	Bank Examination
158	4/7/2008	Tagoe, Naa Awaa	Swad, Stephen	Doyle, Mary; Hisey, David; Dickerson, Chris; Smith, Scott; DeLeo, Wanda; Kerr, John		Confidential communication between OFHEO and Freddie Mac providing OFHEO advisory opinions, recommendations, and deliberations regarding examination of Freddie Mac's accounting and earnings	Bank Examination
159	4/7/2008	Tagoe, Naa Awaa	Piszel, Anthony	Amato, Joseph; Golding, Edward; Dickerson, Chris; Smith, Scott; DeLeo, Wanda; Spohn, Jeffrey		Confidential communication between OFHEO and Freddie Mac providing OFHEO's regulatory recommendations regarding the examination of Freddie Mac's earnings and the sustainability of earnings going forward	Bank Examination
160	5/5/2008	Kurtz-Wisdom, Paige	Tagoe, Naa Awaa	DeLeo, Wanda; Spohn, Jeffrey; Smith, Scott; Piszel, Anthony; Kellermann, David; Amato, Joseph; Wambeke, Carol; Weiss, Jerry		Confidential communication between OFHEO and Freddie Mac providing OFHEO's regulatory recommendations regarding the examination of Freddie Mac's GAAP earnings and sustainability of earnings going forward	Bank Examination
161	8/21/2008	Sudwa, Akwasi	File			Document prepared by FHFA relating to its regulatory supervision of the GSEs regarding earnings and capital forecast and stress test scenarios for Freddie Mac	Bank Examination
162	8/27/2008	FHFA	File			Confidential analysis providing agency advisory opinions, recommendations and deliberations regarding section of Freddie Mac Report of Examination related to Enterprise risk management	Bank Examination
163	4/10/2008	OFHEO	File			Confidential memorandum providing agency advisory opinions, recommendations and pre-decisional deliberations regarding OFHEO's notes from examination meeting with Freddie Mac related to current Asset Liability Management and Freddie Mac's duration risk profile	Deliberative Process; Bank Examination
164	7/00/08	Spohn, Jeffrey	File			Confidential draft Conclusion Letter from OFHEO to Freddie Mac reflecting OFHEO pre-decisional deliberations for the purpose of regulatory supervision regarding examination of Freddie Mac's risk exposure to CMBS portfolio	Deliberative Process; Bank Examination
165	8/7/2008	Astrada, Albert	File			Confidential internal pre-decisional draft meeting notes providing OFHEO opinions, recommendations and deliberations for the purpose of supervisory authority regarding OFHEO's examination of Freddie Mac's long term liquidity and debt funding	Deliberative Process; Bank Examination
166	6/00/08	OFHEO	File			Confidential document reflecting OFHEO pre-decisional deliberations for the purpose of regulatory supervision regarding examination of Freddie Mac's retained portfolio	Deliberative Process; Bank Examination
167	5/00/08	OFHEO	File			Confidential document reflecting OFHEO pre-decisional deliberations for the purpose of regulatory supervision regarding examination of Freddie Mac's retained portfolio	Deliberative Process; Bank Examination
168	4/00/08	OFHEO	File			Confidential document reflecting OFHEO pre-decisional deliberations for the purpose of regulatory supervision regarding examination of Freddie Mac's retained portfolio	Deliberative Process; Bank Examination
169	7/31/2008	Jones, Lara	Singh, Manoj; Escola, Douglas; Kuzbel, Jeffrey			Confidential document prepared by Freddie Mac and containing information necessary for FHFA to conduct regulatory oversight of GSE regarding Freddie Mac's stress scenarios and liquidity	Bank Examination
170	6/30/2008	Jones, Lara	Singh, Manoj; Escola, Douglas; Kuzbel, Jeffrey			Confidential document prepared by Freddie Mac and containing information necessary for FHFA to conduct regulatory oversight of GSE regarding Freddie Mac's market risk assessment	Bank Examination

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171	5/30/2008	Jones, Lara	Singh, Manoj; Escola, Douglas; Kuzbel, Jeffrey			Confidential document prepared by Freddie Mac and containing information necessary for FHFA to conduct regulatory oversight of GSE regarding Freddie Mac's market risk assessment	Bank Examination
172	8/26/2008	Roberts, Kyle*	File			Confidential internal pre-decisional draft document containing Kyle Robert*'s legal advice and FHFA advisory opinions, recommendations and pre-decisional deliberations prepared in light of regulatory oversight re: mid-year supervisory review of Freddie Mac	Attorney Client; Deliberative Process; Bank Examination
173	8/26/2008	Roberts, Kyle*	File			Confidential internal pre-decisional draft document containing Kyle Robert*'s legal advice and FHFA advisory opinions, recommendations and pre-decisional deliberations prepared in light of regulatory oversight re: mid-year supervisory review of Freddie Mac	Attorney Client; Deliberative Process; Bank Examination
174	8/26/2008	Roberts, Kyle*	File			Confidential internal pre-decisional draft document containing Kyle Robert*'s legal advice and FHFA advisory opinions, recommendations and pre-decisional deliberations prepared in light of regulatory oversight re: mid-year supervisory review of Freddie Mac	Attorney Client; Deliberative Process; Bank Examination
175	8/26/2008	Roberts, Kyle*	File			Confidential internal pre-decisional draft document containing Kyle Robert*'s legal advice and FHFA advisory opinions, recommendations and pre-decisional deliberations prepared in light of regulatory oversight re: mid-year supervisory review of Freddie Mac	Attorney Client; Deliberative Process; Bank Examination
176	8/26/2008	Roberts, Kyle*	File			Confidential internal pre-decisional draft document containing Kyle Robert*'s legal advice and FHFA advisory opinions, recommendations and pre-decisional deliberations prepared in light of regulatory oversight re: examination of Freddie Mac's modeling processes and accounting methods	Attorney Client; Deliberative Process; Bank Examination
177	4/18/2008	DeLeo, Wanda	Pizsel, Anthony	Weiss, Jerry; Saksena, Anurag; Spohn, Jeffrey		Confidential communication between OFHEO and Freddie Mac providing regulatory conclusions regarding OFHEO's examination of Freddie Mac's OTTI analysis and decisions for Q2 2007	Bank Examination
178	4/7/2008	DeLeo, Wanda	Pizsel, Anthony	Roberts, Toi; Reid, Len; Pollard, Alfred*; DeMarco, Edward; Lockhart, James		Confidential communication between OFHEO and Freddie Mac providing regulatory conclusions regarding OFHEO's examination of Freddie Mac's GAAP earnings and sustainability of future earnings	Bank Examination
179	8/22/2008	Dickerson, Chris	Syron, Richard	Weiss, Jerry		Confidential communication between FHFA and Freddie Mac providing FHFA's regulatory recommendations regarding FHFA's examination of Freddie Mac's capitalization utilizing the risk-based capital stress test	Bank Examination
180	8/31/2008	Fernandez, Maria	File			Document prepared by FHFA relating to its regulatory supervision of the GSEs regarding enterprise loss projections	Bank Examination
181	9/5/2008	Dickerson, Chris	Lockhart, James			Confidential internal pre-decisional document providing agency advisory opinions, recommendations and deliberations regarding FHFA's examination of the capital evaluation of Fannie Mae and Freddie Mac	Deliberative Process; Bank Examination
182	8/21/2008	Kelly, Austin	File			Confidential internal pre-decisional meeting notes providing FHFA opinions, recommendations, and deliberations regarding OFHEO's examination of Freddie Mac's modeling of Private Label Securities	Deliberative Process; Bank Examination
183	8/00/2008	Dickerson, Chris	File			Excerpt from confidential internal pre-decisional draft document containing FHFA advisory opinions, recommendations and deliberations prepared in light of regulatory oversight re: mid-year supervisory review of Freddie Mac	Deliberative Process; Bank Examination
184	9/3/2008	Satriano, Nicholas	File			Confidential Document providing FHFA's regulatory recommendations and pre-decisional deliberations regarding allowance for loan and lease losses exam findings	Deliberative Process; Bank Examination
185	9/4/2008	Dickerson, Christopher	Mudd, Daniel	Senhauser, William*		Confidential communication and draft Mid Year Supervisory Letter from FHFA to Fannie Mae containing agency regulatory recommendations prepared in light of regulatory oversight regarding Fannie Mae's composite risk ratings	Bank Examination

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Log Line ID	Date	From / Author	To / Recipient	CC	Additional Recipients	Description	Privilege Assertion
186	8/00/2008	Fannie Mae	File			Presentation containing information prepared by Fannie Mae at the request of FHFA in connection with regulatory oversight regarding Fannie Mae corporate financial outlook and stress forecasts	Bank Examination
187	8/11/2008	Lewis, Steve	File			Confidential presentation prepared by FHFA in connection with regulatory oversight of the GSEs containing information regarding accounting for income taxes and deferred tax assets	Bank Examination
188	4/7/2008	Tagoe, Naa Awaa	Swad, Stephen	Doyle, Mary; Hisey, David; Dickerson, Christopher; Smith, Scott; DeLeo, Wanda; Kerr, John		Confidential communication from OFHEO to Freddie Mac prepared in connection with regulatory oversight regarding earnings examination of Freddie Mac	Bank Examination
189	7/30/2008	Dickerson, Christopher	File			Confidential document providing information prepared at the request of FHFA in connection with regulatory oversight of Fannie Mae regarding GAAP earnings and minimum capital forecasts	Bank Examination
190	00/00/2008	OFHEO	File			Excerpt from OFHEO meeting notes prepared in relation to regulatory oversight of Fannie Mae providing agency analysis and pre-decisional deliberations regarding examination of earnings and capital levels	Deliberative Process; Bank Examination
191	00/00/2008	OFHEO	File			Report of Examination of Fannie Mae by OFHEO providing supervisory analysis and recommendations regarding Fannie Mae's financial safety and soundness	Bank Examination
192	8/00/2008	FHFA	Fannie Mae			Draft Supervisory Letter from FHFA to Fannie Mae providing pre-decisional regulatory analysis and recommendations regarding Fannie Mae's composite risk rating	Bank Examination
193	8/00/2008	FHFA	Fannie Mae			Excerpt from FHFA examination notes providing agency analysis regarding Fannie Mae's market risk modeling and attaching draft Supervisory Letter to Fannie Mae regarding Fannie Mae's composite risk ratings and reflecting FHFA pre-decisional deliberations	Deliberative Process; Bank Examination
194	5/2/2008	Wis, Gerald	File			Confidential internal pre-decisional draft analysis memorandum providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Fannie Mae's credit risk for the Expanded Approval program using the Desktop Underwriter models	Deliberative Process; Bank Examination
195	4/9/2008	Kerr, John	File			Confidential internal pre-decisional OFHEO Risk Assessment Narrative providing agency analysis and recommendations regarding examination of Fannie Mae's credit risk	Deliberative Process; Bank Examination
196	8/15/2008	Kerr, John	File			Confidential internal pre-decisional OFHEO Composite Risk Assessment Memorandum providing agency analysis and recommendations regarding examination of Fannie Mae's composite risk ratings	Deliberative Process; Bank Examination
197	6/9/2008	Lockhart, James	Mudd, Daniel	Senhauser, Bill*; Ashley, Stephen		Confidential Supervisory Letter from OFHEO to Fannie Mae in connection with regulatory oversight regarding capital classification requirements for Fannie Mae	Bank Examination
198	4/7/2008	Tagoe, Naa Awaa	Swad, Stephen	Doyle, Mary; Hisey, David; Dickerson, Christopher; Smith, Scott; DeLeo, Wanda; Kerr, John		Confidential communications from OFHEO to Fannie Mae created in connection with regulatory oversight regarding examinations of Fannie Mae's earnings and risk management	Bank Examination
199	9/4/2008	Dickerson, Christopher	Mudd, Daniel	Senhauser, William*		Confidential communication and attached draft Mid Year Letter sent from FHFA to Fannie Mae providing agency analysis and recommendations regarding examination of Fannie Mae's composite ratings	Bank Examination
200	9/4/2008	Dickerson, Christopher	Syron, Richard	Weiss, Jerry		Confidential communication and draft Mid Year Letter shared with Freddie Mac in light of regulatory oversight regarding mid-year supervisory review of Freddie Mac	Bank Examination
201	8/24/2008	Dennis, Alicia; Suadwa, Akwasi	File			Confidential Document providing FHFA's analysis regarding the examination of both GSEs accounting and financial performance in 2008	Bank Examination

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Log Line ID	Date	From / Author	To / Recipient	CC	Additional Recipients	Description	Privilege Assertion
202	5/21/2008	Eldarrat, Christine; Holt, Philip	Weiss, Jerry; Kain, Gary; May, Mike; Romano, Ray	Aboff, Bruce; Dickerson, Christopher; Spohn, Jeffrey; Roberts, Kyle*		Confidential communication between OFHEO and Freddie Mac providing agency advisory opinions, recommendation, and deliberations regarding OFHEO's examination of regulatory, legal and reputational risk to Freddie Mac related to Tax Exempt Bond Securitization Transaction	Bank Examination
203	7/22/2008	Kucik, Hyacinth	Eldarrat, Christine; Holt, Philip	Bostrom, Robert*; Weiss, Jerry; May, Michael; Kain, Gary; Romano, Raymond; Aboff, Bruce		Confidential communication between OFHEO and Freddie Mac providing information requested by OFHEO in connection with their regulatory oversight regarding OFHEO's examination of regulatory, legal and reputational risk to Freddie Mac related to Tax Exempt Bond Securitization Transaction	Bank Examination
204	8/15/2008	Spohn, Jeffrey	File			Confidential internal pre-decisional OFHEO Risk Assessment Memorandum providing agency opinions, recommendations and deliberations regarding FHFA's examination of Freddie Mac's composite risk rating	Deliberative Process; Bank Examination
205	6/30/2008	Roberts, Kyle*	File			Confidential internal pre-decisional OFHEO Risk Assessment Memorandum providing agency opinions, recommendations and deliberations regarding examination of Freddie Mac's modeling processes and accounting methods	Deliberative Process; Bank Examination
206	6/30/2008	Dennis, Alicia; Calhoun, Peter; Tagoe, Naa Awaa	File			Confidential internal pre-decisional OFHEO Risk Assessment Memorandum providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Freddie Mac's earnings and credit related expenses	Deliberative Process; Bank Examination
207	6/30/2008	Kvartunas, Deirdre; Eldarrat, Christine; Mehta, Vikas; Friedman, Timothy; Conger, Nicholas; Walker, Jeffrey; Akuete, Nii Ama; Stofferson, Robert; Millman, Phillip; Astrada, Albert; Heller, Timothy; Zhang, Min; Woody, Adam; Newell, Jamie	File			Confidential internal pre-decisional OFHEO Risk Assessment Memorandum providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Freddie Mac's funding and liquidity risks	Deliberative Process; Bank Examination
208	9/4/2008	Dickerson, Christopher	Syron, Richard	Weiss, Jerry		Confidential communication and attached draft Mid Year Letter sent from FHFA to Freddie Mac providing agency analysis and recommendations regarding examination of Freddie Mac's capital level, forecasted losses and composite risk ratings	Bank Examination
209	8/6/2008	Damron, Julie	Tagoe, Naa Awaa	Wagner, Jacqueline		Confidential communication from Freddie Mac to OFHEO prepared in connection with regulatory oversight regarding earnings examination of Freddie Mac	Bank Examination
210	4/7/2008	Tagoe, Naa Awaa	Piszel, Anthony	Amato, Joseph; Golding, Edward; Dickerson, Chris; Smith, Scott; DeLeo, Wanda; Spohn, Jeffrey		Confidential communication from OFHEO to Freddie Mac prepared in connection with regulatory oversight regarding earnings examination of Freddie Mac	Bank Examination
211	5/5/2008	Kurtz-Wisdom, Paige	Tagoe, Naa Awaa	DeLeo, Wanda; Spohn, Jeffrey; Smith, Scott; Piszel, Anthony; Kellermann, David; Amato, Joseph; Wambeke, Carol; Weiss, Jerry		Confidential communication from Freddie Mac to OFHEO prepared in connection with regulatory oversight regarding earnings examination of Freddie Mac	Bank Examination
212	6/11/2008	Freddie Mac	OFHEO			Confidential presentation prepared by Freddie Mac and provided to OFHEO in connection with regulatory oversight regarding the Freddie Mac corporate forecast process	Bank Examination
213	4/4/2008	DeLeo, Wanda	Beresford, Dennis	Lockhart, James; Senhauser, William*; Dallavecchia, Enrico		Confidential communications from OFHEO to Fannie Mae created in connection with regulatory oversight regarding examinations of Fannie Mae's earnings and risk management	Bank Examination

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214	4/3/2008	Kerr, John	Shaw, Michael	Kvartunas, Deidre; Senhauser, William*; Dallavecchia, Enrico; Wagner, Jacquie		Confidential communications from OFHEO to Fannie Mae created in connection with regulatory oversight regarding examinations of Fannie Mae's earnings and risk management	Bank Examination
215	5/23/2008	Dickerson, Christopher	Mudd, Daniel	Swad, Stephen, Senhauser, Bill*; Kerr, John		Confidential Supervisory Letter from OFHEO to Fannie Mae in connection with regulatory oversight regarding capital classification requirements for Fannie Mae	Bank Examination
216	6/5/2008	Swad, Stephen	Dickerson, Chris	Lockhart, James; DeMarco, Edward; Smith, Scott; Kerr, John; Johnson, Mary; Mudd, Daniel; Levin, Robert; Wilkinson; Niculescu, Peter; Senhauser, William*		Confidential communication from Fannie Mae to OFHEO in connection with regulatory oversight regarding capital classification requirements for Fannie Mae	Bank Examination
217	5/9/2008	Mudd, Daniel	Lockhart, James	Swad, Steve; Senhauser, Bill*; Dickerson, Chris; Kerr, John; Tagoe, Naa Awa; Smith, Scott; Levin, Robert; Niculescu, Peter		Confidential communication from Fannie Mae to OFHEO in connection with regulatory oversight regarding OFHEO's examination of Fannie Mae's capital requirements	Bank Examination
218	8/4/2008	Benson, David	Dickerson, Christopher	Senhauser, Bill*; Niculescu, Peter; Benson, David; Levin, Rob	Dallavecchia, Enrico; Newell, Jamie	Response letter from David Benson (Fannie Mae) to Chris Dickerson (FHFA) providing information necessary for FHFA to provide analysis and recommendations regarding the examination of Fannie Mae's liquidity management	Bank Examination

Exhibit B

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Log Line ID	Date	From / Author	To / Recipient	CC	Additional Recipients	Description	Privilege Assertion
219	12/30/2008	Lockhart, James	Brereton, Peter; DeMarco, Edward; Pafenberg, Forrest; Pollard, Alfred*	Lawler, Patrick	Pfeil, Maureen; Greener, Chuck	Email communication between FHFA and Fannie Mae seeking regulatory approval and reflecting Alfred Pollard*'s legal advice regarding Fannie Mae's draft financial disclosures	Attorney Client; Bank Examination
220	12/30/2008	Lockhart, James	Pollard, Alfred*; Dickerson, Christopher; DeMarco, Edward; Felt, David*; Smith, Scott			Email communication among senior FHFA staff containing pre-decisional deliberations and requesting and providing Alfred Pollard*'s legal advice regarding a draft communication to Fannie Mae pertaining to the mandatory receivership provision of the SPSPAs	Attorney Client; Deliberative Process
221	8/6/2008	Lockhart, James	File			Draft public statement reflecting FHFA pre-decisional deliberations regarding GSE minimum capital and risk-based capital requirements	Deliberative Process
222	6/23/2011	Lutton, Thomas	Dickerson, Christopher	Cauthen, Joseph; Bowes, Lori; Gerald G. Wisz; Nelson, Adam; Murphy, Stephen; Hogan, Art		RM: Internal FHFA pre-decisional email deliberating on news report discussing impact of non-performing mortgages on FHFA efforts to wind down GSEs	Deliberative Process
223	9/21/2012	Stauffer, Lawrence	Dickerson, Christopher			Draft white paper prepared by FHFA and containing pre-decisional deliberations regarding proposed framework for the GSE securitization platform	Deliberative Process
224	12/11/2008	Dickerson, Christopher	Lockhart, James	Tagoe, Naa Awaa; Pollard, Alfred*		Draft report prepared by FHFA provided for legal review by Alfred Pollard* and containing FHFA pre-decisional deliberations in its regulatory capacity regarding financial analysis of the GSEs for the third quarter of 2008	Attorney Client; Deliberative Process; Bank Examination
225	11/7/2008	Dickerson, Christopher	Eldarrat, Abdalla	Zhang, Min; Friedman, Timothy; Kwartunas, Deirdre; Newell, Jamie		Internal FHFA email containing pre-decisional discussions and analysis regarding Freddie Mac request for approval for change in capital requirements received in connection with FHFA's regulatory oversight authority	Deliberative Process; Bank Examination
226	8/24/2008	Dickerson, Christopher	Juhas, Peter		DeLeo, Wanda	Email communication between FHFA and consultant for Treasury regarding pre-decisional deliberations on the financial condition of Freddie Mac	Deliberative Process
227	5/6/2008	Dickerson, Christopher	File			Draft supervisory letter containing OFHEO pre-decisional deliberations and requesting information necessary for OFHEO to conduct regulatory oversight of Fannie Mae regarding market risk limits	Deliberative Process; Bank Examination
228	5/6/2008	Dickerson, Christopher	File			Draft supervisory letter containing OFHEO pre-decisional deliberations and requesting information necessary for OFHEO to conduct regulatory oversight of Freddie Mac regarding market risk limits	Deliberative Process; Bank Examination
229	8/15/2008	Tagoe, Naa Awaa	Dickerson, Christopher			Draft supervisory letter containing FHFA pre-decisional deliberations and requesting information necessary for FHFA to conduct regulatory oversight of Fannie Mae regarding Fannie Mae's earnings and capital exposure and credit and interest rate risks	Deliberative Process; Bank Examination
230	4/8/2008	Lawler, Patrick	Dickerson, Christopher			Draft letter to Congress containing OFHEO pre-decisional deliberations regarding OFHEO's annual report to Congress and examination concerning the financial condition of the GSEs	Deliberative Process

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Log Line ID	Date	From / Author	To / Recipient	CC	Additional Recipients	Description	Privilege Assertion
231	8/6/2008	Lockhart, James	Dickerson, Christopher			Draft press statement reflecting FHFA pre-decisional deliberations regarding GSE minimum capital and risk-based capital requirements	Deliberative Process
232	12/22/2008	Brereton, Peter	Dickerson, Christopher			Draft press release containing FHFA pre-decisional deliberations regarding the financial condition and capital levels of the GSEs prior to the Conservatorship	Deliberative Process
233	12/22/2008	Brereton, Peter	Dickerson, Christopher			Draft press release containing FHFA pre-decisional deliberations regarding the financial condition and capital levels of the GSEs prior to the Conservatorship	Deliberative Process
234	4/25/2008	Dickerson, Christopher	Pearl, David		Satriano, Nicholas; Roberts, Toi; DeLeo, Wanda	Internal report containing agency advisory opinions, recommendations, and pre-decisional deliberations regarding GSE accounting issues	Deliberative Process
235	5/14/2008	Dickerson, Christopher	Hanley, Joanne	Lockhart, James; Brereton, Peter; DeMarco, Edward; Pollard, Alfred*; Lawler, Patrick		Draft letter containing FHFA pre-decisional deliberations regarding response to Congressional inquiry concerning Fannie Mae financial results	Deliberative Process
236	5/13/2008	Dickerson, Christopher	DeLeo, Wanda; Tagoe, Naa Awaa		Bostrom, Robert*; Pollard, Alfred*; Lockhart, James; Spohn, Jeffrey; Smith, Scott; Syron, Richard; Pizel, Anthony; Weiss, Jerry; Amato, Joseph; Oliver, Bruce*	Letter from Freddie Mac to OFHEO in its supervisory capacity regarding OFHEO approval for Freddie Mac's capital related transactions	Bank Examination
237	5/12/2008	Dickerson, Christopher	Deleon, Wanda; Tagoe, Naa Awaa; Smith, Scott		Bostrom, Robert*; Pollard, Alfred*; Brereton, Peter; Spohn, Jeffrey; Weiss, Jerry	Draft press release created by Freddie Mac and provided to OFHEO for regulatory review and approval regarding Freddie Mac's first quarter 2008 financial results.	Bank Examination
238	5/12/2008	Dickerson, Christopher	Deleon, Wanda; Tagoe, Naa Awaa; Smith, Scott		Bostrom, Robert*; Pollard, Alfred*; Brereton, Peter; Spohn, Jeffrey; Weiss, Jerry	Draft appendix to Freddie Mac's SEC form 10Q created by Freddie Mac and provided to OFHEO for regulatory review and approval regarding Freddie Mac's first quarter 2008 financial results.	Bank Examination
239	5/9/2008	Dickerson, Christopher	Pearl, David; Murphy, Stephen		DeLeo, Wanda	Internal OFHEO status report created in OFHEO's supervisory capacity regarding GSE accounting issues	Bank Examination
240	5/7/2008	Dickerson, Christopher	Kvartunas, Deirdre			Report prepared by Freddie Mac and provided at OFHEO's request in its regulatory capacity for review and analysis regarding the impact of Freddie Mac's liquidity management on its economic capital	Bank Examination
241	5/5/2008	Dickerson, Christopher	Mullin, Stefanie			Draft Fannie Mae press release provided to OFHEO in its supervisory capacity for review and approval regarding Fannie Mae's first quarter 2008 financial results	Bank Examination
242	4/29/2008	Dickerson, Christopher	Lockhart, James			Draft supervisory letter containing OFHEO pre-decisional deliberations and requesting information necessary to conduct its supervision of Freddie Mac regarding projected earnings relative to market risk position	Deliberative Process; Bank Examination
243	4/29/2008	Dickerson, Christopher	Lockhart, James			Draft supervisory letter containing OFHEO pre-decisional deliberations and requesting information necessary to conduct its supervision of Fannie Mae regarding projected earnings relative to market risk position	Deliberative Process; Bank Examination

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244	4/28/2008	Dickerson, Christopher	Kerr, John			Email reflecting information necessary for OFHEO to conduct oversight of GSEs operational risk measurements project	Bank Examination
245	6/13/2008	Dickerson, Christopher	OS Senior Mgmt			Supervisory memorandum containing OFHEO oversight activities of the GSEs regarding accounting issues at the GSEs and Fannie Mae's earnings forecasts for 2008 and 2009	Bank Examination
246	6/3/2008	Dickerson, Christopher	DeLeo, Wanda		Lockhart, James; Mudd, Daniel; Kerr, John; Tagoe, Naa Awaa; Smith, Scott; Levin, Robert; Niculescu, Peter; Senhauser, William*; Swad, Steve	Correspondence from Fannie Mae to OFHEO providing information requested by OFHEO in order for it to conduct regulatory oversight regarding the capital position and quarterly capital plan for Fannie Mae.	Bank Examination
247	9/4/2008	Dickerson, Christopher	Eldarrat, Christopher			Draft document reflecting Alfred Pollard*'s legal advice and containing FHFA pre-decisional deliberations in connection with its regulatory recommendations and oversight concerns regarding Freddie Mac's market risk management.	Attorney Client; Deliberative Process; Bank Examination
248	9/9/2008	Dickerson, Christopher	Roberts, Kyle*			Draft SEC Form 8-K prepared by Freddie Mac and provided to FHFA in its regulatory capacity for review and approval	Bank Examination
249	9/9/2008	Dickerson, Christopher	Mullin, Stefanie; Lockhart, James	DeMarco, Edward; Brereton, Peter; Pollard, Alfred*; Tagoe, Naa Awaa		Email communication among senior FHFA staff providing pre-decisional deliberations on the potential factors to be used in assessing when the GSEs are stabilized	Deliberative Process
250	8/13/2008	Dickerson, Christopher	Reid, Leonard	Tagoe, Naa Awaa		Document prepared by Fannie Mae at the request of FHFA in order for FHFA to conduct regulatory oversight of Fannie Mae regarding earnings, capital forecasts, and stress test scenarios	Bank Examination
251	9/5/2008	Dickerson, Christopher	Calhoun, Peter; Tagoe, Naa Awaa			Draft presentation containing FHFA pre-decisional deliberations in light of its regulatory oversight of GSEs regarding the financial condition of Freddie Mac and objectives of FHFA under the conservatorship	Deliberative Process; Bank Examination
252	9/5/2008	Dickerson, Christopher	Calhoun, Peter; Tagoe, Naa Awaa			Draft presentation containing FHFA pre-decisional deliberations in light of its regulatory oversight of GSEs regarding the financial condition of Fannie Mae and objectives of FHFA under the conservatorship	Deliberative Process; Bank Examination
253	9/4/2008	Dickerson, Christopher	Hamilton-Brown, Jascy			Draft supervisory letter containing Alfred Pollard*'s legal advice and FHFA pre-decisional deliberations in its regulatory capacity regarding Fannie Mae's composite rating and financial condition for the first half of 2008	Attorney Client; Deliberative Process; Bank Examination
254	9/3/2008	Dickerson, Christopher	Newell, Jamie	Kvartunas, Deirdre; Millman, Phillip; Heller, Timothy; Walker, Jeffrey; Lockhart, James; Calhoun, Peter	DeLeo, Wanda	Email among FHFA senior staff providing information in connection with FHFA's oversight of the GSEs regarding GSE capital and loss estimates	Bank Examination
255	9/3/2008	Dickerson, Christopher	Smith, Scott; Fernandez, Maria; Kelly, Austin; Roberts, Kyle*; Spohn, Jeffrey; Kerr, John		Newell, Jamie; Lockhart, James; DeLeo, Wanda; Calhoun, Peter; Kvartunas, Deirdre; Millman, Phillip; Heller, Timothy; Walker, Jeffrey	Email among FHFA senior staff providing information in connection with FHFA's oversight of the GSEs regarding GSE capital and loss estimates	Bank Examination

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256	9/3/2008	Dickerson, Christopher	Smith, Scott; Fernandez, Maria; Kelly, Austin; Roberts, Kyle*; Spohn, Jeffrey; Kerr, John			Presentation created by FHFA providing information in connection with FHFA's oversight of the GSEs regarding GSE capital and loss estimates	Bank Examination
257	8/31/2008	Dickerson, Christopher	Calhoun, Peter; Pearl, David		Smith, Scott; Fernandez, Maria; Newell, Jamie; Roberts, Kyle*; DeLeo, Wanda; Kerr, John; Spohn, Jeffrey; Kelly, Austin; Lockhart, James; DeMarco, Edward; Mierzewski, Michael*; Pollard, Alfred*; McCormally, Brian*; Alexander, Richard*; Hyde, Howard*	Draft supervisory letter containing FHFA outside counsel Arnold & Porter*'s legal advice and FHFA pre-decisional deliberations and memorializing FHFA's regulatory recommendations and oversight concerns regarding Fannie Mae's financial condition and composite rating	Attorney Client; Deliberative Process; Bank Examination
258	8/31/2008	Dickerson, Christopher	Calhoun, Peter; Pearl, David			Draft supervisory letter containing FHFA outside counsel Arnold & Porter*'s legal advice and FHFA pre-decisional deliberations and memorializing FHFA's regulatory recommendations and oversight concerns regarding Freddie Mac's financial condition and composite rating	Attorney Client; Deliberative Process; Bank Examination
259	8/22/2008	Dickerson, Christopher	Lockhart, James; Pollard, Alfred*			Draft supervisory letter containing FHFA pre-decisional deliberations in its regulatory capacity and provided for Alfred Pollard*'s legal advice regarding Fannie Mae's earnings and capital conditions	Attorney Client; Deliberative Process; Bank Examination
260	8/22/2008	Dickerson, Christopher	Lockhart, James; Pollard, Alfred*			Draft supervisory letter containing FHFA pre-decisional deliberations in its regulatory capacity and provided for Alfred Pollard*'s legal advice regarding Freddie Mac's earnings and capital conditions	Attorney Client; Deliberative Process; Bank Examination
261	8/30/2008	Dickerson, Christopher	Pearl, David			Internal presentation prepared by FHFA and containing pre-decisional deliberations in its supervisory capacity regarding Enterprise loss projections	Deliberative Process; Bank Examination
262	8/30/2008	Dickerson, Christopher	Pearl, David			Document prepared by FHFA and containing pre-decisional deliberations in its supervisory capacity regarding GSE loss and capital projections.	Deliberative Process; Bank Examination
263	8/30/2008	Dickerson, Christopher	Pearl, David			Document prepared by FHFA and containing pre-decisional deliberations in its supervisory capacity regarding GSE loss and capital projections.	Deliberative Process; Bank Examination
264	8/30/2008	Dickerson, Christopher	Pearl, David		Tagoe, Naa Awaa; Lockhart, James; DeMarco, Edward; Dickerson, Christopher; DeLeo, Wanda; Lawler, Patrick; Smith, Scott; Kelly, Austin; Pearl, David; Spohn, Jeffrey; Fernandez, Maria	Email communication among senior FHFA staff relating to FHFA's regulatory supervision of the GSEs regarding earnings and capital forecast and stress test scenarios for Freddie Mac	Deliberative Process
265	8/27/2008	Dickerson, Christopher	Connelly, Carol			Draft Supervisory Letter reflecting Alfred Pollard*'s legal advice and FHFA pre-decisional deliberations in it's regulatory capacity regarding the financial condition and governance issues of Fannie Mae	Attorney Client; Deliberative Process; Bank Examination

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266	8/27/2008	Dickerson, Christopher	Connelly, Carol			Draft Supervisory Letter reflecting Alfred Pollard*'s legal advice and FHFA pre-decisional deliberations in it's regulatory capacity regarding the financial condition and governance issues of Freddie Mac	Attorney Client; Deliberative Process; Bank Examination
267	8/26/2008	Dickerson, Christopher	Roberts, Toi			Draft supervisory letter containing FHFA pre-decisional deliberations in its regulatory capacity regarding Freddie Mac's credit governance, solvency rating, earnings forecast, and risk management	Deliberative Process; Bank Examination
268	8/26/2008	Dickerson, Christopher	Roberts, Toi			Draft supervisory letter containing FHFA pre-decisional deliberations in its regulatory capacity regarding Fannie Mae's credit governance, solvency rating, earnings forecast, and risk management	Deliberative Process; Bank Examination
269	8/22/2008	Dickerson, Christopher	McNicholas, John			Draft letter prepared by FHFA, in its regulatory capacity, reflecting pre-decisional deliberations and recommendations in connection with assessment of Fannie Mae's capital position	Deliberative Process; Bank Examination
270	8/24/2008	Dickerson, Christopher	DeLeo, Wanda		Juhas, Peter	Email communication between FHFA and consultant for Treasury containing pre-decisional deliberations on the financial condition of Freddie Mac	Deliberative Process; Bank Examination
271	8/24/2008	Dickerson, Christopher	Smith, Scott		Spohn, Jeffrey; Kerr, John; Newell, Jamie; Fernandez, Maria; Kelly, Austin; Roberts, Kyle*; DeLeo, Wanda; DeMarco, Edward; Pollard, Alfred*; Lockhart, James; Norton, Jeremiah; Albrecht, Stephen; Ryan, Tony; Singh, Shelley; Brown, Steven	Email communication between FHFA and Treasury staff providing documents prepared by consultant for Treasury containing pre-decisional deliberations on the financial conditions of the GSEs	Deliberative Process; Bank Examination
272	8/23/2008	Dickerson, Christopher	Smith, Scott			Document prepared by consultant for Treasury containing pre-decisional deliberations on the financial conditions of the GSEs and the effect of conservatorship or receivership	Deliberative Process; Bank Examination
273	8/23/2008	Dickerson, Christopher	Smith, Scott			Presentation prepared by consultant for Treasury containing pre-decisional deliberations on the financial conditions of the GSEs	Deliberative Process; Bank Examination
274	8/23/2008	Dickerson, Christopher	Smith, Scott			Presentation prepared by consultant for Treasury containing pre-decisional deliberations on the financial conditions of the GSEs	Deliberative Process; Bank Examination
275	8/23/2008	Dickerson, Christopher	Smith, Scott			Presentation prepared by consultant for Treasury containing pre-decisional deliberations on the financial conditions of the GSEs	Deliberative Process; Bank Examination
276	8/23/2008	Dickerson, Christopher	Smith, Scott			Presentation prepared by consultant for Treasury containing pre-decisional deliberations on the financial conditions of the GSEs	Deliberative Process; Bank Examination
277	8/24/2008	Dickerson, Christopher	Spohn, Jeffrey; Kerr, John; Newell, Jamie; Fernandez, Maria; Kelly, Austin; Roberts, Kyle*; DeLeo, Wanda		DeMarco, Edward; Pollard, Alfred; Lockhart, James; Norton, Jeremiah; Albrecht, Stephen; Ryan, Tony; Singh, Shelley; Brown, Steven	Email communication between FHFA and Treasury staff providing documents prepared by consultant for Treasury containing pre-decisional deliberations on the financial conditions of the GSEs	Deliberative Process; Bank Examination

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278	8/22/2008	Dickerson, Christopher	Kerr, John		Lockhart, James	Draft supervisory letter containing OFHEO pre-decisional deliberations in OFHEO's regulatory capacity regarding the credit risk analysis of Fannie Mae	Deliberative Process; Bank Examination
279	8/20/2008	Dickerson, Christopher	Roberts, Toi			Presentation containing pre-decisional deliberations and providing OFHEO providing regulatory results and recommendations regarding GSE earnings and capital stress case scenarios	Deliberative Process; Bank Examination
280	8/20/2008	Dickerson, Christopher	Roberts, Toi			Presentation prepared by Fannie Mae at the request of FHFA in order for FHFA to conduct regulatory oversight of Fannie Mae regarding earnings and capital forecast and stress test scenarios	Bank Examination
281	8/20/2008	Dickerson, Christopher	Roberts, Toi			Presentation containing pre-decisional deliberations and providing OFHEO regulatory results and recommendations regarding GSE earnings and capital stress case scenarios	Deliberative Process; Bank Examination
282	8/15/2008	Dickerson, Christopher	Roberts, Kyle*; Eldarrat, Christopher; Newell, Jamie; Kelly, Austin; Fernandez, Maria; Pearl, David		Spohn, Jeffrey; Roberts, Toi; DeLeo, Wanda; Ford, Ariane; Garner, Gregory; Johnson, Lola; Keen, Jeff; Kerr, John; McCluskey, Karen; Murphy, Sharon; O'Dea, Tom; Paulin, Anne; Pinkepank, Gail; Preist, Paul; Walker, Reginald; Wallas, Michael; Williams, Rebecca	Email communication among OHFEO staff providing pre-decisional deliberations and supervisory observations and status reports regarding the GSE operational risk	Deliberative Process; Bank Examination
283	8/14/2008	Dickerson, Christopher	Pollard, Alfred*; Roberts, Kyle*; Felt, David*			Draft document reflecting OFHEO's pre-decisional deliberations in its supervisory capacity and provided for counsel's legal advice regarding operational and management issues concerning Freddie Mac.	Attorney Client; Deliberative Process; Bank Examination
284	8/14/2008	Dickerson, Christopher	Lawler, Patrick; Newell, Jamie; Smith, Scott	Pollard, Alfred*		Email communication among senior OHFEO staff reflecting request for legal advice of counsel Alfred Pollard* on pre-decisional deliberations as to OFHEO's regulatory authority regarding GSE capital charge requirements	Attorney Client; Deliberative Process; Bank Examination
285	8/8/2008	Dickerson, Christopher	Newell, Jamie		Friedman, Timothy; Kvarnunas, Deidre; Lockhart, James; DeMarco, Edward; Lawler, Patrick	RM: Email communication reflecting OFHEO supervisory actions and activities regarding Fannie Mae option calls	Bank Examination
286	8/7/2008	Dickerson, Christopher	Kvarnunas, Deidre; Newell, Jamie			Email communication providing notes from supervisory meeting with Freddie Mac and reflecting OFHEO pre-decisional deliberations regarding GSE funding issues	Deliberative Process; Bank Examination
287	8/7/2008	Dickerson, Christopher	DeLeo, Wanda			Draft mortgage market note containing OFHEO pre-decisional deliberations regarding GSE capital types and requirements.	Deliberative Process
288	8/7/2008	Dickerson, Christopher	Pearl, David, Newell, Jamie; Fernandez, Maria; Murphy, Stephen			Email communication among senior OFHEO staff discussing information provided by Freddie Mac at the request of OFHEO in its supervisory capacity regarding losses on option adjustable rate mortgages	Deliberative Process; Bank Examination
289	8/7/2008	Dickerson, Christopher	Pearl, David, Newell, Jamie; Fernandez, Maria; Murphy, Stephen			Draft SEC Form 10-Q prepared by Fannie Mae provided to FHFA in its regulatory capacity for review and approval.	Bank Examination

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290	8/6/2008	Dickerson, Christopher	Lawler, Patrick			Draft SEC Form 10-Q prepared by Fannie Mae and provided to FHFA in its regulatory capacity for review and approval.	Bank Examination
291	8/6/2008	Dickerson, Christopher	DeLeo, Wanda	Tagoe, Naa Awaa; Satriano, Nicholas; Eller, Gregory	Thomas, Jason; Hennessey, Keith; Blahous, Charles P.; Marron, Donald B.; McMillin, Stephen S.; Nason, David; Norton, Jeremiah; Ryan, Tony; Warsh, Kevin; Swanson, Jonathan W.; Lockhart, James	Email communication reflecting pre-decisional deliberations regarding assessment of GSE solvency	Deliberative Process; Presidential Privilege
292	8/6/2008	Dickerson, Christopher	DeLeo, Wanda; Tagoe, Naa Awaa; Satriano, Nicholas		Lockhart, James; DeMarco, Edward; Thomas, Jason; Hennessey, Keith; Blahous, Charles; Marron, Donald; McMillin, Stephen; Nason, David; Norton, Jeremiah; Ryan, Tony; Warsh, Kevin; Swanson, Jonathan	Email communication reflecting pre-decisional deliberations regarding assessment of GSE solvency	Deliberative Process; Presidential Privilege
293	8/4/2008	Dickerson, Christopher	Newell, Jamie; Kerr, John		Benson, David; Levin, Robert; Senhauser, William*; Niculescu, Peter; Dallavecchia, Enrico	Letter from Fannie Mae to FHFA relating to FHFA's regulatory supervision and providing information requested in FHFA's Supervisory Letter regarding Fannie Mae's Liquidity Management Plan.	Bank Examination
294	8/4/2008	Dickerson, Christopher	Newell, Jamie; Kerr, John			Document created by Fannie Mae and provided to FHFA relating to FHFA's regulatory supervision and providing information requested in FHFA's Supervisory Letter regarding Fannie Mae's Liquidity Management Plan.	Bank Examination
295	7/31/2008	Dickerson, Christopher	Young, Doncella M.		DeMarco, Edward; Kerr, John; Spohn, Jeffrey; Corona, Stephen; Beckles, Erin; Keyes, Robert; Fernandez, Maria; Lockhart, James; Newell, Jamie	Email communications between OFHEO staff reflecting internal pre-decisional deliberations and providing information collected in its supervisory capacity regarding GSE loss severity.	Deliberative Process; Bank Examination
296	7/30/2008	Dickerson, Christopher	Kelly, Austin; Kerr, John; Fernandez, Maria; Tagoe, Naa Awaa; Newell, Jamie; Pearl, David			Document created by FHFA relating to its regulatory supervision of Fannie Mae regarding stress tests and capital forecast for Fannie Mae	Bank Examination
297	7/30/2008	Dickerson, Christopher	Kerr, John			Email communication between senior OFHEO staff reflecting internal pre-decisional deliberations and opinions relating to its regulatory supervision of Fannie Mae regarding Fannie Mae capital premium	Deliberative Process; Bank Examination
298	7/29/2008	Dickerson, Christopher	Spohn, Jeffrey		Lockhart, James; DeMarco, Edward;	Email communication among senior OFHEO staff providing notes of meeting with Freddie Mac and reflecting pre-decisional deliberations for the purpose of regulatory supervision capital requirements	Deliberative Process; Bank Examination
299	7/29/2008	Dickerson, Christopher	Roberts, Kyle*		Lockhart, James; DeMarco, Edward; IOS Senior Mgmt; Spohn, Jeffrey	Email communication among senior OFHEO staff providing notes of meeting with Freddie Mac and reflecting pre-decisional deliberations for the purpose of regulatory supervision capital requirements	Deliberative Process; Bank Examination

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300	7/29/2008	Dickerson, Christopher	DeLeo, Wanda; Tagoe, Naa Awa; Smith, Scott.; Newell, Jamie; Roberts, Kyle*; Fernandez, Maria			Draft SEC Form 10Q prepared by Freddie Mac and provided to FHFA in its regulatory capacity for review and approval	Bank Examination
301	7/28/2008	Dickerson, Christopher	Newell, Jamie; Pearl, David; Fernandez, Maria; Spohn, Jeffrey			Draft Audit Committee presentation created by Freddie Mac and provided to OFHEO for regulatory review and approval regarding single family loan loss reserves	Bank Examination
302	7/28/2008	Dickerson, Christopher	Newell, Jamie; Pearl, David; Fernandez, Maria; Spohn, Jeffrey			Draft Audit Committee presentation created by Freddie Mac and provided to OFHEO for regulatory review and approval regarding impairments on securities	Bank Examination
303	7/28/2008	Dickerson, Christopher	Newell, Jamie; Pearl, David; Fernandez, Maria; Spohn, Jeffrey		Armstrong, Tim	Draft management documentation memo created by Freddie Mac and provided to OFHEO for regulatory review and approval regarding Freddie Mac's other than temporary impairments	Bank Examination
304	7/28/2008	Dickerson, Christopher	Roberts, Toi			Presentation providing OFHEO pre-decisional deliberations and supervisory concerns regarding the financial condition of the GSEs	Deliberative Process; Bank Examination
305	7/26/2008	Dickerson, Christopher	Dickerson, Christopher			Presentation providing OFHEO pre-decisional deliberations and supervisory concerns regarding the financial condition of the GSEs	Deliberative Process; Bank Examination
306	7/18/2008	Dickerson, Christopher	Dickerson, Christopher			Presentation prepared by OFHEO reflecting pre-decisional deliberations relating to its regulatory supervision of the GSEs regarding GSE quarterly risk assessment and market risk rating	Deliberative Process; Bank Examination
307	7/15/2008	Dickerson, Christopher	Dickerson, Christopher			Presentation created by Freddie Mac and provided to OFHEO for OFHEO to provide supervisory comments and recommendations regarding credit losses related to the guarantee fee business	Bank Examination
308	7/21/2008	Dickerson, Christopher	Dickerson, Christopher			Presentation prepared by OFHEO reflecting pre-decisional deliberations relating to its regulatory supervision of the GSEs regarding GSE quarterly risk assessment and earnings rating	Deliberative Process; Bank Examination
309	7/26/2008	Dickerson, Christopher	Dickerson, Christopher		Spohn, Jeffrey; Kelly, Austin; Fernandez, Maria; Kerr, John; Roberts, Kyle*; DeLeo, Wanda; Tagoe, Naa Awa; Smith, Scott	Email communication between senior OFHEO officials providing OFHEO pre-decisional deliberations relating to its regulatory supervision regarding GSE credit risk rating	Deliberative Process; Bank Examination
310	7/20/2008	Dickerson, Christopher	Dickerson, Christopher			Presentation prepared by OFHEO reflecting pre-decisional deliberations relating to its regulatory supervision of the GSEs regarding GSE quarterly risk assessment and credit risk rating	Deliberative Process; Bank Examination
311	7/22/2008	Dickerson, Christopher	Dickerson, Christopher			Presentation notes prepared by OFHEO reflecting pre-decisional deliberations relating to its regulatory supervision of the GSEs regarding GSE composite risk ratings	Deliberative Process; Bank Examination
312	7/18/2008	Dickerson, Christopher	Dickerson, Christopher			Presentation prepared by OFHEO reflecting pre-decisional deliberations relating to its regulatory supervision of the GSEs regarding GSE quarterly risk assessment and model risk rating	Deliberative Process; Bank Examination

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313	7/22/2008	Dickerson, Christopher	Newell, Jamie	Kvartunas, Deirdre		Draft supervisory letter prepared by OFHEO reflecting pre-decisional deliberations and recommendations in connection with regulatory supervision regarding Freddie Mac's liquidity position and liquidity management plan	Deliberative Process; Bank Examination
314	7/22/2008	Dickerson, Christopher	Newell, Jamie	Kvartunas, Deirdre		Draft supervisory letter prepared by OFHEO reflecting pre-decisional deliberations and recommendations in connection with regulatory supervision regarding Fannie Mae's liquidity position and liquidity management plan	Deliberative Process; Bank Examination
315	7/15/2008	Dickerson, Christopher	DeLeo, Wanda; Tagoe, Naa Awaa			Presentation created by Fannie Mae and providing OFHEO information necessary to conduct regulatory supervision regarding Fannie Mae's 2nd quarter 2008 loss reserves	Bank Examination
316	7/15/2008	Dickerson, Christopher	DeLeo, Wanda; Tagoe, Naa Awaa			Presentation created by Fannie Mae and providing OFHEO information necessary to conduct regulatory supervision regarding Fannie Mae's 2nd quarter 2008 loss reserves	Bank Examination
317	7/14/2008	Dickerson, Christopher	Pearl, David		Newell, Jamie; Kvartunas, Deirdre; Stofferson, Robert; Fernandez, Maria; Kerr, John; Spohn, Jeffrey; Murphy, Stephen; Doherty, Brian	Communication among OFHEO reflecting pre-decisional deliberations relating to its regulatory supervision of the GSEs regarding GSE liquidity facilities and bond trading	Deliberative Process; Bank Examination
318	7/13/2008	Dickerson, Christopher	Lockhart, James		DeMarco, Edward	Email communication among senior OFHEO staff reflecting internal pre-decisional deliberations regarding proposed draft press statement concerning the financial condition and capital requirements of the GSEs	Deliberative Process
319	7/12/2008	Dickerson, Christopher	Newell, Jamie; Kvartunas, Deirdre; Stofferson, Robert			Call notes containing pre-decisional deliberations of the Federal Reserve Board analyzing the assets and resources of Fannie Mae and Freddie Mac	Deliberative Process
320	7/11/2008	Dickerson, Christopher	Lockhart, James		DeLeo, Wanda; Johnson, Mary; DeMarco, Edward; Newell, Jamie; Tagoe, Naa Awaa; Smith, Scott; Varrieur, Andrew; Zaenger, Eileen; McNicholas, John; Nelson, Adam	Internal email communication among OFHEO staff relating to its regulatory supervision of the GSEs regarding the financial condition and capital levels of the GSEs	Bank Examination
321	7/10/2008	Dickerson, Christopher	Johnson, Mary		Mullin, Stefanie; Lockhart, James; DeMarco, Edward; Pollard, Alfred*; Lawler, Patrick; Hanley, Joanne; Russell, Corinne	Email communication reflecting OFHEO pre-decisional deliberations relating to its regulatory supervision of the GSEs and requesting Alfred Pollard*'s legal review and approval regarding proposed draft press release and capital position of the GSEs	Attorney Client; Deliberative Process; Bank Examination
322	7/10/2008	Dickerson, Christopher	Johnson, Mary			Draft press release reflecting OFHEO pre-decisional deliberations relating to its regulatory supervision of the GSEs and provided for Alfred Pollard*'s legal review and approval regarding capital position of the GSEs	Attorney Client; Deliberative Process; Bank Examination
323	6/18/2008	Dickerson, Christopher	DeLeo, Wanda		Lockhart, James; Johnson, Mary; DeMarco, Edward; Smith, Scott	Memorandum providing OFHEO opinions, recommendations, and pre-decisional deliberations prepared for the purpose of regulatory oversight regarding OFHEO meeting with Freddie Mac concerning minimum capital compliance requirements	Deliberative Process; Bank Examination

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324	6/16/2008	Dickerson, Christopher	OS Senior Mgmt		Syron, Richard; Lockhart, James; Pizel, Anthony; Weiss, Jerry; Dickerson, Christopher; Spohn, Jeffrey; Tagoe, Naa Awaa	Supervisory Letter to Freddie Mac containing OFHEO supervisory recommendations regarding Freddie Mac's liquidity and capital requirements	Bank Examination
325	6/16/2008	Dickerson, Christopher	OS Senior Mgmt		Mudd, Daniel; Lockhart, James; Swad. Stephen; Senhauser, William*; Kerr, John; Tagoe, Naa Awaa	Supervisory Letter to Fannie Mae containing OFHEO supervisory recommendations regarding Fannie Mae's liquidity and capital requirements	Bank Examination
326	10/14/2008	Dickerson, Christopher	Tagoe, Naa Awaa		MARKET RISK TEAM; Newell, Jamie; Lockhart, James; DeMarco, Edward	RM: Email communication among FHFA staff reflecting pre-decisional deliberations relating to its regulatory supervision of the GSEs regarding GSE debt issuance limit and liquidity requirements	Deliberative Process; Bank Examination
327	9/24/2008	Dickerson, Christopher	Alvarez, Scott*	Pollard, Alfred*	Clark, Tim; Crisp, Stan; Coffey, Kevin; Downey, Chris; Martin, Jody; Moise; Michael; Torraca, Chris	Draft memorandum prepared by the Federal Reserve Board staff and containing Federal Reserve Board and OFHEO pre-decisional deliberations regarding Freddie Mac's risk profile and forecasted potential losses	Deliberative Process
328	9/26/2008	Dickerson, Christopher	Alvarez, Scott*	Pollard, Alfred*	Clarke, Kevin; Robles, Jeffrey; Cordell, Larry; Mayhew, Frank; Reid, James; Biedermann, Bradley	Draft memorandum prepared by the Federal Reserve Board staff and containing Federal Reserve Board and OFHEO pre-decisional deliberations regarding Fannie Mae's risk profile and forecasted potential losses	Deliberative Process
329	10/10/2008	Dickerson, Christopher	Tagoe, Naa Awaa		Wisdom, Paige; Zou, Peter	Email communication between Freddie Mac and FHFA relating to FHFA's regulatory supervision of Freddie Mac regarding Freddie Mac shareholders' equity	Bank Examination
330	10/9/2008	Dickerson, Christopher	Roberts, Toi			Presentation prepared by Fannie Mae and provided to OFHEO relating to its regulatory supervision of the GSEs regarding management of Fannie Mae's loan loss reserves	Bank Examination
331	10/9/2008	Dickerson, Christopher	Roberts, Toi		McCluskey, Karen	Analysis memorandum providing OFHEO pre-decisional deliberations relating to its regulatory supervision of the GSEs regarding examination of Freddie Mac's loan loss reserves	Deliberative Process; Bank Examination
332	10/9/2008	Dickerson, Christopher	Roberts, Toi			Presentation prepared by Freddie Mac and provided to FHFA for the purpose of regulatory oversight regarding loan loss reserve overview	Bank Examination
333	10/9/2008	Dickerson, Christopher	Roberts, Toi			Presentation prepared by Freddie Mac and provided to OFHEO in relation to its regulatory supervision regarding monitoring GSE's credit loss severity trends	Bank Examination
334	10/9/2008	Dickerson, Christopher	Roberts, Toi		Khaleque, Farzana	Analysis memorandum providing OFHEO pre-decisional deliberations relating to its regulatory oversight of the GSEs regarding examination of Freddie Mac's model risk	Deliberative Process; Bank Examination
335	10/9/2008	Dickerson, Christopher	Roberts, Toi			Presentation prepared by Freddie Mac and provided to OFHEO in relation to its regulatory supervision of the GSEs regarding examination of Freddie Mac's loan loss reserve forecast	Bank Examination
336	10/9/2008	Dickerson, Christopher	Roberts, Toi			Presentation prepared by Freddie Mac and provided to OFHEO in relation to its regulatory supervision regarding Freddie Mac credit loss and loan loss reserves	Bank Examination

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337	9/4/2008	Dickerson, Christopher	Roberts, Kyle*			Draft supervisory letter containing FHFA pre-decisional deliberations relating to FHFA's regulatory oversight of the GSEs regarding Freddie Mac's composite rating and financial condition for the first half of 2008.	Deliberative Process; Bank Examination
338	12/17/2008	Dickerson, Christopher	Smith, Scott			Report prepared by Freddie Mac and provided to FHFA in its regulatory capacity regarding Freddie Mac shareholders' equity and securities classification	Bank Examination
339	12/17/2008	Dickerson, Christopher	Smith, Scott			Report prepared by Freddie Mac and provided to FHFA in its regulatory capacity regarding Freddie Mac shareholders' equity and securities classification	Bank Examination
340	12/17/2008	Dickerson, Christopher	Smith, Scott			Report prepared by Freddie Mac and provided to FHFA in its regulatory capacity regarding Freddie Mac shareholders' equity and securities classification	Bank Examination
341	12/17/2008	Dickerson, Christopher	Smith, Scott			Report prepared by Freddie Mac and provided to FHFA in its regulatory capacity regarding Freddie Mac shareholders' equity and securities classification	Bank Examination
342	12/17/2008	Dickerson, Christopher	Smith, Scott			Report prepared by Freddie Mac and provided to FHFA in its regulatory capacity regarding Freddie Mac shareholders' equity and securities classification	Bank Examination
343	12/17/2008	Dickerson, Christopher	Smith, Scott			Report prepared by Freddie Mac and provided to FHFA in its regulatory capacity regarding Freddie Mac shareholders' equity and securities classification	Bank Examination

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344	12/4/2008	Dickerson, Christopher	Kvartunas, Deirdre; Akuete, Nii Ama; Millman, Phillip; Walker, Jeffrey; Mehta, Vikas; Sugarman, Ron; Calhoun, Peter; Barabasz, Andrew; Lockhart, James; DeMarco, Edward; Spohn, Jeffrey; Kerr, John; Newell, Jamie; Roberts, Kyle*; Eldarrat, Abdalla; Eldarrat, Christopher; Lintecum, Lisa; Phillips, Steve; Pollard, Alfred*; Tagoe, Naa Awaa; Smith, Scott; Keyes, Robert; Johnson, Melinda; DeLeo, Wanda; Satriano, Nicholas; Stauffer, Lawrence; Pearl, David; Conger, Nicholas; Friedman, Timothy; Stofferson, Robert; Woody, Adam; Eller, Gregory; Fernandez, Maria; Heller, Timothy; Zhang, Min; Barnes, Kenneth; Gogol, Pamela; Hynes, Robert			Internal pre-decisional document relating to FHFA's regulatory oversight and containing agency advisory opinions, recommendations and deliberations regarding Freddie Mac and Fannie Mae's market risk analysis and summary.	Deliberative Process; Bank Examination
345	11/19/2008	Dickerson, Christopher	Roberts, Toi			Draft conclusion letter to Freddie Mac prepared by FHFA containing FHFA pre-decisional deliberations relating to its regulatory supervision regarding FHFA examination of Freddie Mac's loan loss reserve accounting policies	Deliberative Process; Bank Examination
346	11/13/2008	Dickerson, Christopher	Lockhart, James	Tagoe, Naa Awaa; Smith, Scott		Email communication among senior FHFA staff containing FHFA pre-decisional deliberations, recommendations and opinions regarding a proposal to issue proprietary preferred stock for the GSEs	Deliberative Process; Bank Examination
347	11/13/2008	Dickerson, Christopher	Lockhart, James	Tagoe, Naa Awaa; Smith, Scott		Internal document containing FHFA pre-decisional deliberations, recommendations and opinions regarding a proposal to issue proprietary preferred stock for the GSEs	Deliberative Process
348	11/7/2008	Dickerson, Christopher	Fernandez, Maria			Draft presentation created by Fannie Mae and provided to FHFA for regulatory review and approval regarding Fannie Mae's 2008 SEC Form 10-Q and its financial performance	Bank Examination
349	11/6/2008	Dickerson, Christopher	Newell, Jamie			Email communication containing FHFA pre-decisional deliberations in relation to its regulatory supervision of the GSEs regarding mortgage-backed securities put to Treasury option	Deliberative Process; Bank Examination
350	11/6/2008	Dickerson, Christopher	Roberts, Toi			Draft supervisory letter containing FHFA pre-decisional deliberations in relation to its regulatory supervision regarding Fannie Mae's allowance for loan losses	Deliberative Process; Bank Examination

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351	11/6/2008	Dickerson, Christopher	Roberts, Toi			Draft supervisory letter containing FHFA pre-decisional deliberations in relation to its regulatory supervision regarding Fannie Mae's allowance for loan losses	Deliberative Process; Bank Examination
352	10/29/2008	Dickerson, Christopher	Cross, Stephen			Presentation containing FHFA pre-decisional deliberations in relation to its regulatory supervision of the GSEs regarding the financial condition of the GSEs and critical supervision issues	Deliberative Process; Bank Examination
353	10/24/2008	Dickerson, Christopher	Tagoe, Naa Awaa			Presentation containing FHFA pre-decisional deliberations in relation to its regulatory supervision of the GSEs regarding the financial condition of the GSEs and critical supervision issues	Deliberative Process; Bank Examination
354	10/22/2008	Dickerson, Christopher	Tagoe, Naa Awaa			Presentation containing FHFA pre-decisional deliberations in relation to its regulatory supervision of the GSEs regarding the financial condition of the GSEs and critical supervision issues	Deliberative Process; Bank Examination
355	10/22/2008	Dickerson, Christopher	Lockhart, James; DeMarco, Edward		MacKenzie, Kevin*; Pollard, Alfred*; Roderer, David*; Spohn, Jeffrey; Brereton, Peter; Bostrom, Robert*; Dye, John*	Email communication between FHFA and Freddie Mac reflecting Kevin MacKenzie*'s legal advice and provided for Alfred Pollard*'s legal advice and FHFA regulatory review and approval regarding disclosure committee drafts for the September 2008 monthly volume summary	Attorney Client; Bank Examination
356	10/22/2008	Dickerson, Christopher	Lockhart, James; DeMarco, Edward			Draft presentation prepared by Freddie Mac and provided for Alfred Pollard*'s legal advice and FHFA regulatory review and approval regarding potential disclosure of the September 2008 monthly volume summary	Attorney Client; Deliberative Process; Bank Examination
357	10/17/2008	Dickerson, Christopher	IOS Senior Mgmt		DeLeo, Wanda	Memorandum reflecting FHFA pre-decisional deliberations in relation to its regulatory supervision of the GSEs regarding accounting issues with the GSEs and valuation of Treasury warrant and senior preferred shares	Deliberative Process; Bank Examination
358	10/20/2008	Dickerson, Christopher	Seiler, Robin			Draft question and answers containing FHFA pre-decisional deliberations regarding issuance of GSE long-term debt	Deliberative Process
359	4/9/2008	Montoya, Bobbi	Berkland, Dan	Anderson, Philip; Roberts, Kyle*; Dickerson, Christopher		Risk assessment memorandum containing FHFA pre-decisional deliberations in relation to its regulatory supervision of the GSEs regarding governance risk ratings for Fannie Mae	Deliberative Process; Bank Examination
360	4/9/2008	Montoya, Bobbi	Berkland, Dan	Anderson, Philip; Roberts, Kyle*; Dickerson, Christopher		Risk assessment memorandum containing FHFA pre-decisional deliberations in relation to its regulatory supervision of the GSEs regarding governance risk ratings for Fannie Mae	Deliberative Process; Bank Examination
361	4/8/2008	Lockhart, James	Mullin, Stefanie; !OER ; DeMarco, Edward; Pollard, Alfred*; Dickerson, Christopher			RM: Email communication requesting legal advice from Alfred Pollard* and reflecting OFHEO pre-decisional deliberations regarding to potential response to media article concerning GSE capital requirements and fund-raising efforts	Attorney Client; Deliberative Process
362	4/8/2008	Roberts, Toi	Tagoe, Naa Awaa; Dickerson, Christopher; Kerr, John; Spohn, Jeffrey	Foil, Maria; Conger, Faith; Thaxton, Sarah	Mudd, Daniel; Lockhart, James; Swad, Stephen; Senhauser, William*	Letter from OFHEO to Fannie Mac prepared in relation to OFHEO's regulatory supervision of the GSEs regarding Fannie Mae earnings and capital requirements	Bank Examination
363	4/8/2008	Roberts, Toi	Tagoe, Naa Awaa; Dickerson, Christopher; Kerr, John; Spohn, Jeffrey	Foil, Maria; Conger, Faith; Thaxton, Sarah	Syron, Richard; Lockhart, James; Pizsel, Anthony; Weiss, Jerry	Letter from OFHEO to Freddie Mac prepared in relation to OFHEO's regulatory supervision of the GSEs regarding Freddie Mac earnings and capital requirements	Bank Examination

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364	4/8/2008	Hamilton-Brown, Jascy	Dickerson, Christopher			Draft report containing OFHEO pre-decisional deliberations in relation to its regulatory oversight of the GSEs regarding OFHEO's annual risk examination of Freddie Mac	Deliberative Process; Bank Examination
365	4/7/2008	Millman, Philip	Murphy, Stephen; Barabasz, Andrew; Calhoun, Peter; DeMarco, Edward; Dickerson, Christopher; Doherty, Brian; Johnson, Melinda; Kerr, John; Kwartunas, Deirdre; Laughery, Scott; Lawler, Patrick; Lockhart, James; Millman, Philip; Newell, Jamie; Pearl, David; Smith, Scott; Spohn, Jeffrey; Stofferson, Robert; Sugarman, Ronald; Tagoe, Naa Awaa; Taylor, Mary Ellen; Walker, Jeffrey; Wisz, Gerald; Woody, Adam; Freidman, Timothy			Internal pre-decisional Meeting Notes providing agency opinions, recommendations and deliberations regarding OFHEO's examination of Fannie Mae's market interest rate risk	Deliberative Process; Bank Examination
366	7/14/2008	DeLeo, Wanda	Newell, Jamie	Dickerson, Christopher		Draft SEC Form 10 prepared by Freddie and provided to FHFA in its regulatory capacity for review and approval	Bank Examination
367	7/14/2008	DeLeo, Wanda	Newell, Jamie	Dickerson, Christopher		Draft SEC Form 10 prepared by Freddie and provided to FHFA in its regulatory capacity for review and approval	Bank Examination
368	7/13/2008	Lockhart, James	Dickerson, Christopher		DeMarco, Edward	Email communication among senior OFHEO staff reflecting internal pre-decisional deliberations regarding proposed draft press statement concerning the financial condition and capital requirements of the GSEs	Deliberative Process
369	7/29/2008	Spohn, Jeffrey	IOS Senior Mgmt		Cogswell, Donna; Bostrom, Robert*; Pollard, Alfred*; Weiss, Jerry; Dickerson, Christopher; Brereton, Peter; MacKenzie, Kevin*	Email communication providing information necessary for FHFA to provide regulatory review and approval regarding Freddie Mac's draft SEC Form 10Q	Bank Examination
370	8/8/2008	Newell, Jamie	Wambeke, Carol A.; Kwartunas, Deirdre; Dickerson, Christopher	Federico, Peter J.; Bitsberger, Timothy S.; Fishman, Robert J.; Aboff, Bruce; Singh, Manoj K.		Email communication between OFHEO and Freddie Mac requesting information required by OFHEO in order to conduct examination of Freddie Mac's liquidity management	Bank Examination
371	8/6/2008	Hamilton-Brown, Jascy	DeMarco, Edward; Dickerson, Christopher; Pollard, Alfred*			Draft press statement reflecting FHFA pre-decisional deliberations regarding GSE minimum capital and risk-based capital requirements	Deliberative Process
372	8/6/2008	DeLeo, Wanda	Dickerson, Christopher	Tagoe, Naa Awaa; Satriano, Nicholas; Eller, Gregory	Lockhart, James; DeMarco, Edward; Thomas, Jason; Hennessey, Keith; Blahous, Charles; Marron, Donald; McMillin, Stephen; Nason, David; Norton, Jeremiah; Ryan, Tony; Warsh, Kevin; Swanson, Jonathan	Email communication reflecting pre-decisional deliberations regarding assessment of GSE solvency	Deliberative Process; Presidential Privilege

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373	8/27/2008	Pollard, Alfred*	Lockhart, James; Dickerson, Christopher; Spohn, Jeffrey; Kerr, John; Roberts, Kyle*; Lawler, Patrick	Felt, David*		Draft Supervisory Letter reflecting Alfred Pollard*'s legal advice and FHFA pre-decisional deliberations regarding the financial and governing condition of Freddie Mac	Attorney Client; Deliberative Process; Bank Examination
374	8/26/2008	Kerr, John	Lockhart, James; Pollard, Alfred*; Dickerson, Christopher			Supervisory document containing FHFA pre-decisional deliberations in relation to its regulatory supervision of the GSEs and provided for Alfred Pollard*'s legal advice regarding examination of the financial condition, management, and capitalization of Fannie Mae	Attorney Client; Deliberative Process; Bank Examination
375	8/26/2008	Roberts, Toi	Dickerson, Christopher		Mudd, Daniel; Senhauser, William*	Supervisory letter from FHFA in their capacity as a regulator to Fannie Mae containing agency opinions and recommendations regarding the mid-year review of Fannie Mae's financial condition	Bank Examination
376	8/26/2008	Roberts, Toi	Dickerson, Christopher		Mudd, Daniel; Senhauser, William*	Supervisory letter from FHFA in their capacity as a regulator to Fannie Mae containing agency opinions and recommendations regarding the mid-year review of Fannie Mae's financial condition	Bank Examination
377	8/26/2008	Roberts, Toi	Dickerson, Christopher		Syron, Richard; Weiss, Jerry	Supervisory letter from FHFA in their capacity as a regulator to Freddie Mac containing agency opinions and recommendations regarding the mid-year review of Freddie Mac's financial condition	Bank Examination
378	8/26/2008	DeLeo, Wanda	Pollard, Alfred*	Roberts, Kyle*; Spohn, Jeffrey; Dickerson, Christopher		Draft Supervisory Letter reflecting FHFA pre-decisional deliberations in its regulatory capacity and provided to Alfred Pollard* for his legal advice regarding the financial condition and soundness of Freddie Mac for the FHFA administrative record	Attorney Client; Deliberative Process; Bank Examination
379	8/26/2008	Roberts, Kyle*	Pollard, Alfred*	Spohn, Jeffrey; DeLeo, Wanda; Dickerson, Christopher		Draft Supervisory Letter reflecting FHFA pre-decisional deliberations in its regulatory capacity and provided to Alfred Pollard* for his legal advice regarding the financial condition and soundness of Freddie Mac for the FHFA administrative record	Attorney Client; Deliberative Process; Bank Examination
380	8/24/2008	Juhas, Peter	Dickerson, Christopher		DeLeo, Wanda	Email communication between FHFA and consultant for Treasury containing pre-decisional deliberations on the financial condition of Freddie Mac	Deliberative Process
381	6/5/2012	Lawler, Patrick	Wright, Frank*			Draft agreement reflecting FHFA pre-decisional deliberations and providing information necessary for counsel to facilitate the provision of legal advice regarding proposed amendments to the SPSA	Attorney Client; Deliberative Process
382	8/26/2008	Manchester, Paul B	Lawler, Patrick			Draft Economic Survey of the U.S. by the Organization for Economic Co-operation and Development containing interagency pre-decisional deliberations regarding the financial condition of the U.S. economy including specific discussions of the financial conditions of the GSEs	Deliberative Process
383	8/26/2008	Pollard, Alfred*	Hoyt, Robert*; Alvarez, Scott*	Alexander, Richard*		Draft Supervisory Letter prepared by FHFA and reflecting Alfred Pollard*'s legal advice and FHFA's pre-decisional deliberations and recommendations in its regulatory capacity regarding Freddie Mac's financial condition and credit quality	Attorney Client; Deliberative Process; Bank Examination
384	8/26/2008	Pollard, Alfred*	Hoyt, Robert*; Alvarez, Scott*	Alexander, Richard*		Draft Supervisory Letter prepared by FHFA and reflecting Alfred Pollard*'s legal advice and FHFA's pre-decisional deliberations and recommendations in its regulatory capacity regarding Fannie Mae's financial condition and credit quality	Attorney Client; Deliberative Process; Bank Examination

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"*" Denotes Attorney/Legal Personnel

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Privilege Log 002 (FHFA)

Log Line ID	Date	From / Author	To / Recipient	CC	Additional Recipients	Description	Privilege Assertion
385	6/11/2012	Ugoletti, Mario	Pollard, Alfred; Laponsky, Mark*; Lawler, Patrick; Greenlee, Jon; Burns, Meg; Spohn, Jeffrey; Newell, Jamie; Satriano, Nicholas			Email communication among senior FHFA staff reflecting FHFA internal pre-decisional deliberations and requesting counsel Mark Laponsky*'s legal advice regarding proposed terms for the Third Amendment to the SPSPA	Attorney Client; Deliberative Process
386	5/3/2012	Chen, Yiping (Cindy)	Bakel, Pete	Satriano, Nicholas; Griffin Jr., James; Lewis, Stephen; Chen, Yiping (Cindy)		Draft press release prepared by Fannie Mae and reflecting FHFA regulatory recommendations and comments as to Fannie Mae's first quarter 2012 statement	Bank Examination
387	7/19/2011	Ugoletti, Mario	Anderson, Philip; Lewis, Stephen; McNicholas, John; Satriano, Nicholas; Schwing, Jamie*	Spohn, Jeffrey		RM: Email communication among FHFA staff reflecting the request for Jamie Schwing*'s legal advice and containing pre-decisional deliberations regarding GSE draw requests and deficiency amounts	Attorney Client; Deliberative Process
388	7/19/2011	Ugoletti, Mario	Satriano, Nicholas; Lewis, Stephen; McNicholas, John; Anderson, Philip; Schwing, Jamie*	Spohn, Jeffrey		RM: Email communication among FHFA staff reflecting the request for Jamie Schwing*'s legal advice and containing pre-decisional deliberations regarding GSE draw requests and deficiency amounts	Attorney Client; Deliberative Process
389	6/23/2011	Ugoletti, Mario	Spohn, Jeffrey; Schwing, Jamie*; Anderson, Philip; McNicholas, John; Lewis, Stephen; Satriano, Nicholas			Email communication among FHFA staff requesting Jamie Schwing*'s legal advice regarding proposed draft SPSPA draw letter	Attorney Client
390	4/30/2012	Satriano, Nicholas	Griffin Jr., James			Presentation prepared by FHFA relating to its regulatory supervision of the GSEs as to the GSEs financial statement reviews	Bank Examination
391	8/8/2008	Satriano, Nicholas	Eller, Gregory		Stauffer, Lawrence; Lewis, Stephen; DeLeo, Wanda; Dickerson, Christopher; Tagoe, Naa Awaa; DeMarco, Edward; Lockhart, James; DeMarco, Edward; Thomas, Jason; Hennessey, Keith; Blahous, Charles; Marron, Donald; McMillin, Stephen; Nason, David; Norton, Jeremiah; Ryan, Tony; Warsh, Kevin; Swanson, Jonathan	Email communication reflecting pre-decisional deliberations regarding assessment of GSE solvency	Deliberative Process; Presidential Privilege
392	10/31/2008	Satriano, Nicholas	DeLeo, Wanda; Stauffer, Lawrence; Eller, Gregory			RM: Email communication among senior FHFA staff reflecting FHFA pre-decisional deliberations regarding valuation assessment related to potential Freddie Mac draws under the SPSPA	Deliberative Process
393	10/31/2008	Satriano, Nicholas	Lewis, Stephen		DeLeo, Wanda	Memorandum from FHFA Accounting Policy Team reflecting FHFA pre-decisional deliberations and supervisory actions and examinations regarding GSE financial disclosures and accounting for the Treasury commitment	Deliberative Process; Bank Examination
394	11/6/2008	Satriano, Nicholas	Stauffer, Lawrence		Eller, Gregory; DeLeo, Wanda; Smith, Scott	RM: Email communication among senior FHFA staff and reflecting FHFA pre-decisional deliberations regarding potential Treasury draws and disclosures to Treasury	Deliberative Process

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395	8/7/2008	Eller, Gregory	DeLeo, Wanda; Satriano, Nicholas; Lewis, Stephen; Stauffer, Lawrence		Lockhart, James; DeMarco, Edward; Thomas, Jason; Hennessey, Keith; Blahous, Charles; Marron, Donald; McMillin, Stephen; Nason, David; Norton, Jeremiah; Ryan, Tony; Warsh, Kevin; Swanson, Jonathan	Email communication reflecting pre-decisional deliberations regarding assessment of GSE solvency	Deliberative Process; Presidential Privilege
396	8/11/2008	Eller, Gregory	DeLeo, Wanda	Satriano, Nicholas	DeMarco, Edward; Dickerson, Christopher; Stauffer, Lawrence; Lewis, Stephen; Tagoe, Naa Awaa; Lockhart, James; DeMarco, Edward; Thomas, Jason; Hennessey, Keith; Blahous, Charles; Marron, Donald; McMillin, Stephen; Nason, David; Norton, Jeremiah; Ryan, Tony; Warsh, Kevin; Swanson, Jonathan	Email communication reflecting pre-decisional deliberations regarding assessment of GSE solvency	Deliberative Process; Presidential Privilege
397	10/31/2008	Stauffer, Lawrence	DeLeo, Wanda	Eller, Gregory; Satriano, Nicholas	DeMarco, Edward; Smith, Scott	RM: Email communication among senior FHFA staff reflecting FHFA pre-decisional deliberations regarding valuation assessment related to potential Freddie Mac draws under the SPSPA	Deliberative Process
398	11/6/2008	DeLeo, Wanda	Stauffer, Lawrence; Eller, Gregory; Satriano, Nicholas		Smith, Scott	RM: Email communication among senior FHFA staff and reflecting FHFA pre-decisional deliberations regarding potential Treasury draws and disclosures to Treasury	Deliberative Process
399	7/13/2008	Lockhart, James	DeMarco, Edward		Dickerson, Christopher	Email communication among senior OFHEO staff reflecting internal deliberations regarding proposed draft press statement regarding the financial condition and capital requirements of the GSEs	Deliberative Process
400	8/15/2008	Norton, Jeremiah	Lockhart, James; DeMarco, Edward			Email communication between FHFA and Treasury reflecting pre-decisional deliberations regarding the financial condition of the GSEs	Deliberative Process
401	8/15/2008	Norton, Jeremiah	Lockhart, James; DeMarco, Edward			Presentation prepared by consultant for Treasury for the purpose of assisting with Treasury deliberations on the financial conditions of the GSEs	Deliberative Process
402	8/23/2008	Norton, Jeremiah	Lockhart, James; DeMarco, Edward	Albrecht, Stephen; Ryan, Tony	Singh, Shelley; Brown, Steven	Email communication between FHFA and Treasury staff providing documents prepared by consultant for Treasury for the purpose of assisting Treasury and FHFA deliberations on the financial conditions of the GSEs	Deliberative Process
403	9/5/2008	Fiol, Maria	Ryan, Tony; Jester, Dan; Davis, Michele; DeMarco, Edward; Pollard, Alfred*			Draft document reflecting FHFA Director Lockhart's pre-decisional deliberations regarding FHFA's capital concerns for the GSEs and placement of the GSEs into conservatorship	Deliberative Process
404	8/30/2008	Lockhart, James	DeMarco, Edward			Presentation prepared by consultant for Treasury containing deliberations on the financial conditions of the GSEs	Deliberative Process; Bank Examination
405	8/6/2008	Lockhart, James	Ryan, Tony; Davis, Michele	DeMarco, Edward		Email communication between FHFA and Treasury reflecting pre-decisional deliberations regarding oversight of Freddie Mac and their current capitalization	Deliberative Process; Bank Examination

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406	9/6/2008	Glassman, Mitchell	Covino, Rocco*	DeMarco, Edward		Email communication between staff at FHFA and FDIC providing information necessary for counsel Rocco Covino* to render legal advice and reflecting agency deliberations regarding the structure of the GSEs under conservatorship	Attorney Client; Deliberative Process
407	11/28/2008	Russell, Corinne	Lockhart, James	DeMarco, Edward; Brereton, Peter; Hanley, Joanne; Mullin, Stefanie		RM: Email communication between FHFA senior staff reflecting pre-decisional deliberations regarding comments to draft Washington Post story	Deliberative Process
408	11/26/2008	Lockhart, James	Mullin, Stefanie; Russell, Corinne	Brereton, Peter; DeMarco, Edward		RM: Email communication between FHFA senior staff reflecting pre-decisional deliberations regarding comments to draft Washington Post story	Deliberative Process
409	11/24/2008	Lockhart, James	Spohn, Jeffrey	DeMarco, Edward	Bostrom, Robert E.*; MacKenzie, Kevin*; Kellermann, David B ; Dye, John*; Small, Jeffrey; Lewis, William	Email communication reflecting legal advice from Freddie Mac outside counsel Davis, Polk and Wardwell* and Robert Bostrom* and requesting FHFA regulatory review regarding proposed SEC Form 8-k disclosure	Attorney Client; Bank Examination
410	11/14/2008	Tagoe, Naa Awaa	DeMarco, Edward		Schroeder, Jeannine; Habersham, Myrtle; Comenetz, Sandy	Email communication between FHFA staff reflecting pre-decisional deliberations in relation to FHFA's regulatory supervision of the GSEs regarding draft performance analysis and results and Freddie Mac's financial condition	Deliberative Process; Bank Examination
411	11/14/2008	Tagoe, Naa Awaa	DeMarco, Edward			Draft document reflecting FHFA pre-decisional deliberations in relation to its regulatory supervision of the GSEs regarding draft performance analysis and results and Freddie Mac's financial condition	Deliberative Process; Bank Examination
412	10/31/2008	Stauffer, Lawrence	DeMarco, Edward	DeLeo, Wanda; Satriano, Nicholas; Eller, Gregory; Smith, Scott		RM: Email communication among senior FHFA staff reflecting FHFA pre-decisional deliberations regarding potential Freddie Mac draws under the PSPA	Deliberative Process
413	10/29/2008	DeLeo, Wanda	Lockhart, James	DeMarco, Edward	Mullin, Stefanie; Dickerson, Christopher; Brereton, Peter; Russell, Corinne; Pollard, Alfred*; Lakroune, Amy	RM: Internal communication among senior FHFA staff containing pre-decisional deliberations regarding response to a media story on deferred tax assets of the GSEs and management delegations by the conservator	Deliberative Process
414	7/12/2008	DeMarco, Edward	Tagoe, Naa Awaa		Calhoun, Peter; Dickerson, Christopher	Email communication among senior FHFA staff relating to its regulatory supervision of the GSEs regarding estimates of minimum capital levels for the GSEs	Bank Examination
415	7/14/2008	DeMarco, Edward	Lockhart, James		Dickerson, Christopher	Email communication among senior OFHEO staff reflecting internal deliberations regarding proposed draft press statement regarding the financial condition and capital requirements of the GSEs	Deliberative Process
416	7/13/2008	DeMarco, Edward	Lockhart, James		Ryan, Tony	Email communication containing OFHEO and Treasury pre-decisional deliberations regarding proposed draft public statement concerning GSE capital levels and recommendations for Congressional action	Deliberative Process; Bank Examination
417	7/13/2008	DeMarco, Edward	Lockhart, James		Dickerson, Christopher	Email communication among senior OFHEO staff reflecting internal deliberations regarding proposed draft press statement regarding the financial condition and capital requirements of the GSEs	Deliberative Process
418	8/16/2012	Dunckel, Denise	DeMarco, Edward			Draft communication reflecting internal FHFA deliberations regarding press release for third amendment to the SPSPA	Deliberative Process
419	5/30/2012	Ugoletti, Mario	Wagner-Smith, Wendy	Taylor, Mary Ellen; DeMarco, Edward		Draft report to Federal Housing Finance Oversight Board providing pre-decisional deliberations regarding the assessment of GSEs	Deliberative Process

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Log Line ID	Date	From / Author	To / Recipient	CC	Additional Recipients	Description	Privilege Assertion
420	1/2/2012	Ugoletti, Mario	DeMarco, Edward		Hamilton-Brown, Jascy	Email communication providing FHFA pre-decisional deliberative opinion on discussions with Treasury concerning SPSPAs and next steps with the conservatorships	Deliberative Process
421	1/3/2012	DeMarco, Edward	Ugoletti, Mario		Hamilton-Brown, Jascy	Email communication providing FHFA pre-decisional deliberative opinion on discussions with Treasury concerning SPSPAs and next steps with the conservatorships	Deliberative Process
422	8/16/2012	DeMarco, Edward	Dunckel, Denise	Ugoletti, Mario		Draft press release reflecting agency pre-decisional opinions and deliberations related to the third amendment to the SPSPA	Deliberative Process
423	8/16/2012	DeMarco, Edward	Ugoletti, Mario; Dunckel, Denise			Email communication among senior FHFA staff regarding draft press release for the Third Amendment to the SPSPA	Deliberative Process
424	8/16/2012	Dunckel, Denise	Ugoletti, Mario			Email communications between senior FHFA staff reflecting internal deliberations and opinions regarding draft press release made on behalf of FHFA related to the third amendment to the SPSPA	Deliberative Process
425	5/30/2012	David, Mark	Harris, Toni; Kinsey, Mark; Ugoletti, Mario	Major, John		Draft strategic plan reflecting FHFA deliberations as to the goals of FHFA and the future of the GSEs and the Conservatorships	Deliberative Process
426	6/29/2012	Laponsky, Mark*	Sar, Prasant; Curtis, Christopher*; Burns, Meg	Ugoletti, Mario; Dunckel, Denise		Email communication among FHFA senior staff requesting and providing counsel's legal advice and containing FHFA pre-decisional deliberations regarding approval requirements under the SPSPAs for Fannie Mae business transactions	Attorney Client; Deliberative Process
427	5/9/2012	Greenlee, Jon	Ugoletti, Mario			Draft report to Federal Housing Finance Oversight Board providing pre-decisional deliberations regarding the assessment of GSEs that are in conservatorship	Deliberative Process
428	5/8/2012	DeLeo, Wanda	Ugoletti, Mario		Newell, Jamie; Graham, Fred; Stauffer, Lawrence	Email communication among senior FHFA staff reflecting internal deliberations regarding GSE SPSPA dividend payments	Deliberative Process
429	5/3/2012	DeLeo, Wanda	Ugoletti, Mario			Spreadsheet created by FHFA in its supervisory capacity in order to assist in internal deliberations regarding GSE SPSPA non-core asset estimates	Deliberative Process; Bank Examination
430	1/26/2012	Curtis, Tyler	Wardle, Alison	Seiler, Robin; Collender, Robert; Lawler, Patrick; Pafenberg, Forrest; Ugoletti, Mario; McKenzie, Joseph A.		Internal pre-decisional draft report regarding status of conservatorships	Deliberative Process; Presidential Privilege
431	10/20/2011	Tagoe, Naa Awaa	Ugoletti, Mario			Document prepared by FHFA in its supervisory capacity and reflecting FHFA internal deliberations regarding projections of the GSEs financial performance and possible Treasury draws	Deliberative Process; Bank Examination
432	8/8/2012	Ugoletti, Mario	DeMarco, Edward			Email communication among senior FHFA staff reflecting FHFA internal deliberations regarding proposed terms for the Third Amendment to the SPSPA	Deliberative Process

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Log Line ID	Date	From / Author	To / Recipient	CC	Additional Recipients	Description	Privilege Assertion
433	6/12/2012	Ugoletti, Mario	Pollard, Alfred*; Laponsky, Mark*; Spohn, Jeffrey; Greenlee, Jon; Lawler, Patrick; DeLeo, Wanda; Satriano, Nicholas; Burns, Meg; Newell, Jamie			Email communication among senior FHFA staff reflecting FHFA internal pre-decisional deliberations and requesting counsel Mark Laponsky*'s legal advice regarding proposed terms for the Third Amendment to the SPSPA	Attorney Client; Deliberative Process
434	6/1/2012	Ugoletti, Mario	Cowell, Jennifer; Laponsky, Mark*			Email communication requesting Mark Laponsky*'s legal advice regarding draft response to congressional staffer concerning Fannie Mae dividend payments	Attorney Client
435	5/10/2012	Ugoletti, Mario	Laponsky, Mark*			Email communication reflecting FHFA internal pre-decisional deliberations and requesting counsel Mark Laponsky*'s legal advice regarding proposed terms for the Third Amendment to the SPSPA	Attorney Client; Deliberative Process
436	1/10/2012	Robertson, Caroline A	Williams, John; Tagoe, Naa Awaa	Fraser, Nicola; Arsenault, Charles; Calhoun, Peter		Spreadsheet prepared by Fannie Mae at the request of FHFA in FHFA's regulatory capacity regarding analysis of Fannie Mae's financial projections with respect to g-fee estimates	Bank Examination
437	8/18/2008	Lockhart, James	Tagoe, Naa Awaa		Eldarrat, Christine; DeMarco, Edward; Dickerson, Christopher	Email communication among senior FHFA staff in its supervisory capacity of the GSEs requesting and providing information requested by Treasury relating to GSE stress tests in order to assist with agency deliberations on the financial conditions of the GSEs	Deliberative Process; Bank Examination
438	7/14/2008	Lockhart, James	DeLeo, Wanda; Tagoe, Naa Awaa		DeMarco, Edward; Mullin, Stefanie; Dickerson, Christopher	Email communication among senior OFHEO staff reflecting internal deliberations regarding proposed draft press statement regarding the financial condition and capital requirements of the GSEs	Deliberative Process

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Exhibit C

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January 16, 2015

Privilege Log 001 (Treasury)

Log Line ID	Date	From/Author	To/Recipients	Privilege	Description
1	8/19/2012	Sperling, Gene; ExecSec Staff	President; Geithner, Timothy	Presidential Privilege	Email communication to President from Chief Economic Adviser providing selected economic information and analysis.
2	8/18/2012	Bulletin News	President; Senior White House Staff; Geithner, Timothy	Presidential Privilege	White House News Summary prepared for President and senior White House staff on a variety of issues, including changes to the PSPAs.
3	8/18/2012	Bulletin News	President; Senior White House Staff; Geithner, Timothy	Presidential Privilege	White House News Summary prepared for the President and senior White House staff on a variety of issues, including changes to the PSPAs.
4	8/18/2012	Bulletin News	President; Senior White House Staff; Geithner, Timothy	Presidential Privilege	White House News Summary prepared for the President and senior White House staff on a variety of issues, including changes to the PSPAs.
5	8/16/2012	ExecSecProcessUnit	Geithner, Timothy; ExecSec Staff	Deliberative Process; Presidential Privilege	Email to Secretary attaching draft press release containing White House and other edits to proposed, forthcoming announcement of changes to the PSPAs.
6	8/16/2012	ExecSecProcessUnit	Geithner, Timothy; ExecSec Staff	Deliberative Process; Presidential Privilege	Draft press release containing White House and other edits to proposed, forthcoming announcement of changes to the PSPAs.
7	8/14/2012	Zwart, Breanna; ExecSecProcessUnit	Geithner, Timothy; ExecSec Staff	Deliberative Process	Document containing compilation of predecisional briefing materials for use by Secretary to prepare for various meetings with senior Government officials, including FHFA Director DeMarco.
8	8/14/2012	Miller, Mary	Geithner, Timothy; Wolin, Neal; Patterson, Mark; LeCompte, Jenni	Deliberative Process	Email communication from senior Treasury staff to Secretary providing confidential predecisional analysis and information related to several issues, including the proposed amendment to the PSPAs.
9	8/13/2012	Zwart, Breanna; ExecSecProcessUnit	Geithner, Timothy, LeCompte, Jenni; Shah, Bhumi; ExecSec Staff	Deliberative Process	Confidential compilation of briefing materials for the Secretary including internal materials related to Treasury policies on a number of economic and housing issues.
10	7/22/2012	Miller, Mary	Geithner, Timothy; Wolin, Neal	Deliberative Process; Presidential Privilege	E-mail communication among senior Treasury officials and White House personnel related to drafts of key points regarding PSPA modifications.
11	7/3/2012	Bowler, Timothy	Geithner, Timothy; Miller, Mary; Massad, Timothy	Deliberative Process	Email communication among senior Treasury staff containing predecisional information related to the GSEs reducing their portfolios.

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12	6/23/2012	ExecSecProcessUnit	Geithner, Timothy; ExecSecStaff	Deliberative Process	Email communication among senior Treasury staff containing predecisional information relating to pending policy issues, including housing reform and amendments to the PSPAs.
13	6/23/2012	ExecSecProcessUnit; Chepenik, Adam	Geithner, Timothy; ExecSecStaff	Deliberative Process	Communication among senior Treasury staff containing predecisional information relating to pending policy issues, including housing reform and amendments to the PSPAs.
14	6/21/2012	Miller, Mary	Geithner, Timothy; Wolin, Neal; Massad, Timothy; Stegman, Michael; Eberly, Janice; Bowler, Timothy	Deliberative Process	Email communication among senior Treasury staff containing predecisional information relating to negotiations between Treasury and FHFA related to PSPAs.
15	6/1/2012	ExecSecProcessUnit	Geithner, Timothy; ExecSecStaff	Deliberative Process	Email communication to Secretary containing predecisional information and comments from senior staff related potential changes to PSPAs
16	6/1/2012	ExecSecProcessUnit	Geithner, Timothy; ExecSecStaff	Attorney Client; Deliberative Process; Presidential Privilege	Document containing predecisional information and reflecting internal discussion between Secretary and staff regarding proposed changes to the PSPAs.
17	5/14/2012	ExecSecProcessUnit; Miller, Mary; Eberly, Janice; Massad, Timothy; Stegman, Michael	Geithner, Timothy; ExecSecStaff	Deliberative Process	Email attaching predecisional briefing memorandum outlining ongoing policy positions on issues involving FHFA and the PSPAs.
18	5/14/2012	Miller, Mary; Eberly, Janice; Massad, Timothy; Stegman, Michael	Geithner, Timothy	Deliberative Process	Email attaching predecisional briefing memorandum outlining ongoing policy positions on issues involving FHFA and the PSPAs.
19	4/11/2012	LeCompte, Jenni	Geithner, Timothy	Deliberative Process	Memorandum from senior Treasury staff to Secretary regarding predecisional, draft position statement on the Government's responses to the financial crisis.
20	4/7/2012	ExecSecProcessUnit	Geithner, Timothy; ExecSecStaff	Deliberative Process	Email communication to Secretary attaching predecisional, draft presentation regarding TARP program.
21	4/7/2012	ExecSecProcessUnit	Geithner, Timothy; ExecSecStaff	Deliberative Process	Predecisional, draft presentation prepared by senior Treasury staff regarding the TARP program and the financial rescue.
22	3/24/2012	ExecSecProcessUnit; Dash, Eric	Geithner, Timothy; ExecSecStaff	Deliberative Process	Email attaching predecisional, draft policy document prepared for and reviewed by the Secretary addressing various Federal responses to the financial crisis.
23	3/24/2012	ExecSecProcessUnit; Dash, Eric	Geithner, Timothy; ExecSecStaff	Deliberative Process	Predecisional, draft policy document prepared for and reviewed by the Secretary addressing various Federal responses to the financial crisis.
24	3/23/2012	ExecSecProcessUnit	Geithner, Timothy; ExecSecStaff	Deliberative Process	Email communication to Secretary containing and forwarding predecisional, draft article related to the Government's responses to the financial crisis.
25	3/23/2012	ExecSecProcessUnit; Eric Dash	Geithner, Timothy; ExecSecStaff	Deliberative Process	Memorandum to Secretary describing changes to predecisional, draft article on the Government's responses to the financial crisis.

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26	3/23/2012	ExecSecProcessUnit; Eric Dash	Geithner, Timothy; ExecSecStaff	Deliberative Process	Predecisional, draft article prepared for and reviewed by the Secretary related to the Government's responses to the financial crisis.
27	3/16/2012	ExecSecProcessUnit; Eric Dash	Geithner, Timothy; ExecSecStaff	Deliberative Process	Email communication to Secretary containing and forwarding predecisional, draft article related to the Government's responses to the financial crisis.
28	3/16/2012	ExecSecProcessUnit; Eric Dash	Geithner, Timothy; ExecSecStaff	Deliberative Process	Memorandum to Secretary attaching and explaining changes to predecisional, draft article on Government responses to financial crisis.
29	3/16/2012	ExecSecProcessUnit; Eric Dash	Geithner, Timothy; ExecSecStaff	Deliberative Process	Predecisional, draft article prepared for and reviewed by the Secretary related to the Government's responses to financial crisis.
30	3/13/2012	ExecSecProcessUnit; Eric Dash	Geithner, Timothy; ExecSecStaff	Deliberative Process	Email containing and attaching predecisional, draft internal discussion about opinion/editorial for Secretary addressing various aspects of Federal housing policy.
31	3/13/2012	ExecSecProcessUnit; Eric Dash	Geithner, Timothy; ExecSecStaff	Deliberative Process	Predecisional, draft opinion/editorial prepared for Secretary's review addressing various aspects of Federal housing policy.
32	3/12/2012	Sperling, Gene	Geithner, Timothy; Deese, Brian	Deliberative Process; Presidential Privilege	Email communication to Secretary from President's economic advisor attaching predecisional, draft update on the status of the Administration's housing policies and strategies going forward.
33	3/12/2012	Sperling, Gene	Geithner, Timothy; Deese, Brian	Deliberative Process; Presidential Privilege	Predecisional, draft memorandum prepared by the President's Chief Economic Advisor on the status of the Administration's housing policies and strategies going forward.
34	3/12/2012	ExecSecProcessUnit; Cohen, Mark	Geithner, Timothy; ExecSecStaff	Deliberative Process	Email communication to Secretary containing and attaching predecisional, draft article regarding Government responses to the financial crisis.
35	3/12/2012	ExecSecProcessUnit; Cohen, Mark	Geithner, Timothy; ExecSecStaff	Deliberative Process	Predecisional, draft article prepared for and reviewed by the Secretary regarding Government responses to the financial crisis.
36	3/12/2012	ExecSecProcessUnit; Cohen, Mark	Geithner, Timothy; ExecSecStaff	Deliberative Process	Predecisional, draft article prepared for and reviewed by the Secretary regarding Government responses to the financial crisis.
37	3/12/2012	ExecSecProcessUnit; Cohen, Mark	Geithner, Timothy; ExecSecStaff	Deliberative Process	Memorandum from Treasury staff to Secretary providing comments on predecisional, draft article regarding Government responses to the financial crisis.
38	2/28/2012	ExecSecProcessUnit; Mlynarczyk, Beth	Geithner, Timothy; ExecSecStaff	Deliberative Process	Email communication to Secretary containing predecisional comments from Treasury Staff on proposed legislation and Treasury housing policy goals.
39	2/28/2012	ExecSecProcessUnit; Mlynarczyk, Beth	Geithner, Timothy; ExecSecStaff	Deliberative Process	Memorandum from Treasury staff to Secretary containing predecisional, draft commentary on proposed legislation and Treasury housing policy goals.

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40	2/23/2012	ExecSecProcessUnit	Geithner, Timothy; Adeyemo, Adewale; ExecSecStaff	Deliberative Process	Email containing and attaching predecisional, draft questions and answers for the Secretary's use relating to Federal housing policy and the future of the GSEs.
41	2/23/2012	ExecSecProcessUnit	Geithner, Timothy; Adeyemo, Adewale; ExecSecStaff	Deliberative Process	Predecisional, draft memorandum containing questions and answers for the Secretary's use relating to Federal housing policy and the future of the GSEs.
42	2/23/2012	ExecSecProcessUnit; Ma, Stephanie; Hopkins, Marissa	Geithner, Timothy; Adeyemo, Adewale; ExecSecStaff	Deliberative Process	Email communication to Secretary attaching materials (including questions/answers) in preparation for news program.
43	2/23/2012	ExecSecProcessUnit	Geithner, Timothy; Adeyemo, Adewale; ExecSecStaff	Deliberative Process	Memorandum to Secretary from Treasury staff containing predecisional, proposed questions/answers in preparation for news program.
44	2/22/2012	Bulletin News	Geithner, Timothy; President; Senior White House Staff	Presidential Privilege	White House News Summary prepared for President and senior White House staff.
45	2/22/2012	Bulletin News	Geithner, Timothy; President; Senior White House Staff	Presidential Privilege	White House News Summary prepared for the President and senior White House staff.
46	2/10/2012	ExecSecProcessUnit	Geithner, Timothy; ExecSecStaff	Deliberative Process	Email communication to Secretary attaching predecisional, draft Congressional testimony and preparation materials.
47	2/10/2012	ExecSecProcessUnit	Geithner, Timothy; ExecSecStaff	Deliberative Process	Memorandum for Secretary attaching predecisional, draft testimony and preparation materials addressing variety of policy and budget issues.
48	2/10/2012	ExecSecProcessUnit; Posen, Jonathan	Geithner, Timothy; ExecSecStaff	Deliberative Process	Predecisional, draft Congressional testimony prepared by Treasury staff for Secretary's review and comment.
49	2/10/2012	ExecSecProcessUnit	Geithner, Timothy; ExecSecStaff	Deliberative Process	Predecisional, draft Congressional testimony prepared by Treasury Staff and provided to Secretary for review and comment.
50	2/3/2012	Bulletin News	Geithner, Timothy; President; Senior White House Staff	Presidential Privilege	White House News Summary prepared for President and White House senior staff.
51	2/3/2012	Bulletin News	Geithner, Timothy; President; Senior White House Staff	Presidential Privilege	White House News Summary prepared for President and White House senior staff.
52	2/2/2012	ExecSecProcessUnit; Adeyemo, Adewale	Geithner, Timothy; ExecSecStaff	Deliberative Process	Predecisional, draft statement prepared for and reviewed by the Secretary on the state of the Administration's financial reforms and initiatives.
53	1/24/2012	ExecSecProcessUnit; Stegman, Michael	Geithner, Timothy; ExecSecStaff	Deliberative Process	Email communication from senior staff to Secretary containing and attaching predecisional information related to housing policies and potential actions by FHFA, the GSEs and FHA to increase the availability of mortgage credit.
54	1/24/2012	ExecSecProcessUnit; Stegman, Michael	Geithner, Timothy; ExecSecStaff	Deliberative Process	Memorandum for the Secretary containing predecisional information related to housing policies and potential actions by FHFA, the GSEs and FHA to increase the availability of mortgage credit.

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55	1/24/2012	ExecSecProcessUnit; Miller, Mary	Geithner, Timothy; ExecSecStaff	Deliberative Process	Memorandum from senior staff to Secretary containing predecisional information related to housing policies, lending conditions, and potential actions by FHFA, the GSEs and FHA to increase the availability of mortgage credit.
56	1/17/2012	Miller, Mary	Geithner, Timothy; Adeyemo, Adewale; Massad, Timothy; Eberly, Janice	Deliberative Process	E-mail communication between senior Treasury staff and Secretary Geithner regarding draft, predecisional statements of Treasury position on changes to the FHFA conservatorships.
57	1/17/2012	ExecSecProcessUnit; Deese, Brian	Geithner, Timothy; Adeyemo; Adewale	Deliberative Process	E-mail communication between senior Treasury staff and Secretary Geithner regarding draft, predecisional statements of Treasury position on changes to the FHFA conservatorships.
58	1/17/2012	ExecSecProcessUnit; Deese, Brian	Geithner, Timothy; Adeyemo; Adewale	Deliberative Process	Memorandum containing draft, predecisional statements of Treasury's position on potential changes to the FHFA conservatorships.
59	1/17/2012	ExecSecProcessUnit; Deese, Brian	Geithner, Timothy; ExecSecStaff	Deliberative Process	E-mail communication between senior Treasury staff and Secretary Geithner regarding draft, predecisional statements of Treasury position on changes to the FHFA conservatorships.
60	1/17/2012	ExecSecProcessUnit; Deese, Brian	Geithner, Timothy; ExecSecStaff	Deliberative Process	Memorandum prepared by senior Treasury staff for Secretary regarding draft, predecisional statements of Treasury position on changes to the FHFA conservatorships.
61	2/2/2012	Adeyemo, Adewale	Geithner, Timothy; Wolin; Neal; ExecSecStaff	Deliberative Process	Predecisional, draft remarks of Secretary Geithner on the state of financial reform, to be presented to the Financial Stability Oversight Council.
62	1/31/2012	Fikre, Million; Adeyemo, Adewale	Geithner, Timothy; ExecSecStaff	Deliberative Process	Predecisional draft remarks of Secretary Geithner on the state of financial reform, to be presented to the Financial Stability Oversight Council.
63	6/1/2012	Geithner, Timothy	Gathers, Shirley; Adeyemo; Adewale	Deliberative Process	Email communication to senior Treasury staff member from Secretary providing feedback on predecisional, draft memo to White House related to the GSEs and housing policies.
64	3/13/2012	Geithner, Timothy	Wolin, Neal	Deliberative Process; Presidential Privilege	Email communication to senior Treasury staff member from Secretary containing predecisional information and comments related to draft memorandum prepared for President on various housing policies and strategies.
65	3/12/2012	Geithner, Timothy; Sperling, Gene	Wolin, Neal	Deliberative Process	Draft memorandum from Treasury to the White House providing predecisional, draft information and commentary on various housing policies and Treasury's strategy going forward.
66	3/7/2012	Geithner, Timothy	Geithner, Timothy; Adeyemo, Adewale	Deliberative Process	Predecisional, draft editorial prepared for and reviewed by the Secretary related to the Government's responses to the financial crisis.

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67	2/2/2012	Geithner, Timothy	Posen, Jonathan; LeCompte, Jenni; Gerety, Amias; Wolin, Neal; Adeyemo, Adewale	Deliberative Process	Predecisional, draft remarks of the Secretary related to housing policies and the state of financial reform, to be presented to the Financial Stability Oversight Council.
68	2/1/2012	Geithner, Timothy	Posen, Jonathan; LeCompte, Jenni; Gerety, Amias; Wolin, Neal; Adeyemo, Adewale	Deliberative Process	Predecisional, draft remarks of the Secretary related to housing policies and the state of financial reform, to be presented to the Financial Stability Oversight Council.
69	1/28/2012	Geithner, Timothy	Posen, Jonathan; LeCompte, Jenni; Gerety, Amias; Wolin, Neal; Adeyemo, Adewale	Deliberative Process	Email from Secretary to senior Treasury staff containing predecisional, draft remarks related to housing policies and the state of financial reform, to be presented to the Financial Stability Oversight Council.
70	1/17/2012	Geithner, Timothy	Stegman, Michael; Miller, Mary; Massad, Timothy; Eberly, Janice; Adeyemo, Adewale	Deliberative Process; Presidential Privilege	E-mail communication between senior Treasury staff and Secretary containing predecisional, draft statements of the Administration's position on potential changes to the FHFA conservatorships.
71	1/17/2012	Geithner, Timothy	Stegman, Michael; Miller, Mary; Massad, Timothy; Eberly, Janice; Adeyemo, Adewale	Deliberative Process; Presidential Privilege	Memorandum containing predecisional, draft statements of the Administration's position on potential changes to the FHFA conservatorships.
72	1/17/2012	Geithner, Timothy; Deese, Brian	Geithner, Timothy; Adeyemo, Adewale	Deliberative Process; Presidential Privilege	E-mail communication between senior Treasury staff and Secretary containing and attaching predecisional, draft statements of the Administration's position on potential changes to the FHFA conservatorships.
73	1/17/2012	Geithner, Timothy; Deese, Brian	Geithner, Timothy; Adeyemo, Adewale	Deliberative Process; Presidential Privilege	Memorandum containing predecisional, draft statements of the Administration's position on potential changes to the FHFA conservatorships.
74	6/18/2012	Mlynarczyk, Beth	Massad, Timothy; Stegman, Michael; Bowler, Timothy; Bieger, Peter*; Weideman, Christian*; Valverde, Sam; Fitzpayne, Alastair; Meade, Christopher*; Foster, Jeff	Attorney Client; Deliberative Process	Document containing draft, predecisional language for consideration in amendment to the PSPAs, forwarded to Treasury staff for comments and counsel for purpose of legal advice.
75	4/23/2012	Schumer, Jessica; Moody's Investors Service	Bowler, Timothy; Parrott, James; Deese, Brian	Deliberative Process	Predecisional, confidential report prepared for Treasury by consultant Moody's relating to Treasury policy and the GSEs' capital positions.
76	3/9/2012	Chepenik, Adam	Miller, Mary; Hester, Barrett (Bret); Bowler, Timothy; Foster, Jeff; Gregg, Richard; Courtney, Judith; Monroe, David; Madison, George*; Weideman, Christian*; Bieger, Peter*	Attorney Client; Deliberative Process	Predecisional email communication and meeting note from Treasury counsel to Treasury staff providing confidential legal advice relating to Treasury's administration of the PSPAs.
77	3/6/2012	Chepenik, Adam	Foster, Jeff; Bowler, Timothy	Deliberative Process	Document/chart containing predecisional information and commentary related to Treasury policy with respect to the GSEs and housing finance reform.
78	2/17/2012	Chepenik, Adam	Bowler, Timothy; Foster, Jeff; Mlynarczyk, Beth	Attorney Client; Deliberative Process	Confidential presentation prepared by Treasury staff for purpose of obtaining legal advice from attorneys at the Department of Justice.

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79	3/28/2012	Stegman, Michael	Eberly, Janice; Bowler, Timothy; Mlynarczyk, Beth	Deliberative Process	Predecisional, draft housing policy memorandum prepared by Treasury staff relating to affordable housing and housing finance reform.
80	6/20/2012	Chepenik, Adam	Goldblatt, Alan; Bowler, Timothy; Mlynarczyk, Beth; Roberts, Benson; Dworkin, David; Datta, Ankur	Deliberative Process	Document/chart prepared by Treasury staff containing predecisional statements and commentary related to housing policy and housing finance reform.
81	6/22/2012	Chepenik, Adam	Goldblatt, Alan; Bowler, Timothy; Mlynarczyk, Beth; Roberts, Benson; Dworkin, David; Datta, Ankur	Deliberative Process	Document/chart prepared by Treasury staff containing predecisional statements and commentary related to housing policy and housing finance reform.
82	8/16/2012	Chepenik, Adam	Goldblatt, Alan; Bowler, Timothy; Mlynarczyk, Beth; Roberts, Benson; Dworkin, David; Datta, Ankur	Deliberative Process	Document/chart prepared by Treasury staff containing predecisional statements and commentary related to housing policy, the PSPAs, and housing finance reform.
83	9/28/2012	Bowler, Timothy; Goldblatt, Alan	Miller, Mary	Deliberative Process	Memorandum for Undersecretary prepared by Treasury staff containing predecisional information and comments related to upcoming meeting with Freddie Mac management.
84	9/28/2012	Bowler, Timothy; Goldblatt, Alan	Miller, Mary; Stegman, Michael	Deliberative Process	Memorandum for Undersecretary prepared by Treasury staff containing predecisional information and comments related to upcoming meeting with Freddie Mac management.
85	9/28/2012	Bowler, Timothy; Goldblatt, Alan	Miller, Mary; Stegman, Michael	Deliberative Process	Memorandum for Undersecretary prepared by Treasury staff containing predecisional information and comments related to upcoming meeting with Freddie Mac management.
86	9/28/2012	Anderson, Matthew	Chepenik, Adam; Stegman, Michael; Bowler, Timothy; Bieger, Peter*; Moore, Megan; Valverde, Sam; Datta, Ankur; Goldblatt, Alan	Deliberative Process; Attorney Client	Email communication between Treasury staff containing predecisional comments related to Treasury's potential waiver of the periodic commitment fee under the PSPAs, and copied to in-house counsel for purpose of obtaining legal advice.
87	9/28/2012	Goldblatt, Alan; Bowler, Timothy	Bowler, Timothy; Stegman, Michael; Grom, John; Massad, Timothy; Kingsley, Darius	Deliberative Process	Draft memorandum for Undersecretary prepared by Treasury staff containing predecisional information and comments related to upcoming meeting with Freddie Mac management.
88	9/27/2012	Bieger, Peter*	Bowler, Timothy	Attorney Client	Email communications between senior Treasury employee and in-house counsel reflecting confidential request for legal advice and legal advice.
89	9/27/2012	Bieger, Peter*	Bowler, Timothy	Attorney Client	Email communications between senior Treasury employee and in-house counsel reflecting confidential request for legal advice.
90	9/26/2012	Stegman, Michael; Datta, Ankur	Geithner, Timothy; Bowler, Timothy; Mlynarczyk, Beth; Valverde, Sam; Hipple, Elizabeth	Deliberative Process	Briefing memorandum prepared by senior Treasury staff for Secretary Geithner containing predecisional information and comments related to upcoming meeting with FHFA Director Ed DeMarco.

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91	9/25/2012	Stegman, Michael; Hipple, Elizabeth	Datta, Ankur; Stegman, Michael; Bowler, Timothy; Valverde, Sam; Mlynarczyk	Deliberative Process	Briefing memorandum prepared by senior Treasury staff for Secretary Geithner containing predecisional information and comments related to upcoming meeting with FHFA Director Ed DeMarco.
92	9/25/2012	Stegman, Michael; Datta, Ankur	Stegman, Michael; Bowler, Timothy; Valverde, Sam; Hipple, Elizabeth; Mlynarczyk, Beth	Deliberative Process	Briefing memorandum prepared by senior Treasury staff for Secretary Geithner containing predecisional information and comments related to upcoming meeting with FHFA Director Ed DeMarco.
93	9/25/2012	Goldblatt, Alan	Bowler, Timothy; Stegman, Michael; Bieger, Peter*; Chepenik, Adam; Mlynarczyk, Beth	Attorney Client; Deliberative Process	Email communication among senior Treasury staff and in-house counsel containing predecisional comments and response to confidential request for legal advice related to Treasury policy on GSE Risk Management Plans.
94	9/25/2012	Goldblatt, Alan	Bowler, Timothy; Stegman, Michael; Bieger, Peter*; Chepenik, Adam; Mlynarczyk, Beth	Attorney Client; Deliberative Process	Draft, predecisional letter to FHFA, with comments/advice from in-house counsel, relating to GSE risk management plans.
95	9/25/2012	Goldblatt, Alan	Bowler, Timothy	Deliberative Process	Draft, predecisional policy memorandum circulated among senior Treasury staff relating to GSE risk management plans.
96	9/24/2012	Goldblatt, Alan	Wrennall-Montes, Sarah; Lee, Sandra; Woolf, Andrew; Bowler, Timothy; Stegman, Michael; Mlynarczyk, Beth	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
97	9/24/2012	Goldblatt, Alan	Bieger, Peter*; Wilson, Maya; Stegman, Michael; Bowler, Timothy; Mlynarczyk, Beth; Roberts, Benson; Lee, Sandra	Attorney Client; Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans, and copied to in-house counsel for purpose of obtaining legal advice.
98	9/24/2012	Goldblatt, Alan	Stegman, Michael; Bowler, Timothy; Roberts, Benson	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
99	9/24/2012	Goldblatt, Alan	Stegman, Michael; Bowler, Timothy; Roberts, Benson	Deliberative Process	Redlined draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
100	9/23/2012	Roberts, Benson	Stegman, Michael; Goldblatt, Alan; Bowler, Timothy; Mlynarczyk, Beth; Chepenik, Adam; Carey, Matthew; Samuels, Ian; Datta, Ankur; Rollins, Monique; Dworkin, David	Deliberative Process	Email communications among Treasury staff related to draft, predecisional risk management guidance letter from Treasury to FHFA.
101	9/23/2012	Roberts, Benson	Stegman, Michael; Goldblatt, Alan; Bowler, Timothy; Mlynarczyk, Beth; Chepenik, Adam; Carey, Matthew; Samuels, Ian; Datta, Ankur; Rollins, Monique; Dworkin, David	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
102	9/21/2012	Goldblatt, Alan	Bowler, Timothy	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.

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103	9/21/2012	Stegman, Michael; Goldblatt, Alan	Goldblatt, Alan; Bower, Timothy; Mlynarczyk, Beth; Chepenik, Adam; Carey, Matthew; Samuels, Ian; Roberts, Benson; Datta, Ankur; Rollins, Monique; Dworkin, David; Stegman, Michael	Deliberative Process	Email communications among Treasury staff reflecting edits to draft, predecisional letter relating to GSEs' Annual Risk Management Plans.
104	9/21/2012	Stegman, Michael; Goldblatt, Alan	Goldblatt, Alan; Bower, Timothy; Mlynarczyk, Beth; Chepenik, Adam; Carey, Matthew; Samuels, Ian; Roberts, Benson; Datta, Ankur; Rollins, Monique; Dworkin, David; Stegman, Michael	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
105	9/21/2012	Goldblatt, Alan	Stegman, Michael; Bower, Timothy; Mlynarczyk, Beth; Chepenik, Adam; Carey, Matthew; Samuels, Ian; Roberts, Benson; Datta, Ankur; Rollins, Monique; Dworkin, David	Deliberative Process	Email communications containing predecisional comments related to draft letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
106	9/21/2012	Goldblatt, Alan	Stegman, Michael; Bower, Timothy; Mlynarczyk, Beth; Chepenik, Adam; Carey, Matthew; Samuels, Ian; Roberts, Benson; Datta, Ankur; Rollins, Monique; Dworkin, David	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
107	9/21/2012	Goldblatt, Alan	Stegman, Michael; Bower, Timothy; Mlynarczyk, Beth; Chepenik, Adam; Carey, Matthew; Samuels, Ian; Roberts, Benson; Datta, Ankur; Rollins, Monique; Dworkin, David	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
108	9/20/2012	Goldblatt, Alan	Stegman, Michael; Bower, Timothy; Mlynarczyk, Beth; Chepenik, Adam; Carey, Matthew; Samuels, Ian; Roberts, Benson; Datta, Ankur; Rollins, Monique; Dworkin, David	Deliberative Process	Email communication among Treasury staff related to draft, predecisional letter to FHFA related to the GSEs' Annual Risk Management Plans.
109	9/20/2012	Goldblatt, Alan	Stegman, Michael; Bower, Timothy; Mlynarczyk, Beth; Chepenik, Adam; Carey, Matthew; Samuels, Ian; Roberts, Benson; Datta, Ankur; Rollins, Monique; Dworkin, David	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
110	9/20/2012	Goldblatt, Alan	Stegman, Michael; Bower, Timothy; Mlynarczyk, Beth; Chepenik, Adam; Carey, Matthew; Samuels, Ian; Roberts, Benson; Datta, Ankur; Rollins, Monique; Dworkin, David	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
111	9/20/2012	Goldblatt, Alan	Bowler, Timothy	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.

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112	9/18/2012	Chepenik, Adam	Stegman, Michael; Bowler, Timothy; Mlynarczyk, Beth; Goldblatt, Alan; Carey, Matthew; Samuels, Ian; Roberts, Benson; Datta, Ankur; Rollins, Monique; Dworkin, David	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
113	9/16/2012	Goldblatt, Alan	Bowler, Timothy; Chepenik, Adam; Rollins, Monique	Deliberative Process	Email communication among Treasury staff containing predecisional information related to the methodology for valuing Treasury's senior preferred stock in the GSEs.
114	9/16/2012	Mlynarczyk, Beth	Goldblatt, Alan; Stegman, Michael; Bowler, Timothy; Samuels, Ian; Chepenik, Adam	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
115	9/15/2012	Goldblatt, Alan	Stegman, Michael; Bowler, Timothy; Mlynarczyk, Beth; Chepenik, Adam; Samuels, Ian	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
116	9/15/2012	Goldblatt, Alan	Bowler, Timothy; Samuels, Ian	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
117	9/14/2012	Goldblatt, Alan	Bowler, Timothy; Samuels, Ian	Deliberative Process	Draft, predecisional letter prepared by senior Treasury staff to FHFA Director Ed DeMarco related to the GSEs' Annual Risk Management Plans.
118	9/13/2012	Chepenik, Adam	Bowler, Timothy; Mlynarczyk, Beth; Datta, Ankur	Deliberative Process	Draft, predecisional document containing proposed answers to interview questions related to Treasury policy as to the GSEs and housing reform.
119	9/4/2012	Chepenik, Adam	Gelber, Alexander; Bowler, Timothy	Deliberative Process	Draft, predecisional policy memorandum prepared for senior Treasury staff related to FHFA's REO-to-rental initiative.
120	8/31/2012	Chepenik, Adam	Stegman, Michael; Bowler, Timothy; Goldblatt, Alan; Valverde, Sam; Mlynarczyk, Beth	Deliberative Process	Draft, predecisional budget policy document related to programs created to provide stability to the financial markets and promote mortgage affordability.
121	8/30/2012	Chepenik, Adam	Stegman, Michael; Hidalgo, Bibi; Bowler, Timothy; Anderson, Matthew; Mlynarczyk, Beth; Dworkin, David; Dash, Eric; Coley, Anthony	Deliberative Process	Email communications among Treasury staff containing predecisional, policy information related to FHFA's REO to rental program.
122	8/30/2012	Chepenik, Adam	Stegman, Michael; Hidalgo, Bibi; Bowler, Timothy; Anderson, Matthew; Mlynarczyk, Beth; Dworkin, David; Dash, Eric; Coley, Anthony	Deliberative Process	Attachment to email communications among Treasury staff containing predecisional, policy information related to FHFA's REO to rental program.

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123	8/27/2012	Chepenik, Adam	Goldblatt, Alan; Bowler, Timothy; Datta, Ankur	Deliberative Process	Confidential, predecisional memorandum among senior Treasury staff providing information related to market reaction to changes to the PSPAs.
124	8/27/2012	Chepenik, Adam	Stegman, Michael; Bowler, Timothy; Goldblatt, Alan; Datta, Ankur; Mlynarczyk, Beth	Deliberative Process	Draft, predecisional budget policy document circulated among Treasury staff related to Treasury programs to provide stability to financial markets and promote mortgage affordability.
125	8/24/2012	Chepenik, Adam	Lee, Sandra; Franco, Jamie; Rosen, Kathryn; Datta, Ankur; Gerety, Amias; Hester, Barrett; Portilla, David; Stegman, Michael; Woolf, Andrew; Cabot, Chloe; Wrennall-Montes, Sarah; Kingsley, Darius; Chang, Karen; Bowler, Timothy	Deliberative Process	Draft senior Treasury staff memorandum containing predecisional policy discussion on various housing initiatives.
126	8/20/2012	Stegman, Michael	Miller, Mary; LeCompte, Jenni; Bowler, Timothy; Adeyemo, Adewale; Anderson, Matthew; Gibson, Campbell	Deliberative Process	Email communications among senior Treasury officials discussing pre-decisional policy information related to PSPAs.
127	8/20/2012	Miller, Mary	LeCompte, Jenni; Stegman, Michael; Bowler, Timothy; Adeyemo, Adewale; Anderson, Matthew; Gibson, Campbell	Deliberative Process	Email communications among senior Treasury officials discussing pre-decisional policy information related to PSPAs.
128	8/20/2012	Wrennall-Montes, Sally	Joshua; Florman, Carole; Reger, Mark; Carrington, Wanda; Gerety, Amias; Rourke, Daniel; Tepperman, Jason; Quittman, Louisa; Roberts, Benson; Graves, Donet; Rosen, Kathryn; Grom, John; Auer, Lance; Courtney, Judith; Polan, Theodore; Bowler, Timothy; Kash, Elaine; Koide, Melissa; Graves, Leslie; Stout, Jeffrey; Hester, Barrett; Franco, Jamie; Roberts, David; Lee, Sandra; Woolf, Andrew; Cabot, Chloe	Deliberative Process	Internal memorandum prepared for the Secretary containing predecisional information related to possible amendments to the PSPAs.
129	8/18/2012	Anderson, Matthew	Miller, Mary; Stegman, Michael; Bowler, Timothy; LeCompte, Jenni; Adeyemo, Adewale	Deliberative Process	Email communications among Treasury staff containing draft, predecisional policy information related to PSPA amendments.
130	8/18/2012	Anderson, Matthew	Miller, Mary; Stegman, Michael; Bowler, Timothy; LeCompte, Jenni; Adeyemo, Adewale	Deliberative Process	Attachment to email communications among Treasury staff containing draft, predecisional policy information related to PSPA amendments.
131	8/18/2012	Miller, Mary	Stegman, Michael; Bowler, Timothy; LeCompte, Jenni; Adeyemo, Adewale; Anderson, Matthew	Deliberative Process	Email communication among Treasury staff containing draft, predecisional policy information related to PSPA amendments.
132	8/18/2012	Miller, Mary	Stegman, Michael; Bowler, Timothy; LeCompte, Jenni; Adeyemo, Adewale; Anderson, Matthew	Deliberative Process	Attachment to email communication among Treasury staff containing draft, predecisional policy information related to PSPA amendments.

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133	8/18/2012	Stegman, Michael	Anderson, Matthew; Miller, Mary; Bowler, Timothy; Adeyemo, Adewale; LeCompte, Jenni	Deliberative Process	Email communications among Treasury staff containing draft, predecisional policy information related to PSPA amendments.
134	8/18/2012	Anderson, Matthew	Miller, Mary; Stegman, Michael; Bowler, Timothy; Adeyemo, Adewale; LeCompte, Jenni	Deliberative Process	Email communications among Treasury staff containing draft, predecisional policy information related to PSPA amendments.
135	8/18/2012	Anderson, Matthew	Miller, Mary; Stegman, Michael; Bowler, Timothy; Adeyemo, Adewale; LeCompte, Jenni	Deliberative Process	Email communications among Treasury staff containing draft, predecisional policy information related to PSPA amendments.
136	8/18/2012	Anderson, Matthew	Miller, Mary; Stegman, Michael; Bowler, Timothy; Adeyemo, Adewale; LeCompte, Jenni	Deliberative Process	Attachment to email communications among Treasury staff containing draft, predecisional policy information related to PSPA amendments.
137	8/18/2012	Miller, Mary	Stegman, Michael; Bowler, Timothy; Adeyemo, Adewale; LeCompte, Jenni; Anderson, Matthew	Deliberative Process	Email communication among Treasury staff containing draft, predecisional policy information related to PSPA amendments.
138	8/18/2012	Miller, Mary	Stegman, Michael; Bowler, Timothy; Adeyemo, Adewale; LeCompte, Jenni; Anderson, Matthew	Deliberative Process	Attachment to email communication among Treasury staff containing draft, predecisional policy information related to PSPA amendments.
139	8/18/2012	LeCompte, Jenni	Miller, Mary; Bowler, Timothy; Stegman, Michael; Adeyemo, Adewale; Anderson, Matthew	Deliberative Process	Email communications among Treasury staff containing draft, predecisional policy information related to PSPA amendments.
140	8/18/2012	LeCompte, Jenni	Miller, Mary; Bowler, Timothy; Stegman, Michael; Adeyemo, Adewale; Anderson, Matthew	Deliberative Process	Attachment to email communications among Treasury staff containing draft, predecisional policy information related to PSPA amendments.
141	8/18/2012	Miller, Mary	Stegman, Michael; Bowler, Timothy; Adeyemo, Adewale; LeCompte, Jenni	Deliberative Process	Email communication among Treasury staff containing draft, predecisional policy information related to PSPA amendments.
142	8/18/2012	Miller, Mary	Stegman, Michael; Bowler, Timothy; Adeyemo, Adewale; LeCompte, Jenni	Deliberative Process	Attachment to email communication among Treasury staff containing draft, predecisional policy information related to PSPA amendments.
143	8/18/2012	Chepenik, Adam	Bowler, Timothy; Bieger, Peter*; Datta, Ankur	Attorney Client	Confidential Treasury presentation prepared for purposes of obtaining legal advice from the Department of Justice related to proposed changes to the PSPAs.
144	8/18/2012	Chepenik, Adam	Bowler, Timothy; Bieger, Peter*; Datta, Ankur	Attorney Client	Confidential Treasury presentation prepared for purposes of obtaining legal advice from the Department of Justice related to proposed changes to the PSPAs.

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145	8/18/2012	Parrott, Jim	Bowler, Timothy	Deliberative Process; Presidential Privilege	Email communications between Treasury and White House staff containing predecisional information related to the terms of the PSPAs.
146	8/16/2012	Datta, Ankur	Bowler, Timothy; Valverde, Sam; Chepenik, Adam; Stegman, Michael; Lee, Sandra; Hipple, Elizabeth; Foster, Jeff	Deliberative Process	Document prepared by Treasury staff containing draft, predecisional information related to various housing initiatives and reforms.
147	8/14/2012	Bieger, Peter*	Bowler, Timothy	Attorney Client; Deliberative Process	Confidential email communication from in-house counsel to senior Treasury staff attaching draft amendments to PSPAs and containing legal advice.
148	8/14/2012	Bieger, Peter*	Bowler, Timothy	Attorney Client; Deliberative Process	Attachment to confidential email communication from in-house counsel to senior Treasury staff relating to draft amendments to PSPAs and containing legal advice.
149	8/14/2012	Bieger, Peter*	Bowler, Timothy	Attorney Client; Deliberative Process	Attachment to confidential email communication from in-house counsel to senior Treasury staff relating to draft amendments to PSPAs and containing legal advice.
150	8/14/2012	Bieger, Peter*	Bowler, Timothy	Attorney Client; Deliberative Process	Attachment to confidential email communication from in-house counsel to senior Treasury staff relating to draft amendments to PSPAs and containing legal advice.
151	8/14/2012	Bieger, Peter*	Bowler, Timothy	Attorney Client; Deliberative Process	Attachment to confidential email communication from in-house counsel to senior Treasury staff relating to draft amendments to PSPAs and containing legal advice.
152	8/14/2012	Mlynarczyk, Beth; Stegman, Michael	Slomiany, Hanna; Mandelker, Lauren; Miller, Sarah; Stegman, Michael; Bowler, Timothy; Lee, Sandra	Deliberative Process	Predecisional, draft action memorandum prepared by senior Treasury staff for Secretary related to the Third Amendment to the PSPAs.
153	8/14/2012	Mlynarczyk, Beth; Stegman, Michael	Slomiany, Hanna; Mandelker, Lauren; Miller, Sarah; Stegman, Michael; Bowler, Timothy; Lee, Sandra	Deliberative Process	Predecisional, draft of Third Amendment to the PSPAs, attached as enclosure to draft action memorandum prepared by senior Treasury staff for Secretary.
154	8/14/2012	Chepenik, Adam	Goldblatt, Alan; Datta, Ankur; Mlynarczyk, Beth; Stegman, Michael; Anderson, Matthew; Moore, Megan; Colbert, Julian; Bowler, Timothy; Foster, Jeff; Dash, Eric; Roberts, Benson; Graves, Donet	Deliberative Process	Predecisional, draft questions and answers related to amendments to the PSPAs, prepared for review and comment by senior Treasury staff.
155	8/13/2012	Mlynarczyk, Beth	Bowler, Timothy	Deliberative Process	Draft policy memorandum prepared by senior Treasury staff for Secretary containing predecisional information regarding proposed changes to the PSPAs.
156	8/13/2012	Mlynarczyk, Beth	Bowler, Timothy	Deliberative Process	Draft, redlined policy memorandum prepared by senior Treasury staff for Secretary containing predecisional information regarding proposed changes to the PSPAs.
157	8/13/2012	Parrott, Jim	Bowler, Timothy	Deliberative Process; Presidential Privilege	Email communication between Treasury and White House staff containing draft, predecisional policy statements on Third Amendment.

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158	8/13/2012	Parrott, Jim	Bowler, Timothy	Deliberative Process; Presidential Privilege	Attachment to email communication between Treasury and White House staff containing draft, predecisional policy statements on Third Amendment.
159	8/11/2012	Bieger, Peter*	Bowler, Timothy	Attorney Client; Deliberative Process	Email communications between Treasury staff member and in-house counsel containing confidential, predecisional legal advice and confidential requests for legal advice related to terms of Third Amendment to the PSPAs.
160	8/10/2012	Stegman, Michael	Mlynarczyk, Beth; Anderson, Matthew; Bowler, Timothy; Datta, Ankur; Stegman, Michael	Deliberative Process	Draft, predecisional press release prepared by Treasury staff related to Third Amendment to the PSPAs.
161	8/9/2012	Miller, Mary	Bowler, Timothy	Deliberative Process	Email communications between Treasury staff containing predecisional policy information related to draft of Third Amendment to the PSPAs.
162	8/8/2012	Bieger, Peter*	Bowler, Timothy	Attorney Client; Deliberative Process	Email communication from in-house counsel to Treasury staff member containing confidential, predecisional legal advice related to the terms of the Third Amendments to the PSPAs.
163	8/7/2012	Stegman, Michael	Anderson, Matthew; LeCompte, Jenni; Bowler, Timothy; Coley, Anthony	Deliberative Process	Email communications among Treasury staff containing draft, predecisional information and comments relating to the terms of the Third Amendment to the PSPAs and a draft Treasury press release.
164	8/7/2012	Anderson, Matthew	LeCompte, Jenni; Stegman, Michael; Bowler, Timothy; Coley, Anthony	Deliberative Process	Email communications among Treasury staff containing draft, predecisional information and comments relating to the terms of the Third Amendment to the PSPAs and a draft Treasury press release.
165	8/7/2012	Anderson, Matthew	LeCompte, Jenni; Stegman, Michael; Bowler, Timothy; Coley, Anthony	Deliberative Process	Attachment to email communications among Treasury staff containing draft, predecisional information relating to the terms of the Third Amendment to the PSPAs.
166	8/7/2012	Chepenik, Adam	Bowler, Timothy	Deliberative Process	Draft, predecisional briefing memorandum prepared by Treasury staff for the Under Secretary related to meeting with Fannie Mae and Freddie Mac management.
167	8/7/2012	Datta, Ankur	Bowler, Timothy	Deliberative Process	Presentation prepared by Treasury staff containing predecisional analysis and information related to financial forecasts for Fannie Mae.

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168	8/7/2012	Goldblatt, Alan	Bowler, Timothy; Datta, Ankur; Chepenik, Adam	Deliberative Process	Confidential, predecisional internal forecast of GSE profitability and PSPA capacity over time, prepared by Treasury staff for purposes of proposed changes to the PSPAs.
169	8/7/2012	Bieger, Peter*	Bowler, Timothy	Attorney Client; Deliberative Process	Email communications between Treasury staff and in-house counsel containing confidential, predecisional request for legal advice, and legal advice.
170	8/2/2012	Mlynarczyk, Beth	Bowler, Timothy	Deliberative Process	Internal, predecisional policy memorandum prepared by senior Treasury staff for the Secretary relating to proposed changes to the PSPAs.
171	7/31/2012	Mlynarczyk, Beth	Bowler, Timothy; Stegman, Michael	Deliberative Process	Draft, predecisional paper prepared and circulated among senior Treasury staff related to various aspects of Government housing reform policy.
172	8/1/2012	Deese, Brian C.	Bowler, Timothy	Deliberative Process; Presidential Privilege	Email communications among Treasury staff containing predecisional information and analysis, including discussion with White House staff, related to future GSE draws.
173	7/31/2012	Foster, Jeff	Bowler, Timothy; Stegman, Michael; Mlynarczyk, Beth; Chepenik, Adam; Goldblatt, Alan	Deliberative Process	Email communications among Treasury staff containing predecisional information and analysis related to GSE quarterly financial results.
174	7/30/2012	Samuels, Ian	Hester, Barrett; Bowler, Timothy; Bieger, Peter*; Farrell, Paula; Weber, Karen; McLoughlin, Colleen; Ward, Kara; Franco, Jamie; Carey, Matthew; Goldblatt, Alan; Liebschutz, Jacob; Webb, Benjamin	Deliberative Process; Attorney Client	Draft, predecisional report prepared by Treasury staff related to potential financial exposure resulting from various Government investments, including the GSEs, and copied to in-house counsel for purpose of obtaining legal advice.
175	7/30/2012	Samuels, Ian	Hester, Barrett; Bowler, Timothy; Bieger, Peter*; Farrell, Paula; Weber, Karen; McLoughlin, Colleen; Ward, Kara*; Franco, Jamie; Carey, Matthew; Goldblatt, Alan; Liebschutz, Jacob; Webb, Benjamin	Deliberative Process; Attorney Client	Draft, predecisional document prepared by Treasury staff related to potential financial exposure resulting from various Government investments, including the GSEs, and copied to in-house counsel for purpose of obtaining legal advice.
176	7/30/2012	Foster, Jeff	Bowler, Timothy	Deliberative Process	Draft, predecisional senior Treasury staff document related to Treasury policy and planning regarding proposed changes to the PSPAs.
177	7/27/2012	Eberly, Janice	Massad, Timothy; Stegman, Michael; Miller, Mary; Bowler, Timothy; LeCompte, Jenni; Adeyemo, Adewale; Fitzpayne, Alastair; Woolf, Andrew	Deliberative Process	Email communications among senior Treasury officials containing predecisional information related to draft letter regarding housing policy matters, including HARP and REO.

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178	7/27/2012	Stegman, Michael	Miller, Mary; Massad, Timothy; Eberly, Janice; Bowler, Timothy; LeCompte, Jenni; Adeyemo, Adewale; Fitzpayne, Alastair; Woolf, Andrew	Deliberative Process	Email communications among senior Treasury officials containing predecisional information related to draft letter regarding housing policy matters, including HARP and REO.
179	7/27/2012	Adeyemo, Adewale	Miller, Mary; Stegman, Michael; Massad, Timothy; Eberly, Janice; Bowler, Timothy; LeCompte, Jenni; Fitzpayne, Alastair; Woolf, Andrew; Patterson, Mark; Mandelker, Lauren	Deliberative Process	Email communications among senior Treasury officials containing predecisional information related to draft letter regarding housing policy matters, including HARP and REO.
180	7/27/2012	Miller, Mary	Stegman, Michael; Massad, Timothy; Eberly, Janice; Bowler, Timothy; LeCompte, Jenni; Adeyemo, Adewale; Fitzpayne, Alastair; Woolf, Andrew	Deliberative Process	Email communications among senior Treasury officials containing predecisional information related to draft letter regarding housing policy matters, including HARP and REO.
181	7/26/2012	Miller, Mary	Bowler, Timothy	Deliberative Process; Presidential Privilege	E-mail communications among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
182	7/26/2012	Stegman, Michael	Bowler, Timothy; Mlynarczyk, Beth	Deliberative Process	Draft policy document containing predecisional information and analysis related to potential housing reforms.
183	7/23/2012	Mlynarczyk, Beth	Valverde, Sam; Woolf, Andrew; Stegman, Michael; Bowler, Timothy	Deliberative Process	Email communications among Treasury staff containing predecisional policy information related to upcoming meeting between the Secretary and the FHFA director.
184	7/23/2012	Mlynarczyk, Beth	Valverde, Sam; Woolf, Andrew; Stegman, Michael; Bowler, Timothy	Deliberative Process	Attachment to email communication among Treasury staff containing predecisional policy information related to upcoming meeting between the Secretary and the FHFA director.
185	7/22/2012	Miller, Mary	Adeyemo, Adewale; Valverde, Sam; Massad, Timothy; Stegman, Michael; Bowler, Timothy; Woolf, Andrew; Wolin, Neal; Patterson, Mark	Deliberative Process; Presidential Privilege	E-mail communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
186	7/22/2012	Adeyemo, Adewale	Miller, Mary; Valverde, Sam; Massad, Timothy; Stegman, Michael; Bowler, Timothy; Woolf, Andrew; Wolin, Neal; Patterson, Mark	Deliberative Process; Presidential Privilege	E-mail communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
187	7/22/2012	Miller, Mary	Valverde, Sam; Adeyemo, Adewale; Massad, Timothy; Stegman, Michael; Bowler, Timothy; Woolf, Andrew	Deliberative Process; Presidential Privilege	E-mail communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.

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188	7/22/2012	Deese, Brian C.	Miller, Mary; Valverde, Sam; Adeyemo, Adewale; Massad, Timothy; Stegman, Michael; Bowler, Timothy; Woolf, Andrew	Deliberative Process; Presidential Privilege	E-mail communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
189	7/22/2012	Stegman, Michael	Miller, Mary; Massad, Timothy; Bowler, Timothy; Woolf, Andrew	Deliberative Process; Presidential Privilege	E-mail communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
190	7/22/2012	Miller, Mary	Stegman, Michael; Massad, Timothy, Bowler, Timothy; Woolf, Andrew	Deliberative Process; Presidential Privilege	E-mail communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
191	7/22/2012	Massad, Timothy	Stegman, Michael; Miller, Mary; Bowler, Timothy; Woolf, Andrew	Deliberative Process; Presidential Privilege	E-mail communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
192	7/22/2012	Stegman, Michael	Miller, Mary; Massad, Timothy; Bowler, Timothy; Woolf, Andrew	Deliberative Process; Presidential Privilege	E-mail communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
193	7/22/2012	Miller, Mary	Stegman, Michael; Massad, Timothy; Bowler, Timothy; Woolf, Andrew	Deliberative Process; Presidential Privilege	E-mail communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
194	7/22/2012	Miller, Mary	Stegman, Michael; Massad, Timothy; Bowler, Timothy; Woolf, Andrew	Deliberative Process; Presidential Privilege	Attachment to e-mail communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
195	7/20/2012	Stegman, Michael	Miller, Mary; Valverde, Sam; Adeyemo, Adewale; Massad, Timothy; Bowler, Timothy; Deese, Brian; Woolf, Andrew	Deliberative Process; Presidential Privilege	E-mail communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
196	7/20/2012	Miller, Mary	Valverde, Sam; Adeyemo, Adewale; Massad, Timothy; Stegman, Michael; Bowler, Timothy; Deese, Brian; Woolf, Andrew	Deliberative Process; Presidential Privilege	E-mail communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.

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197	7/20/2012	Miller, Mary	Valverde, Sam; Adeyemo, Adewale; Massad, Timothy; Stegman, Michael; Bowler, Timothy; Deese, Brian; Woolf, Andrew	Deliberative Process; Presidential Privilege	Attachment to email communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
198	7/20/2012	Stegman, Michael	Bowler, Timothy	Deliberative Process	Email communications among Treasury staff containing predecisional information and analysis related to proposed changes to the PSPAs.
199	7/20/2012	Stegman, Michael	Woolf, Andrew; Miller, Mary; Bowler, Timothy; Massad, Timothy	Deliberative Process; Presidential Privilege	E-mail communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
200	7/20/2012	Woolf, Andrew	Miller, Mary; Stegman, Michael; Bowler, Timothy; Massad, Timothy	Deliberative Process	Attachment to email communication among senior Treasury officials and White House personnel attaching and commenting on drafts of key points regarding proposed PSPA modifications.
201	7/20/2012	Woolf, Andrew	Stegman, Michael; Bowler, Timothy	Deliberative Process	Email communications among Treasury staff containing predecisional information and analysis related to proposed changes to the PSPAs.
202	7/20/2012	Woolf, Andrew	Stegman, Michael; Bowler, Timothy; Massad, Timothy; Miller, Mary	Deliberative Process	Draft, predecisional policy memorandum prepared by senior Treasury staff related to proposed changes to the PSPAs.
203	7/20/2012	Sachs, Lee	Bowler, Timothy	Deliberative Process	Email communications among Treasury staff containing predecisional information and analysis related to GSE financial projections.
204	7/20/2012	Miller, Mary	Bowler, Timothy; Stegman, Michael	Deliberative Process	Email communications among Treasury staff containing predecisional information and analysis related to proposed changes to the PSPAs.
205	7/20/2012	Miller, Mary	Bowler, Timothy; Stegman, Michael	Deliberative Process	Draft, predecisional policy memorandum prepared by senior Treasury staff related to proposed changes to the PSPAs.
206	7/20/2012	Miller, Mary	Bowler, Timothy; Stegman, Michael	Deliberative Process	Email communication among senior Treasury officials attaching and commenting on draft of key points regarding proposed PSPA modifications.
207	7/19/2012	Wrennall-Montes, Sally	Bowler, Timothy	Deliberative Process	Internal memorandum prepared for senior Treasury staff containing predecisional agency policy positions in anticipation of upcoming meeting with Freddie Mac CEO.

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208	7/19/2012	Chepenik, Adam	Wrennall-Montes, Sally; Chisolm, Shirley; Woolf, Andrew; Stegman, Michael; Bowler, Timothy; Foster, Jeff; Goldblatt, Alan; Datta, Ankur	Deliberative Process	Draft internal memorandum prepared for senior Treasury staff containing predecisional agency policy positions in anticipation of upcoming meeting with Freddie Mac CEO.
209	7/19/2012	Chepenik, Adam	Goldblatt, Alan; Bowler, Timothy; Foster, Jeff; Datta, Ankur	Deliberative Process	Draft internal memorandum prepared for senior Treasury staff containing predecisional agency policy positions in anticipation of upcoming meeting with Freddie Mac CEO.
210	7/19/2012	Goldblatt, Alan	Bowler, Timothy; Foster, Jeff; Chepenik, Adam; Datta, Ankur	Deliberative Process	Draft internal memorandum prepared for senior Treasury staff containing predecisional agency policy positions in anticipation of upcoming meeting with Freddie Mac CEO.
211	7/19/2012	Stegman, Michael	Bowler, Timothy	Deliberative Process	Email communication among Treasury staff containing draft, predecisional policy information and analysis related to relationship between Treasury and FHFA.
212	7/18/2012	Chepenik, Adam	Bowler, Timothy; Foster, Jeff; Datta, Ankur	Deliberative Process	Draft internal memorandum prepared for senior Treasury staff containing predecisional agency policy positions in anticipation of upcoming meeting with Freddie Mac CEO.
213	7/18/2012	Chepenik, Adam	Bowler, Timothy; Foster, Jeff; Datta, Ankur	Deliberative Process	Draft internal memorandum prepared for senior Treasury staff containing predecisional agency policy positions in anticipation of upcoming meeting with Freddie Mac CEO.
214	7/17/2012	Chepenik, Adam	Bowler, Timothy; Foster, Jeff	Deliberative Process	Draft internal memorandum prepared for senior Treasury staff containing predecisional agency policy positions in anticipation of upcoming meeting with Freddie Mac CEO.
215	7/16/2012	Chepenik, Adam	Stegman, Michael; Bowler, Timothy; Foster, Jeff; Goldblatt, Alan; Mlynarczyk, Beth	Deliberative Process	Draft internal memorandum prepared for senior Treasury staff containing predecisional agency policy positions in anticipation of upcoming meeting with Freddie Mac CEO.
216	7/16/2012	Chepenik, Adam	Goldblatt, Alan; Foster, Jeff; Bowler, Timothy; Mlynarczyk, Beth	Deliberative Process	Email communications among Treasury containing predecisional information related to a draft briefing memorandum and proposed policy matters for an upcoming meeting with Freddie Mac.

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217	7/16/2012	Chepenik, Adam	Goldblatt, Alan; Foster, Jeff; Bowler, Timothy; Mlynarczyk, Beth	Deliberative Process	Internal, predecisional briefing memorandum prepared by Treasury staff for the Under Secretary related to an upcoming meeting with Freddie Mac.
218	7/13/2012	Miller, Mary	Stegman, Michael; Bowler, Timothy	Deliberative Process	Email communications among Treasury staff containing predecisional information and analysis related to the PSPAs and principal reduction.
219	7/13/2012	Miller, Mary	Bowler, Timothy	Deliberative Process	Email communications among Treasury staff containing predecisional information and analysis related to the PSPAs and principal reduction.
220	7/13/2012	Fitzpayne, Alastair	Foster, Jeff; Moore, Megan; Bowler, Timothy	Deliberative Process	Email communications among Treasury staff containing predecisional information and analysis related to the PSPAs and principal reduction.
221	7/13/2012	Stegman, Michael	Bowler, Timothy; Miller, Mary	Deliberative Process	Email communications among Treasury staff containing predecisional information and analysis related to the PSPAs and principal reduction.
222	7/13/2012	Fitzpayne, Alastair	Moore, Megan; Bowler, Timothy; Foster, Jeff; Mlynarczyk, Beth; Valverde, Sam; Stegman, Michael; Bowler, Timothy; Roberts, Benson; Chepenik, Adam; Foster, Jeff; Goldblatt, Alan; Woolf, Andrew; Franco, Jamie; Kingsley, Darius; Gelber, Alexander; Abraham, Lisa; Eagan, Kristin; Hipple, Mlynarczyk, Beth; Valverde, Sam; Stegman, Michael; Bowler, Timothy; Roberts, Benson; Chepenik, Adam; Foster, Jeff; Goldblatt, Alan; Woolf, Andrew; Franco, Jamie; Kingsley, Darius; Gelber, Alexander; Abraham, Lisa; Eagan, Kristin; Hipple,	Deliberative Process	Email communications among Treasury staff containing predecisional information and analysis related to the PSPAs and principal reduction.
223	7/9/2012	Grom, John	Mlynarczyk, Beth; Valverde, Sam; Stegman, Michael; Bowler, Timothy; Roberts, Benson; Chepenik, Adam; Foster, Jeff; Goldblatt, Alan; Woolf, Andrew; Franco, Jamie; Kingsley, Darius; Gelber, Alexander; Abraham, Lisa; Eagan, Kristin; Hipple,	Deliberative Process	Draft policy document prepared by Treasury staff for the Secretary containing predecisional information and analysis related to various aspects of housing finance reform.
224	7/9/2012	Mlynarczyk, Beth	Mlynarczyk, Beth; Valverde, Sam; Stegman, Michael; Bowler, Timothy; Roberts, Benson; Chepenik, Adam; Foster, Jeff; Goldblatt, Alan; Woolf, Andrew; Franco, Jamie; Kingsley, Darius; Gelber, Alexander; Abraham, Lisa; Eagan, Kristin; Hipple,	Deliberative Process	Draft policy document prepared by Treasury staff for the Secretary containing predecisional information and analysis related to various aspects of housing finance reform.
225	7/9/2012	Mlynarczyk, Beth	Mlynarczyk, Beth; Valverde, Sam; Stegman, Michael; Bowler, Timothy; Roberts, Benson; Chepenik, Adam; Foster, Jeff; Goldblatt, Alan; Woolf, Andrew; Franco, Jamie; Kingsley, Darius; Gelber, Alexander; Abraham, Lisa; Eagan, Kristin; Hipple, Elizabeth; Lee, Sandra	Deliberative Process	Draft policy document prepared by Treasury staff for the Secretary containing predecisional information and analysis related to various aspects of housing finance reform.

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226	7/9/2012	Goldblatt, Alan	Mlynarczyk, Beth; Stegman, Michael; Bowler, Timothy; Foster, Jeff; Chepenik, Adam	Deliberative Process	Email communication among senior Treasury staff attaching and commenting on draft policy document for the Secretary containing predecisional information and analysis related to various aspects of housing finance reform.
227	7/9/2012	Goldblatt, Alan	Mlynarczyk, Beth; Stegman, Michael; Bowler, Timothy; Foster, Jeff; Chepenik, Adam	Deliberative Process	Draft policy document prepared by Treasury staff for the Secretary containing predecisional information and analysis related to various aspects of housing finance reform.
228	7/9/2012	Mlynarczyk, Beth	Stegman, Michael; Bowler, Timothy; Foster, Jeff; Goldblatt, Alan; Valverde, Sam; Chepenik, Adam	Deliberative Process	Draft policy document prepared by Treasury staff for the Secretary containing predecisional information and analysis related to various aspects of housing finance reform.
229	7/9/2012	Mlynarczyk, Beth	Stegman, Michael; Bowler, Timothy; Foster, Jeff; Goldblatt, Alan; Chepenik, Adam	Deliberative Process	Draft policy document prepared by Treasury staff for the Secretary containing predecisional information and analysis related to various aspects of housing finance reform.
230	7/6/2012	Valverde, Sam	Bowler, Timothy	Deliberative Process	Email communication among Treasury staff containing predecisional information and analysis related to Fannie Mae financial projections.
231	7/6/2012	Valverde, Sam	Bowler, Timothy	Deliberative Process	Email communication among Treasury staff containing predecisional information and analysis related to Fannie Mae financial projections.

Exhibit D

REDACTED

Exhibit E

From: Vince Colatriano
Sent: Monday, March 23, 2015 4:54 PM
To: Schwind, Gregg (CIV)
Cc: Hosford, Elizabeth (CIV); Brian Barnes; David Thompson
Subject: RE: Fairholme v. US; Revised Privilege Log (PROTECTED INFORMATION)

Gregg –

In our view, the revised Treasury privilege log you sent us on Friday does not qualify as Protected Information. Please treat this email, therefore, as a notice, pursuant to Paragraph 17 of the Protective Order, of our belief that the log should not continue to be treated as Protected Information. In order to discharge our obligation under the Protective Order to try to resolve any dispute as to the treatment of the log within 5 business days, we ask that you get back to us as promptly as possible with your views on this issue. We are particularly interested in your views as to which information appearing in the revised log meets the Protective Order's definition of Protected Information, and how that information differs from the information provided in previous privilege logs provided by the Government, none of which were designated as Protected Information.

Thanks

Vince

Vincent J. Colatriano
Cooper & Kirk, PLLC
1523 New Hampshire Ave. NW
Washington, D.C. 20036
202-220-9656
www.cooperkirk.com

From: Schwind, Gregg (CIV) [<mailto:Gregg.Schwind@usdoj.gov>]
Sent: Friday, March 20, 2015 7:29 PM
To: Vince Colatriano

Cc: Hosford, Elizabeth (CIV); Brian Barnes; David Thompson

Subject: Fairholme v. US; Revised Privilege Log (PROTECTED INFORMATION)

Vince: Attached please find our first revised Treasury privilege log. Let us know if you have any questions.

Gregg

Gregg M. Schwind

Senior Trial Counsel

U. S. Department of Justice

(202) 353-2345

Overnight address:

1100 L Street, N.W.

Washington, D.C. 20005

Exhibit F

From : Vince Colatriano
Sent: Tuesday, March 31, 2015 11:09 PM
To: Schwind, Gregg (CIV)
Cc: Hosford, Elizabeth (CIV); Brian Barnes; David Thompson
Subject: RE: Fairholme v. US; Revised Privilege Log (PROTECTED INFORMATION)

Gregg –

Not having heard back from you on our March 23 email (below) seeking to resolve our dispute over whether the revised Treasury privilege log qualifies as Protected Information, I wanted to give you a heads up that you should consider this email to constitute our notice, under Paragraph 17 of the Protective Order, of our intent to seek a ruling from the Court on this issue. In the meantime, we of course remain open to considering any views you might have on our request to “de-designate” the log.

On a related note, after further examining the revised log, the only real difference we could find between it and previous unprotected logs you have provided is the addition of email addresses on the revised log. While we do not believe that the addition of email addresses suffices to qualify the log as protected, we are willing, on the assumption that that was the change that prompted the Government to designate the log as protected, to redact the email addresses from the log. Please let us know if, with that change, the Government will agree to “de-designate” the log. Moreover, if, again, the addition of email addresses was the determining factor on this issue, we request that such email addresses be omitted from or redacted from future privilege logs.

As always, please let me know if you have any questions.

Thanks

Vince

Vincent J. Colatriano

Cooper & Kirk, PLLC
1523 New Hampshire Ave., NW
Washington, D.C. 20036
www.cooperkirk.com

From: Vince Colatriano
Sent: Monday, March 23, 2015 4:54 PM
To: Schwind, Gregg (CIV)
Cc: Hosford, Elizabeth (CIV); Brian Barnes; David Thompson
Subject: RE: Fairholme v. US; Revised Privilege Log (PROTECTED INFORMATION)

Gregg –

In our view, the revised Treasury privilege log you sent us on Friday does not qualify as Protected Information. Please treat this email, therefore, as a notice, pursuant to Paragraph 17 of the Protective Order, of our belief that the log should not continue to be treated as Protected Information. In order to discharge our obligation under the Protective Order to try to resolve any dispute as to the treatment of the log within 5 business days, we ask that you get back to us as promptly as possible with your views on this issue. We are particularly interested in your views as to which information appearing in the revised log meets the Protective Order's definition of Protected Information, and how that information differs from the information provided in previous privilege logs provided by the Government, none of which were designated as Protected Information.

Thanks

Vince

Vincent J. Colatriano
Cooper & Kirk, PLLC
1523 New Hampshire Ave. NW
Washington, D.C. 20036
202-220-9656
www.cooperkirk.com

From: Schwind, Gregg (CIV) [<mailto:Gregg.Schwind@usdoj.gov>]
Sent: Friday, March 20, 2015 7:29 PM
To: Vince Colatriano
Cc: Hosford, Elizabeth (CIV); Brian Barnes; David Thompson
Subject: Fairholme v. US; Revised Privilege Log (PROTECTED INFORMATION)

Vince: Attached please find our first revised Treasury privilege log. Let us know if you have any questions.

Gregg

Gregg M. Schwind
Senior Trial Counsel
U. S. Department of Justice
(202) 353-2345

Overnight address:
1100 L Street, N.W.
Washington, D.C. 20005

Exhibit G

From: Schwind, Gregg (CIV) [<mailto:Gregg.Schwind@usdoj.gov>]
Sent: Thursday, April 02, 2015 8:23 AM
To: Vince Colatriano
Cc: Hosford, Elizabeth (CIV); Brian Barnes; David Thompson
Subject: RE: Fairholme v. US; Revised Privilege Log (PROTECTED INFORMATION)

Vince:

We will not agree to de-designate the privilege log. The information in the log meets the definition of “protected information” in the protective order. Moreover, Fairholme has not offered any justification for its request or otherwise stated why it needs the log to be de-designated. Thanks.

Gregg

From: Vince Colatriano [<mailto:vcolatriano@cooperkirk.com>]
Sent: Tuesday, March 31, 2015 11:09 PM
To: Schwind, Gregg (CIV)
Cc: Hosford, Elizabeth (CIV); Brian Barnes; David Thompson
Subject: RE: Fairholme v. US; Revised Privilege Log (PROTECTED INFORMATION)

Gregg –

Not having heard back from you on our March 23 email (below) seeking to resolve our dispute over whether the revised Treasury privilege log qualifies as Protected Information, I wanted to give you a heads up that you should consider this email to constitute our notice, under Paragraph 17 of the Protective Order, of our intent to seek a ruling from the Court on this issue. In the meantime, we of course remain open to considering any views you might have on our request to “de-designate” the log.

On a related note, after further examining the revised log, the only real difference we could find between it and previous unprotected logs you have provided is the addition of email addresses on the revised log. While we do not believe that the addition of email addresses suffices to qualify the log as protected, we are willing, on the assumption that that was the change that prompted the Government to designate the log as protected, to redact the email addresses from the log. Please let us know if, with that change, the Government will agree to “de-designate” the log. Moreover, if, again, the addition of email addresses was the determining factor on this

issue, we request that such email addresses be omitted from or redacted from future privilege logs.

As always, please let me know if you have any questions.

Thanks

Vince

Vincent J. Colatriano
Cooper & Kirk, PLLC
1523 New Hampshire Ave., NW
Washington, D.C. 20036
www.cooperkirk.com

From: Vince Colatriano
Sent: Monday, March 23, 2015 4:54 PM
To: Schwind, Gregg (CIV)
Cc: Hosford, Elizabeth (CIV); Brian Barnes; David Thompson
Subject: RE: Fairholme v. US; Revised Privilege Log (PROTECTED INFORMATION)

Gregg –

In our view, the revised Treasury privilege log you sent us on Friday does not qualify as Protected Information. Please treat this email, therefore, as a notice, pursuant to Paragraph 17 of the Protective Order, of our belief that the log should not continue to be treated as Protected Information. In order to discharge our obligation under the Protective Order to try to resolve any dispute as to the treatment of the log within 5 business days, we ask that you get back to us as promptly as possible with your views on this issue. We are particularly interested in your views as to which information appearing in the revised log meets the Protective Order's definition of Protected Information, and how that information differs from the information provided in previous privilege logs provided by the Government, none of which were designated as Protected Information.

Thanks

Vince

Vincent J. Colatriano
Cooper & Kirk, PLLC
1523 New Hampshire Ave. NW
Washington, D.C. 20036

202-220-9656

www.cooperkirk.com

From: Schwind, Gregg (CIV) [<mailto:Gregg.Schwind@usdoj.gov>]
Sent: Friday, March 20, 2015 7:29 PM
To: Vince Colatriano
Cc: Hosford, Elizabeth (CIV); Brian Barnes; David Thompson
Subject: Fairholme v. US; Revised Privilege Log (PROTECTED INFORMATION)

Vince: Attached please find our first revised Treasury privilege log. Let us know if you have any questions.

Gregg

Gregg M. Schwind
Senior Trial Counsel
U. S. Department of Justice
(202) 353-2345

Overnight address:
1100 L Street, N.W.
Washington, D.C. 20005

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To: bbarnes@cooperkirk.com [Remove](#) this sender from my allow list
From: gregg.schwind@usdoj.gov

You received this message because the sender is on your allow list.

Exhibit H

In the Matter of:

Fairholme Funds, Inc., et al. v. USA

July 16, 2014

Condensed Transcript with Word Index



For The Record, Inc.
(301) 870-8025 - www.ftrinc.net - (800) 921-5555

1

1 UNITED STATES COURT OF FEDERAL CLAIMS
2
3
4 FAIRHOLME FUNDS, INC., ET AL.,)
5 Plaintiffs,) Case No.
6 vs.) 13-465C
7 THE UNITED STATES OF AMERICA,)
8 Defendant.)
9
10
11
12 Courtroom 4
13 Howard T. Markey National Courts Building
14 717 Madison Place, N.W.
15 Washington, D.C.
16 Wednesday, July 16, 2014
17 2:00 p.m.
18 Status Conference
19
20
21 BEFORE: THE HONORABLE MARGARET M. SWEENEY
22
23
24
25 Elizabeth M. Farrell, CERT, Digital Transcriber

3

1 P R O C E E D I N G S
2 - - - - -
3 (Proceedings called to order at 2:03 p.m.)
4 LAW CLERK: The United States Court of Federal
5 Claims is now in session. Fairholme Funds, Incorporated vs.
6 the United States, Case Number 13-465, the Honorable Margaret
7 M. Sweeney presiding.
8 THE COURT: Good afternoon. Please be seated.
9 (Chorus of good afternoons.)
10 THE COURT: Would counsel in the courtroom please
11 identify themselves for the record.
12 MR. COOPER: Of course, Your Honor, thank you.
13 Charles Cooper for the Plaintiffs, Your Honor. And with me
14 today are my partners, Vince Colatriano.
15 MR. COLATRIANO: Good afternoon, Your Honor.
16 MR. COOPER: And David Thompson. Also joining us
17 for the Plaintiffs on the phone, Your Honor, are Brian Barnes
18 and Nicole Moss.
19 THE COURT: Very good, thank you. Good afternoon.
20 And for the United States?
21 MR. DINTZER: Good afternoon, Your Honor, Kenneth
22 Dintzer for the United States Department of Justice. And
23 with me here is Elizabeth Hosford and Gregg Schwind from our
24 office.
25 THE COURT: Thank you very much. Well, we're ready

2

1 APPEARANCES:
2 ON BEHALF OF THE PLAINTIFFS:
3 CHARLES J. COOPER, ESQ.
4 VINCENT J. COLATRIANO, ESQ.
5 BRIAN BARNES, ESQ.
6 DAVID THOMPSON, ESQ.
7 NICOLE J. MOSS, ESQ.
8 Cooper & Kirk, PLLC
9 1523 New Hampshire, NW
10 Washington, DC 20036
11 (202) 220-9600
12 ccooper@cooperkirk.com
13
14
15 ON BEHALF OF THE DEFENDANT:
16 KENNETH MICHAEL DINTZER, ESQ.
17 GREGG M. SCHWIND, ESQ.
18 ELIZABETH M. HOSFORD, ESQ.
19 U.S. Department of Justice
20 Post Office Box 480
21 Ben Franklin Station
22 Washington, DC 20044
23 (202) 616-0385
24 kenneth.dintzner@usdoj.gov
25

4

1 to begin.
2 MR. COOPER: Thank you very much, Your Honor.
3 Charles Cooper again for the Plaintiffs. Since we were with
4 you last, Your Honor, the parties have been hard at work on
5 negotiating, in a very professional, mutually cooperative way
6 and, I think, fruitful way, the confidentiality order that
7 we're trying to get squared away, both in -- in compromise on
8 each side. But there are a couple of points, Your Honor,
9 that are sticking for each side. And, so, we brought them to
10 you with apologies for, once again, crowding your docket and
11 your patience.
12 THE COURT: Never needed. Both sides are excellent
13 advocates for your clients and that's just what I would
14 expect.
15 MR. COOPER: Thank you very much, Your Honor. And
16 with the Court's permission, I'd like to ask Mr. Colatriano
17 who has been handling the discussions with our friends from
18 the Department of Justice to address the Court on the
19 specifics of those issues.
20 THE COURT: Please. Thank you.
21 MR. COLATRIANO: Good afternoon, Your Honor.
22 THE COURT: Good afternoon.
23 MR. COLATRIANO: May it please the Court. As Mr.
24 Cooper mentioned, there are two issues that, in our view, are
25 quite closely related to each other on which the parties have

5	<p>1 been unable to reach agreement. These issues, in our view, 2 basically go to whether the producing party in discovery 3 should be allowed to designate virtually everything it 4 produces as protected and to maintain that designation 5 throughout this litigation and even beyond, regardless of 6 whether that information is truly deserving of such 7 protection.</p> <p>8 THE COURT: Does this mean you're going to be 9 focusing exclusively on paragraph 17, I think it was, of your 10 order or are you going -- is this a more global approach?</p> <p>11 MR. COLATRIANO: There are two paragraphs where we 12 have a disagreement. The first, I think, is paragraph 4.</p> <p>13 THE COURT: I thought there was more than that -- 14 more than two, but, okay, thank you.</p> <p>15 MR. COLATRIANO: I think it's two paragraphs. One 16 is -- the first is in paragraph two, which is the definition 17 of protected information.</p> <p>18 THE COURT: Yes.</p> <p>19 MR. COLATRIANO: The second issue is in paragraph, 20 I believe it's 19.</p> <p>21 THE COURT: Nineteen, yes.</p> <p>22 MR. COLATRIANO: Which deals with what happens when 23 a party challenges designation of material as protected. I 24 believe those are the two issues that are really (inaudible) 25 the parties.</p>	7	<p>1 And it's not just the litigants in the Court that 2 have an interest in that; the public has an interest in what 3 happens in judicial proceedings in Federal Courts. And if 4 anything, the public's interest is even stronger in the case 5 involving the actions of public officials and agencies on 6 matters of public concern, as this case unquestionably is. 7 And, so, in our view, federal agencies should not be allowed 8 to presumptively shield all of the information produced in 9 discovery from such public scrutiny.</p> <p>10 This presumption, we would submit, is reflected in 11 the discovery rules and, in particular, Rule 26C, the rule 12 authorizing the issuance of protective orders. With these 13 reasons under the rule, there needs to be a good reason for 14 the imposition of restrictions on the availability of 15 materials produced in discovery and it is the party who is 16 seeking to impose those restrictions who must bear the burden 17 of demonstrating the existence of that good reason. These 18 principles are embodied in the requirement that a protective 19 order can only issue upon a showing of good cause.</p> <p>20 We believe that our proposed order is consistent 21 with those principles, while the Government's not only runs 22 afoul of those principles, it, in some respects, stands those 23 principles on their head.</p> <p>24 With respect to the first issue, the definition of 25 protected information, I -- in keeping with the presumption</p>
6	<p>1 THE COURT: Yeah, I should -- I was just giving you 2 a peek behind the curtain. I had found some -- I can't say 3 areas of great concern, but some additional language that I 4 intended to include. So, that's fine.</p> <p>5 MR. COLATRIANO: That's obviously fine with us as 6 well, but --</p> <p>7 THE COURT: And I'm sure you all will let me know 8 if what I have inserted into the protective order is 9 problematic.</p> <p>10 MR. COLATRIANO: The two issues on which we do 11 disagree I think are pretty related in that it deals with the 12 definition of protected information and what happens if 13 somebody challenges the designation of materials as 14 protected. And we believe that the Government's position on 15 both issues finds no support in the language of the rule or 16 the relevant case law and would cause the parties, in some 17 respects, the Court (inaudible) significant prejudice.</p> <p>18 We believe that both issues need to be assessed by 19 the Court against the backdrop of some of (inaudible) 20 principles. The most important one being that there is a 21 presumption that information produced in discovery should not 22 be automatically subject to cumbersome and inefficient 23 descriptions on use and disclosure. Those restrictions 24 impose real burdens on the parties and the Court and they 25 should, therefore, be the exception rather than the rule.</p>	8	<p>1 in favor -- or the presumption against the restriction on 2 these materials and the plain language of Rule 26C, the law 3 is clear, as discussed in our filing, that materials produced 4 in discovery should not be indiscriminately designated as 5 protected with all the restrictions that that status carries 6 with it.</p> <p>7 Rather, the law requires that materials be 8 considered truly sensitive in some legally cognizable way 9 before they should be afforded protective status. That means 10 both that the materials must be treated as confidential and 11 that the public release of those materials would cause some 12 real specified, or would at least be likely to cause, some 13 real specified harm. Blanket and general allegations of 14 confidentiality are not sufficient in this regard.</p> <p>15 (Pause in the proceedings.)</p> <p>16 LAW CLERK: I would ask again for the parties 17 (inaudible) to please mute their lines. We're getting some 18 feedback from some conversations.</p> <p>19 THE COURT: You can also let them know that it's 20 disruptive to court proceedings.</p> <p>21 LAW CLERK: The Judge has actually expressed that 22 it is disruptive to court proceedings, so please do mute your 23 lines and give a check that they are muted. Thank you.</p> <p>24 THE COURT: Sorry for the interruption. Please 25 proceed.</p>

9	11
<p>1 MR. COLATRIANO: Oh, no problem. Thank you, Your 2 Honor. Blanket and general allegations of confidentiality 3 are not sufficient under the rule. As this Court has 4 observed on multiple occasions, there must be some 5 particularized factual showing of the harm that would be 6 sustained if the protective order is not entered. For that 7 reason, protection is typically limited to materials that are 8 proprietary in nature, trade secrets or information that 9 would cause competitive harm if they were released or that 10 would cause some type of breach of personal privacy. 11 It is improper under the rules, we would submit, 12 for a party to just make wholesale and discriminative 13 designations of all the materials it produces in discovery as 14 protected. Having said that, as the Court is aware from its 15 review of the orders that have been provided, we have agreed, 16 in an effort to expedite discovery, that at least as an 17 initial matter, the Government can designate everything it 18 produces because that -- they told us that that's what they 19 intended to do in order to expedite discovery. We're not 20 thrilled with that, but that's something we were willing to 21 agree to in order to expedite that. 22 But that still begs the question of what -- of how 23 you should define protected information in the case of any 24 type of dispute between the parties as to whether the 25 Government over-designated.</p>	<p>1 very late in the game. It was back on Friday afternoon, by 2 the Government. They had not proposed that before. I don't 3 think we would have a problem with that word as long as it 4 weren't meant to describe anything that's not publicly -- 5 that hasn't publicly been released is, therefore, protected. 6 We don't think that's the standard. In the case law, 7 confidential, in this context, usually means something whose 8 disclosure could cause some harm. So, the mere fact that it 9 hasn't already been publicly released is not sufficient. 10 THE COURT: Yes. 11 MR. COLATRIANO: And, so, it's not -- 12 THE COURT: No, I agree with you. I did -- I was 13 having difficulty understanding, though, why Plaintiff 14 opposed "confidential." So, that's -- 15 MR. COLATRIANO: That was added literally at the -- 16 by the Government at the last minute on Friday and they added 17 it as a stand-alone category. And if what they meant was it 18 hasn't been publicly -- if it hasn't already been publicly 19 released, it should never be publicly released or it should 20 have these restrictions, then we don't agree with that. 21 But -- 22 THE COURT: Well, I don't think that's the 23 understood definition of confidential. 24 MR. COLATRIANO: And with that understanding, if 25 it's something that (inaudible) disclosure would cause these</p>
10	12
<p>1 Our proposed definition in our proposed paragraph 2 2 fully satisfies the relevant principles underlying Rule 26C 3 and fully protects any interest a producing party may have in 4 protecting against the disclosure of information that is 5 legitimately viewed as sensitive. We have defined protected 6 information to include proprietary, trade secret or market- 7 sensitive information, as well as other information that is 8 otherwise protected from disclosure under applicable law. 9 That standard, we would submit, is consistent with the 10 language of the rules and the case law. 11 And by including the term "market-sensitive 12 information," the proposal will protect any information whose 13 disclosure would have the types of market distorting or 14 economic effects that the Government has warned about in its 15 separate pending motion for protective order regarding 16 materials related to the conservatorships. And, in fact, we 17 took the term "market-sensitive information" from the 18 Government's own proposal. We had originally proposed 19 something like competitively-sensitive information. The 20 Government responded by proposing "market-sensitive" and 21 we've adopted that. We think that makes sense in the context 22 of this case. 23 THE COURT: But you did not agree with the word 24 "confidential." 25 MR. COLATRIANO: The word "confidential" was added</p>	<p>1 types of legally recognizable harm, I don't think Plaintiff's 2 would have a problem with that. It was a last-minute 3 addition and, so, we just didn't sweep it up in our proposal. 4 But with that understanding, I don't think we would have a 5 problem with that type of amendment to our proposal. 6 But the Government's proposal goes well beyond just 7 adding the word "confidential," and it goes well beyond Rule 8 26C in the case law. The Government's proposed definition 9 just lists categories of materials that when you add them all 10 together, I think it's pretty apparent that they want to 11 designate everything as confidential and keep it confidential 12 throughout the course of this litigation, regardless of 13 whether that information is truly sensitive or whether the 14 disclosure of that information would cause any cognizable 15 harm to anyone. 16 THE COURT: But would you agree that the other two 17 words were "financial" and "operational," but there may very 18 well be documents that would fall into the financial realm or 19 operational categories that may, in fact, be properly -- find 20 themselves on a privilege log on or at least they should be 21 the subject of a protective order? 22 MR. COLATRIANO: Certainly, if there's anything 23 that's privileged, obviously, the Government's going to 24 assert privileges. If financial information is market 25 sensitive, in other words, this disclosure would cause a type</p>

13	<p>1 of market-distorting effects that the Government has</p> <p>2 complained about in its other motion --</p> <p>3 THE COURT: And that's already covered. They've</p> <p>4 already --</p> <p>5 MR. COLATRIANO: Then we can --</p> <p>6 THE COURT: By market sensitive.</p> <p>7 MR. COLATRIANO: Exactly. That would be covered by</p> <p>8 our proposal. If what -- though what the Government means is</p> <p>9 that any information that discusses financial matters or that</p> <p>10 discusses operational matters, whatever that means, it's not</p> <p>11 a very defined term. If what they mean is that as long as it</p> <p>12 discusses financial or operational matters in any way, then</p> <p>13 it falls under this definition, then no, we would not agree</p> <p>14 with that because I think that would -- A, it's very vague,</p> <p>15 but, B, it would sweep within it all information produced in</p> <p>16 a case of this nature.</p> <p>17 THE COURT: I agree with you.</p> <p>18 MR. COLATRIANO: And then when you add up all these</p> <p>19 definitions, these terms, I think it's pretty clear that the</p> <p>20 Government wants to keep everything it produces as</p> <p>21 confidential. We're just speculating that that's what the</p> <p>22 Government wants to do because the Government goes on to</p> <p>23 further say that any information that has not been publicly</p> <p>24 released should be treated as confidential, since it's</p> <p>25 unlikely that the parties will focus their discovery efforts</p>	15
14	<p>1 on material that has already been publicly released, then</p> <p>2 this provision would -- this catchall provision would ensure</p> <p>3 that everything is maintained as confidential no matter how</p> <p>4 old it is, how stale it is, whether it's disclosure would</p> <p>5 cause any harm. We think that that proposal can't be squared</p> <p>6 with the law, it can't be squared with the language of Rule</p> <p>7 26C, it can't be squared with the case law that we discussed</p> <p>8 in our filing, including case law that makes clear that the</p> <p>9 Federal Circuit has been concerned about parties over-</p> <p>10 designating material.</p> <p>11 And one of the reasons we think the Government's</p> <p>12 proposal is unnecessary to protect any legitimate interest it</p> <p>13 may have is that the Government's own actions have confirmed</p> <p>14 that it doesn't need that type of protection. As we</p> <p>15 discussed in our filing in the companion litigation in the</p> <p>16 District Court before Judge Lambert, the Treasury produced</p> <p>17 and publicly filed what it called an administrative record</p> <p>18 and the Federal Housing Finance Agency produced and publicly</p> <p>19 filed what it called a document compilation relating to the</p> <p>20 net worth sweep.</p> <p>21 We think those submissions were woefully inadequate</p> <p>22 for many reasons, but the pertinent point here is that those</p> <p>23 submissions contained within them discussions of financial</p> <p>24 projections within the two companies and discussions that I</p> <p>25 think would fall under the definition of materials discussing</p>	16
	<p>1 the operation of the conservatorships. And, so -- and it</p> <p>2 contained information that was not already publicly released,</p> <p>3 at least some of the information meets those categories.</p> <p>4 This was, in short, information that falls squarely</p> <p>5 within the Government's proposed definition of protected</p> <p>6 information. But it was publicly filed in that case. And</p> <p>7 not only did the world not end when that happened, the</p> <p>8 Government hasn't suggested that any harm was caused to</p> <p>9 anyone when it released that information publicly. So, I</p> <p>10 think its own actions confirm that it doesn't need the types</p> <p>11 of protections that it's asking for in its submissions.</p> <p>12 The Government, I think it's -- in its submission</p> <p>13 in defense of its own proposal, doesn't cite to any legal</p> <p>14 authority that supports its proposed definition of protected</p> <p>15 information. It does take issue with our definition's</p> <p>16 reliance on trade secret and proprietary information and says</p> <p>17 that that won't protect it against the types of market-</p> <p>18 distorting effects that it's worried about from the public</p> <p>19 release of some of this information. But it ignores that our</p> <p>20 definition includes the term "market-sensitive," which is</p> <p>21 designed to take into account these concerns.</p> <p>22 And I do think it's useful to keep in mind that the</p> <p>23 Government's only recitation of harm in its submission in</p> <p>24 support of its proposal is its discussion of these types of</p> <p>25 market-distorting effects that were discussed in its motion</p>	

17	<p>1 think that that, in and of itself, defeats any type of</p> <p>2 argument that they have shown good cause for their</p> <p>3 definition.</p> <p>4 If I may very briefly touch on the second issue</p> <p>5 because I think a lot of what I just said relates to that,</p> <p>6 which is -- has to do with, as you know, the Government's</p> <p>7 going to -- or at least has told us, it's going to designate</p> <p>8 everything it produces as confidential. But there is a</p> <p>9 procedure for the receiving party to challenge that.</p> <p>10 THE COURT: Yes.</p> <p>11 MR. COLATRIANO: Under our proposal, in the event</p> <p>12 of such a challenge, the burden should be on the party who is</p> <p>13 asserting the confidentiality of the information to sustain</p> <p>14 that assertion.</p> <p>15 THE COURT: Well, you have to have discussions,</p> <p>16 right?</p> <p>17 MR. COLATRIANO: Yes.</p> <p>18 THE COURT: I mean, you're required to have the</p> <p>19 discussions. So, the Government has to lay out all its</p> <p>20 reasons as to why the material is properly designated under</p> <p>21 the protective order. There should be restricted access.</p> <p>22 Why -- shouldn't it be your burden because you're the one who</p> <p>23 wants to take away the protection?</p> <p>24 MR. COLATRIANO: Well, I think --</p> <p>25 THE COURT: Shouldn't we always defer on the side</p>	19	<p>1 MR. COLATRIANO: Your Honor, we certainly have no</p> <p>2 interest in being party to something that --</p> <p>3 THE COURT: Causing doomsday?</p> <p>4 MR. COLATRIANO: Exactly. So, we take very</p> <p>5 seriously our obligations as well. And, so, we don't -- we</p> <p>6 wouldn't be indiscriminately saying, you know, just release</p> <p>7 it all. But there is still an underlying good cause</p> <p>8 standard. But I do think there are a couple of different</p> <p>9 issues here. One is, who should bear the burden of sort of</p> <p>10 initiating a court proceeding if there is a challenge? We</p> <p>11 had proposed that it should be the producing party; the</p> <p>12 Government's proposed that it should be the receiving party.</p> <p>13 In some respects, that's not an incredibly</p> <p>14 important issue. The more important issue is, in any such</p> <p>15 proceedings, who should bear the burden of persuasion as to</p> <p>16 whether the material is confidential or not? We're prepared</p> <p>17 to yield on whether the receiving party or the producing</p> <p>18 party should initiate the court proceeding. But I think on</p> <p>19 the ultimate burden of persuasion, the burden should be on</p> <p>20 the party who is asserting confidentiality to show some type</p> <p>21 of harm.</p> <p>22 THE COURT: What does the case law say?</p> <p>23 MR. COLATRIANO: The case law that I have seen has</p> <p>24 said -- and I think this is the party who is asserting</p> <p>25 confidentiality who bears that burden. Now, I have seen</p>
18	<p>1 of protecting material?</p> <p>2 MR. COLATRIANO: Well, I'm not sure that that's the</p> <p>3 relevant standard when the standard is there needs to be good</p> <p>4 cause to restrict --</p> <p>5 THE COURT: Well, no. Yes, of course. But, I</p> <p>6 mean, presumably, from what the Government has said so far --</p> <p>7 I mean, I've only received certain information, but the harm</p> <p>8 that could result in markets crashing is quite dramatic. I</p> <p>9 mean, I really don't want something cataclysmic to happen</p> <p>10 because I was too generous in allowing certain discovery and</p> <p>11 that certain documents would either be -- either, A, I would</p> <p>12 not allow any privilege to attach and it would be disclosed</p> <p>13 and it could be relied upon in summary judgment briefings or</p> <p>14 it could be released to the public. And, yes, the public has</p> <p>15 an interest in knowing, but just as the FBI does not really</p> <p>16 disclose sources and methods in the manner in which it</p> <p>17 surveils spies and terrorists -- I mean, yes, people would</p> <p>18 really like to know, but we really don't want to disclose how</p> <p>19 the FBI is able to be effective and keep us safe.</p> <p>20 So, sort of the same reasoning, yes, the public has</p> <p>21 a right to know what officials are doing, but if the release</p> <p>22 of certain market information or financial information at</p> <p>23 this point in time could result in a market crash, as far as</p> <p>24 I'm concerned, it would be irresponsible to allow that</p> <p>25 information to go out and harm the public as a whole. So --</p>	20	<p>1 protective orders that have done this both ways.</p> <p>2 THE COURT: Yes.</p> <p>3 MR. COLATRIANO: In the Starr protective order,</p> <p>4 which we based a lot of our initial proposals on, it was the</p> <p>5 party resisting -- it was the party asserting confidentiality</p> <p>6 who bore that burden. But I have, I will admit, some</p> <p>7 protective orders where it's the party who is seeking to</p> <p>8 challenge the assertion of confidentiality who has the burden</p> <p>9 of at least initiating those proceedings. So, I've seen that</p> <p>10 both ways. I think the law is much more on the side of if</p> <p>11 somebody seeks to assert confidentiality, the burden of</p> <p>12 persuasion at least should be on that person.</p> <p>13 Overarching all of this is what should the standard</p> <p>14 be no matter who bears the burden on whether the information</p> <p>15 should be treated as confidential. And that's issue number</p> <p>16 one, sort of the definition of protected information. In</p> <p>17 many respects, it doesn't really matter who bears the burden</p> <p>18 if the standard is so broad that anything could meet it.</p> <p>19 And, so, we really do think that that is, in some respects,</p> <p>20 the paramount issue, the burden issue is important, but it</p> <p>21 secondary -- of secondary importance to the -- to what the</p> <p>22 standard should be.</p> <p>23 But we do think it makes sense, even if we have to</p> <p>24 -- or the receiving party has to initiate the proceedings, I</p> <p>25 think it makes the most sense for the party who is asserting</p>

21	<p>1 confidentiality to at least bear the burden of ultimate 2 persuasion on that. 3 And, so, unless the Court has any further questions 4 about our proposal... 5 THE COURT: No, thank you. 6 MR. COLATRIANO: Thank you. 7 MR. DINTZER: Your Honor, Mr. Schwind will be 8 delivering the analysis from the United States. 9 THE COURT: Thank you very much. 10 MR. SCHWIND: Good afternoon, Your Honor. 11 THE COURT: Good afternoon, Mr. Schwind. 12 MR. SCHWIND: We do have a number of responses to 13 Plaintiffs' arguments presented in the joint status report 14 and this afternoon to the Court. But, first, just some brief 15 overarching observations about where we are in this case and 16 the context of the protective order. With respect to the 17 disputed terms, the Government is not seeking to limit 18 discovery to Plaintiff. That's not what this is about. 19 We're not seeking to deny Plaintiffs access to documents. 20 It's a very different situation and it's a situation that 21 comes up in many published decisions where one side or the 22 other seeks to just limit discovery. 23 We're just talking about whether or not and under 24 what circumstances we can designate certain documents 25 protective. Both sides agree there's a need for a protective</p>	23	<p>1 one of those two terms, and it gives me pause. 2 MR. SCHWIND: And we understand that, Your Honor, 3 and we concede there is quite a bit of redundancy and overlap 4 in the terms that the United States has proposed to the 5 Court. And one way that we look at this is the Court can 6 essentially choose what it thinks is most appropriate for 7 this case. And that's another one of the overarching points. 8 This Court -- this is a -- as we've said all along, this is a 9 very unique case, and this Court certainly has the authority 10 to craft a protective order that meets the particular needs 11 in a particular case. The Court is not limited, as 12 Plaintiffs seem to imply, to trade secrets and whatnot under 13 -- I guess it's Rule 26C(1)(g). 14 There are other bases there as well, including an 15 overarching basis that -- or overarching authority that the 16 Court has to specify the terms for disclosure or discovery as 17 part of this Court's inherent authority and this Court has 18 recognized that in the past. And that's why we think it's 19 important to look at this particular case and also -- and the 20 concerns that we raised in our motion for protective order 21 previously, and also the posture of this case. 22 Many of the public interest concerns that the Court 23 has cited and Plaintiffs have cited, those arise not in the 24 context of pre-motion to dismiss exchanges of documents 25 between parties. They arise in the context of judicial</p>
22	<p>1 order here. 2 THE COURT: Let me ask you something. As I 3 understand Plaintiffs' counsel's argument, the Government has 4 indicated it intends to designate all material it produces as 5 protected. Is that correct? 6 MR. SCHWIND: Initially, Your Honor, yes. And 7 Plaintiffs have agreed with that -- 8 THE COURT: Okay. 9 MR. SCHWIND: -- process. 10 THE COURT: And then? 11 MR. SCHWIND: And then there would be a process 12 where we would go back and look at the documents and 13 undesignate documents that do not meet the definition that 14 the Court puts in the order. 15 THE COURT: Okay. 16 MR. SCHWIND: So... 17 THE COURT: Well, you would realize even -- let's 18 say I do not accept "financial" or "operation" as one of the 19 definitions. It doesn't mean that certain financial 20 documents or certain operational documents could not be the 21 subject of a protective order. 22 MR. SCHWIND: Yes, Your Honor. There is -- 23 THE COURT: I'm just concerned that the "financial" 24 and "operational" might be too broad, that almost anything 25 coming out of the agency could be designated or fall under</p>	24	<p>1 records and court filings and the public interest in having 2 access. The presumption, essentially, is that the public has 3 access to the judicial system to see what is happening in 4 that system. And that's when the -- when these decisions 5 that come out about the burden on the Government or the 6 burden on whatever party is seeking to keep those matters 7 confidential, we readily recognize that and that burden -- if 8 we were there -- we are not there. 9 What we are trying to do right now is to facilitate 10 disclosure to Plaintiffs in order to respond to a motion to 11 dismiss in a case where this Court has not yet even found 12 that it has jurisdiction over Plaintiffs' claim, in a case in 13 which this Court has yet to find that Plaintiffs have even 14 stated a claim. 15 So -- 16 THE COURT: Well, that doesn't mean that I will, 17 but that doesn't mean that I won't. 18 MR. SCHWIND: Correct, Your Honor. And when we get 19 to that point -- and Plaintiffs, for example, bring up Starr 20 and the protective order there and whatnot. That is a case 21 that is fundamentally different on its facts, but it's also 22 fundamentally different in its posture, that is post-motion 23 to dismiss, the parties are ready for trial, their documents 24 are being exchanged, have been exchanged. It's entirely 25 different than where we are here and we think that's</p>

<p style="text-align: right;">25</p> <p>1 important. And the public interest is not the same as if we 2 were talking about the context of judicial records, court 3 filings. We're talking now about just simply facilitating 4 disclosure to Plaintiffs to allow them to respond to a motion 5 to dismiss. It's a very different posture. 6 And, again, there is no question of prejudice to 7 the Plaintiffs. The Plaintiffs' counsel will have access to 8 these documents. They're going to be able to make whatever 9 use they can make of them in responding to our motion to 10 dismiss. The only question is whether or not we get to 11 designate or what the terms are of our ability -- as the one 12 party that's going to be producing documents, to designate 13 these documents are protected. That's the only issue. 14 THE COURT: Well, remember, even if I don't accept 15 the terms "financial" and "operational," you don't lose the 16 ability to designate such documents. 17 MR. SCHWIND: Yes, correct, Your Honor. 18 THE COURT: So, you haven't lost -- I think 19 "financial" and "operational" in paragraph 2, the way it's 20 drafted is too broad. But, again, you haven't lost anything. 21 It may be that when certain financial or operational 22 documents that would be otherwise be disclosed perhaps, if 23 you believe they are sensitive and are properly the subject 24 of the protective order, you're not going to be shy about 25 letting the Plaintiffs know. And then, ultimately, I may</p>	<p style="text-align: right;">27</p> <p>1 of protected or a privilege designation, that the burden 2 logically is on the party making the challenge to bring that 3 motion, to identify the documents that -- after hearing what 4 the Government -- or hearing the producing party's response 5 to why it made the designation, to then really sitting down 6 and deciding, okay, which ones do we really want to bring a 7 challenge to, which ones really matter to us. And then 8 limiting its motion to that. 9 If the burden is on the producing party, again, 10 here the United States -- the only party that's going to be 11 producing documents at this stage of litigation, Plaintiffs 12 can essentially just tee them all up, tee up all the 13 documents. Just say -- and tie us up essentially in a motion 14 to justify the designation of most or all of what we've 15 designated confidential. We don't think that serves anyone's 16 interest. 17 As far as the burden, once that motion is filed, I 18 think Plaintiffs, we'd agree, are correct. There's an 19 authority problem on both sides of that issue as far as who 20 bears the burden of persuasion to justify that. But I think 21 the burden would be limited to showing that the designation 22 falls within the doc -- within the definition in the 23 protective order. I say that because many of the cases that 24 Plaintiffs rely on when we're talking about who bears the 25 burden are in a different context.</p>
<p style="text-align: right;">26</p> <p>1 have to make a determination as to whether or not you were 2 correct. 3 MR. SCHWIND: Thank you. We appreciate that. We 4 haven't seen -- 5 THE COURT: But you want it that way? 6 MR. SCHWIND: Well, again, one way we look at this 7 is as choices for the Court. And, again, we understand -- we 8 can see there's redundancy in that, and I think the Court is 9 absolutely correct. It's -- 10 THE COURT: It kind of looks like hands tied behind 11 back to me. But I thought it was much too restrictive. The 12 -- using the words -- to include the words "financial" and 13 "operational," I thought that was really -- I didn't think it 14 should be in the protective order. 15 MR. SCHWIND: Oh, I understand -- understood, Your 16 Honor. Well, we appreciate that. 17 And with respect to the burden issue, I think 18 Plaintiffs appear to recognize today, we're talking really 19 about two burdens, if you will. The person having the burden 20 is just who has the responsibility to bring the motion 21 challenging a protected designation. That's one burden. 22 And the second burden is, okay, once that motion is 23 filed, who bears the burden of persuasion in that motion. 24 And we think -- and I think, as the Court has hinted, that 25 when a party seeks to challenge something like a designation</p>	<p style="text-align: right;">28</p> <p>1 Oftentimes, after a court issues a decision, it 2 publishes the decision just to the parties and says, okay, 3 within two weeks, proposed redactions. Sometimes there are 4 disputes. 5 THE COURT: Yes. 6 MR. SCHWIND: Sometimes one side says no and we 7 don't want that to be redacted, and it turns into a motion. 8 That motion, the basis for that motion to challenge that 9 redaction is not the protective order; it's essentially case 10 law that says there is a presumption of the -- that things 11 are going to -- again, the judicial record is going to be out 12 there. It's in the public interest. And there's some 13 factors and there are cases that go down and talk about that. 14 It's a very different scenario. 15 Again, it gets back to my original -- one of my 16 original points that at this stage of litigation, it does 17 make sense to put that burden on Plaintiffs just for this 18 limited purpose of allowing the United States to designate 19 documents as protected. We're not talking about whether or 20 not there's a public interest in what the parties ultimately 21 attach to court filings, to what ultimately the parties quote 22 in their filings where the public could very well have in 23 seeing that. 24 So, we think our proposal best meets the needs of 25 this case as far as facilitating disclosure of the documents</p>

29	<p>1 that Plaintiffs say they need, documents they say they need</p> <p>2 to respond to our motion to dismiss, minimizing the contested</p> <p>3 motions practice and allowing the Court to get to the point</p> <p>4 that we would very much like the Court to get to of deciding</p> <p>5 our motion to dismiss.</p> <p>6 THE COURT: Well, I can agree with that, my</p> <p>7 sentiments entirely. But Plaintiffs have to be able to have</p> <p>8 access to documents to establish this Court's jurisdiction.</p> <p>9 I mean, otherwise, they don't have their day in court if they</p> <p>10 don't have that opportunity.</p> <p>11 And one thing that does concern me is that the</p> <p>12 Government is going to designate the entire universe of</p> <p>13 documents as protected. And as I understand it, the</p> <p>14 Government still haven't reviewed all of those documents yet.</p> <p>15 So -- but I also understand you to say that despite that</p> <p>16 initial blanket designation, you will go back then and look</p> <p>17 at each document and make a determination as to whether or</p> <p>18 not it should be protected.</p> <p>19 MR. SCHWIND: Correct, Your Honor. And to the</p> <p>20 extent there's a disagreement, as Plaintiffs said, there is a</p> <p>21 process in the order that the parties can address those</p> <p>22 disagreements.</p> <p>23 THE COURT: Has the Government -- are you beginning</p> <p>24 -- how far along in your review are you?</p> <p>25 MR. SCHWIND: We're --</p>	31	<p>1 the protected designation.</p> <p>2 Will it be all the documents? No. But what we</p> <p>3 intend to do -- and I think this is not -- Plaintiffs won't</p> <p>4 object to this -- is to produce on a rolling basis so at</p> <p>5 least they start getting documents expeditiously.</p> <p>6 THE COURT: That's certainly not unusual, even in</p> <p>7 far less complicated cases. So, that makes good sense.</p> <p>8 MR. SCHWIND: Thank you, Your Honor.</p> <p>9 THE COURT: Thank you. Is there anything else for</p> <p>10 Plaintiff? Any response?</p> <p>11 MR. COLATRIANO: Very briefly.</p> <p>12 THE COURT: Certainly.</p> <p>13 MR. COLATRIANO: Thank you, Your Honor. We do</p> <p>14 agree, by the way, that it makes sense for the Government to</p> <p>15 produce these materials on a rolling basis. That was our</p> <p>16 understanding, that within a matter of days after the</p> <p>17 protective order is entered, that the Government would be in</p> <p>18 position to do that. So, we're happy to hear that.</p> <p>19 Very briefly, the Government -- Mr. Schwind said</p> <p>20 that we would not be prejudiced at all under their proposal</p> <p>21 because we're still going to be getting the documents.</p> <p>22 That's not quite accurate. There are restrictions in this</p> <p>23 protective order that, for example, restrict our ability to</p> <p>24 share this information with our clients, that if we -- and,</p> <p>25 so, lawyers, we might not be in the best position to</p>
30	<p>1 THE COURT: I assume you have people tasked to do</p> <p>2 this and they've been --</p> <p>3 MR. SCHWIND: One or two, Your Honor. Yes, we have</p> <p>4 people.</p> <p>5 THE COURT: It's an army, I take it, from that</p> <p>6 smile on your face, maybe --</p> <p>7 MR. SCHWIND: Well, we are substantially along. I</p> <p>8 don't want to -- I don't know how to phrase this, but we have</p> <p>9 started -- we started some time ago, weeks, at least, in</p> <p>10 reviewing documents for responses and privilege. We are not</p> <p>11 finished that process yet, but we do expect it to be</p> <p>12 concluded, I'd say, in the next -- within the next month.</p> <p>13 Again, we're definitely -- for what we've -- see,</p> <p>14 the Court has yet to issue its final ruling as far as the</p> <p>15 date ranges --</p> <p>16 THE COURT: You're going to see that very shortly.</p> <p>17 MR. SCHWIND: Okay. We definitely appreciate that,</p> <p>18 Your Honor. So, how far along we are, as far as percentage,</p> <p>19 is going to depend on what the Court ultimately says we have</p> <p>20 to review for responses and privilege. But right now, based</p> <p>21 on our initial proposal, which was thought (inaudible) what</p> <p>22 Plaintiffs wanted, we're certainly more than halfway along.</p> <p>23 So, we do expect, for example, that when the Court issues the</p> <p>24 protective order, that within -- I'd say within a week, we</p> <p>25 will start being able to produce documents to Plaintiffs with</p>	32	<p>1 interpret financial information in these materials, but we</p> <p>2 can't discuss them with our clients if it's been designated</p> <p>3 as protected. That's prejudice.</p> <p>4 There is a provision allowing us to hire financial</p> <p>5 consultants.</p> <p>6 THE COURT: Exactly.</p> <p>7 MR. COLATRIANO: But, you know, that's different</p> <p>8 from being able to talk about it with your clients. So,</p> <p>9 there are some -- there is some prejudice here associated</p> <p>10 with the designation of materials as prejudice. And it's</p> <p>11 also not quite accurate -- designation of materials as</p> <p>12 confidential.</p> <p>13 It's also not quite accurate to say that this is</p> <p>14 only about how we're going to be getting the documents. This</p> <p>15 protective order then talks about how we -- if we decide that</p> <p>16 we need to use those documents in any court filing, how we'd</p> <p>17 go about doing that. So, they would need to be filed under</p> <p>18 seal and things like that. And, so, the protective order</p> <p>19 does implicate this Court's -- filings in this Court and</p> <p>20 proceedings in this Court. And, so, that's why it's very</p> <p>21 important that the definition of protected information be</p> <p>22 clear and be fully protective of the Government's legitimate</p> <p>23 interests while not leading to over-designation of materials.</p> <p>24 In that regard, I do think it's worthwhile. The</p> <p>25 Court indicated that it has some problems with the</p>

33	<p>1 definitions -- with the terms "financial" and "operational." 2 We, obviously, share those concerns. But we also have the 3 Government's catchall provision that says any information 4 that has not been publicly released is, by definition, 5 protected. We think that's way too broad. 6 THE COURT: Right. I can tell you, I did not -- 7 that also jumped out at me immediately because it would seem 8 cumbersome to have -- let's say a reporter files a Freedom of 9 Information Act or by some other means obtains information 10 during the pendency of this case, and because it hasn't been 11 produced to you today, you couldn't have it. I mean, I just 12 -- no, that just -- that's just -- this isn't a legal term, 13 so forgive me, but it just seems silly. So, I mean -- and 14 just terribly unfair. And I was very -- well, the Government 15 attorneys are very good advocates and, so, I -- and I do 16 respect that. But that one didn't slide by me and that's not 17 going in the order. 18 MR. COLATRIANO: Your Honor, I think your comment 19 puts into sharp belief sort of what's a concern here. Under 20 the Government's proposal, if a member of the public submits 21 a FOIA request and gets something without any restrictions, 22 if we asked for the same documents, it would be subject to 23 all of these restrictions in discovery, and there's no basis 24 for that type of disparate treatment. 25 THE COURT: No. It would be silly to have</p>	35	<p>1 THE COURT: The way this is written, it could be so 2 interpreted. 3 MR. SCHWIND: Well, we think that would be 4 unreasonable, Your Honor. I mean, we share Your Honor's 5 concern. That was not our intent. But the intent was to 6 give us the broad ability to do it. But if -- but, 7 obviously, in that case, Plaintiffs could make -- bring a 8 challenge if we, for whatever reason, refused to agree that 9 even though the New York Times has a document, that ought to 10 remain confidential. Again, that was never our intent. 11 As far as Plaintiffs' statement that, well, we 12 won't have it. Well, there was never -- this isn't about 13 whether Plaintiffs have it or not; this is about whether or 14 not it has a protected designation. 15 THE COURT: Right. 16 MR. SCHWIND: That's all we're arguing. 17 THE COURT: Whether they can share it, whether it 18 will appear in briefs. 19 MR. SCHWIND: Whether they can share it. And the 20 Court correctly observed that while there are restrictions -- 21 and there are restrictions in every protective order as far 22 as who can see it -- in most protective orders, the clients 23 do not get to see it. So, that's nothing out of the 24 ordinary. 25 Plaintiffs have the ability to hire financial</p>
34	<p>1 something printed, the entire, say, document printed in a 2 Washington Post or New York Times article, but you couldn't 3 see it or you couldn't rely on it. You couldn't show it to 4 anyone. I mean, it just -- if everyone on the subway is 5 reading it, then Plaintiff should be able to use it without 6 any sort of a protective order attachment. So, I understand 7 your concern and that will not appear in the order. I am 8 happy to let you make some other comments, but I'm just 9 letting you know that that's coming. 10 MR. SCHWIND: Well, Your Honor -- 11 THE COURT: I didn't know whether -- 12 MR. COLATRIANO: No, I'm done. 13 THE COURT: I don't want to push you away. Are you 14 finished? 15 MR. COLATRIANO: No, I'm done. Thank you very 16 much, Your Honor. 17 THE COURT: Thank you very much. 18 MR. SCHWIND: I'm anxious to see -- to get into the 19 firing line here. 20 THE COURT: You can try and convince me why I'm 21 wrong. I -- 22 MR. SCHWIND: Your Honor, if a document is released 23 under FOIA, it becomes publicly available and we're not going 24 to -- we would never maintain a protected designation on a 25 document that's been released in FOIA. That's not our --</p>	36	<p>1 consultants to the ability they can't -- to the extent they 2 can't understand or want a professional opinion on what a 3 particular term means or a particular document means. They 4 can solve that problem with consultants. And if, for some 5 reason, the client just had to see, they had to show it to 6 the client, there is a procedure under the order that would 7 allow Plaintiffs to bring that matter to the Court's 8 attention and request relief. 9 So, there's nothing in this order that would stop 10 them from getting to the things that they wanted, at least as 11 far as they've stated here today. And as far as the Court's 12 comment, one part of our protected designation -- or 13 definition -- 14 THE COURT: The "financial" and "operational?" 15 MR. SCHWIND: Well, no, with any -- protected 16 information also means any information disclosed in this 17 litigation that has not been released to the public 18 previously. Again, Starr and AIG is a very different case, 19 but that sentence came from that protective order. So, we 20 didn't -- we weren't just trying to come up with something 21 that hadn't been -- we're not here to -- 22 THE COURT: I'm just telling you how it struck me. 23 MR. SCHWIND: Yes, Your Honor. But -- and I'm not 24 here to argue with the Court. I just want the Court to know 25 we did not --</p>

37	<p>1 THE COURT: No, no, that's okay. Go ahead.</p> <p>2 MR. SCHWIND: We did not just come up with that</p> <p>3 with no basis. And, again, just pointing out that this is --</p> <p>4 this case is at a very different posture from the ordinary</p> <p>5 case where we have a motion for protective order or -- I'm</p> <p>6 sorry, where we have a confidentiality order or a protective</p> <p>7 order. And we're talking about whether or not as far as the</p> <p>8 merits and going forward with the trial what should happen.</p> <p>9 We do, again, think that's important.</p> <p>10 THE COURT: Well, I appreciate it. And, truly,</p> <p>11 I -- if I've made a mistake, I expect you to straighten me</p> <p>12 out and I would appreciate your straightening me out, but we</p> <p>13 have -- there are some parts of the order that favor the</p> <p>14 Plaintiff, I agree, and other parts, I disagree. So, I'll --</p> <p>15 no one will be totally happy with what they say, but I</p> <p>16 believe what I'm doing will be -- what you see will be fair</p> <p>17 and appropriate and in the best interest of justice. And if</p> <p>18 you all run into a problem, I'm sure you're going to let me</p> <p>19 know.</p> <p>20 MR. SCHWIND: Thank you, Your Honor.</p> <p>21 THE COURT: Thank you, Mr. Schwind.</p> <p>22 MR. COOPER: Your Honor, at the risk of belaboring</p> <p>23 one more --</p> <p>24 THE COURT: No, no, no, I'm here for as long as you</p> <p>25 want me to sit here.</p>	39	<p>1 MR. COOPER: Okay.</p> <p>2 THE COURT: I think we're very clear. I think</p> <p>3 what's clear is if Tom, Dick or Harry made the FOIA</p> <p>4 application, Treasury would -- or, excuse me -- well, it</p> <p>5 depends, I guess, to which agency they were making the</p> <p>6 application. But FHFA would indicate what documents would be</p> <p>7 available or the number of documents, how much it was going</p> <p>8 to cost to have the documents reproduced and they wouldn't be</p> <p>9 seeing any privileged document of any sort --</p> <p>10 MR. COOPER: Of course not.</p> <p>11 THE COURT: -- or any sensitive -- I mean, I don't</p> <p>12 think that the Government or the agency is going to give to</p> <p>13 anyone, who would file a FOIA request, sensitive material, I</p> <p>14 think that's a guarantee.</p> <p>15 MR. COOPER: I do, too, Your Honor. And, so,</p> <p>16 obviously, if it would be something that under FOIA, because</p> <p>17 of these considerations, they would be entitled not to</p> <p>18 produce to the public, then I don't think that's in dispute.</p> <p>19 That's something they can designate as protected here in this</p> <p>20 proceeding, and we're not going to challenge. But if it --</p> <p>21 or we may -- we probably aren't going to challenge. But my</p> <p>22 point is that, surely, if it's something that under the FOIA</p> <p>23 they would have no basis to withhold it, legitimate under</p> <p>24 that law, then they ought not be able to stamp it as</p> <p>25 protected here or -- they will stamp it as protected, but --</p>
38	<p>1 MR. COOPER: Thank you very much. It deals with</p> <p>2 the colloquy you've just had with my friend for the</p> <p>3 Government on the issue of FOIA. And I just want to make</p> <p>4 sure there's clarification here, or perhaps that I am</p> <p>5 corrected. But the issue really isn't so much, it seems to</p> <p>6 me, whether or not we would be entitled to a document if the</p> <p>7 Government, after discovery's been produced to us, releases</p> <p>8 that document to the public in a FOIA request. Then, of</p> <p>9 course, it's no longer nonpublic and it would be -- that</p> <p>10 would be the epitome of silliness for them to suggest that at</p> <p>11 that point we can't use it.</p> <p>12 The real question, though, is in the standard that</p> <p>13 they apply and that this Court will ultimately apply if</p> <p>14 there's any dispute over a particular document, whether it is</p> <p>15 genuinely legitimately warranted protection, whether or not</p> <p>16 we should be entitled to receive, without restrictions,</p> <p>17 anything that any Tom, Dick or Harry in the United States</p> <p>18 made an FOIA request for and would be entitled under that law</p> <p>19 to receive. Surely, if any member of the public -- if we ask</p> <p>20 for the same document as FOIA requesters, we'd be entitled</p> <p>21 under that law to receive it and, surely, we should be</p> <p>22 entitled to receive that in this process without the</p> <p>23 restraints of the protective order. That's -- I just wanted</p> <p>24 to make sure that --</p> <p>25 THE COURT: No, we're on the same page.</p>	40	<p>1 THE COURT: But they will withdraw it where</p> <p>2 appropriate.</p> <p>3 MR. COOPER: But once we get into, you know, a back</p> <p>4 and forth on this -- and, certainly, if we bring the issue to</p> <p>5 you, if we'd be entitled to it as FOIA requesters, we surely</p> <p>6 are entitled to it as litigants in this Court.</p> <p>7 THE COURT: That seems fairly straightforward.</p> <p>8 MR. COOPER: Thank you, Your Honor.</p> <p>9 MR. SCHWIND: Your Honor, I just want to make sure</p> <p>10 -- because counsel brought up FOIA. We do not believe the</p> <p>11 FOIA standard has any place in the protective order.</p> <p>12 Plaintiffs have proposed that in paragraph 2.</p> <p>13 THE COURT: Two, yes.</p> <p>14 MR. SCHWIND: If the Court wants to modify</p> <p>15 Plaintiffs' statement -- I mean, right now, Plaintiffs say</p> <p>16 that protective information does not include material that is</p> <p>17 available to the public under FOIA.</p> <p>18 THE COURT: Or any other --</p> <p>19 MR. SCHWIND: Or any other law.</p> <p>20 THE COURT: Yes.</p> <p>21 MR. SCHWIND: Well, we do not think it's</p> <p>22 appropriate to essentially add the body of FOIA law, to</p> <p>23 essentially import it into this protective order or require</p> <p>24 the United States or whatever side is producing documents --</p> <p>25 of course, FOIA only applies to the Government, right; so, it</p>

41	<p>1 would only apply to us at least with respect to FOIA -- to</p> <p>2 bring that into the order and essentially ask us to conduct a</p> <p>3 FOIA examination of every document.</p> <p>4 THE COURT: No, we're not doing that. In fact, the</p> <p>5 applicable law appears in the protective order that you'll be</p> <p>6 seeing, but FOIA was not included. If they're entitled to</p> <p>7 receive documents under law, they're going to get it. I</p> <p>8 mean, that's just the way it goes. And then you can make a</p> <p>9 determination whether or not you're going to remove the --</p> <p>10 whether the designation of protected document or protected</p> <p>11 information should be maintained.</p> <p>12 And then you'll bring the -- and I want the -- when</p> <p>13 you have discussions, I'm assuming it's not a -- if it's</p> <p>14 possible, I'm assuming it will actually happen with the</p> <p>15 nature of this case and with the number -- I mean, it's</p> <p>16 obviously voluminous documents. So, I'm going to see at</p> <p>17 least one document in dispute, if not more.</p> <p>18 Please make sure these discussions are meaningful</p> <p>19 and not just "I want it, you can't have it" or rather, it</p> <p>20 should -- you know, "this shouldn't be marked protected;</p> <p>21 well, tough, it's going to stay that way." You know, I want</p> <p>22 you to really explain your reasoning so that when I'm reading</p> <p>23 motions, I am -- we have a thorough give-and-take or -- and</p> <p>24 all the reasoning is set forth. In fact, we may eventually</p> <p>25 have -- you know, I shouldn't try to predict the future, but</p>	43	<p>1 MR. SCHWIND: Thank you, Your Honor.</p> <p>2 THE COURT: Mr. Cooper, anything else from you or</p> <p>3 your colleagues?</p> <p>4 MR. COOPER: No, Your Honor, thank you very much.</p> <p>5 THE COURT: Last chance for the Government, Mr.</p> <p>6 Dintzer.</p> <p>7 MR. DINTZER: No, thank you, Your Honor.</p> <p>8 THE COURT: Very good. Counsel, thank you very</p> <p>9 much.</p> <p>10 MR. COOPER: Thank you, Your Honor.</p> <p>11 (Whereupon, at 2:57 p.m., the hearing was</p> <p>12 adjourned.)</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
42	<p>1 it would not surprise me if we have to have a closed court</p> <p>2 session where we're actually going through some documents and</p> <p>3 having argument. I hope not. I hope not. It might be far</p> <p>4 more straightforward than that. But --</p> <p>5 MR. SCHWIND: Right, Your Honor. And we don't have</p> <p>6 any dispute with that. But we do, again, dispute this idea</p> <p>7 that protected material does not include material that might</p> <p>8 be theoretically available under some other law. If it's</p> <p>9 been made available to the public under some other law,</p> <p>10 that's one thing. But to bring in the entire body of laws</p> <p>11 out there that could allow, if someone requested it, the</p> <p>12 disclosure of a certain document, we think that is not the</p> <p>13 purpose of this protective order.</p> <p>14 THE COURT: We're talking about the applicable law</p> <p>15 of this Court. I mean, and, obviously, we're not talking</p> <p>16 about every statute on the books.</p> <p>17 MR. SCHWIND: Yes, Your Honor.</p> <p>18 THE COURT: So, it would be that would pertain to</p> <p>19 these proceedings.</p> <p>20 MR. SCHWIND: Thank you.</p> <p>21 THE COURT: And I would hope all counsel would</p> <p>22 understand that and I -- I hope the order that I prepare will</p> <p>23 be clear. And as I said, if it's not, I'm sure you won't be</p> <p>24 shy about letting me know and I'd welcome you letting me</p> <p>25 know.</p>	44	<p>1 CERTIFICATE OF TRANSCRIBER</p> <p>2</p> <p>3 I, Elizabeth M. Farrell, court-approved</p> <p>4 transcriber, certify that the foregoing is a correct</p> <p>5 transcript from the official electronic sound recording of</p> <p>6 the proceedings in the above-titled matter.</p> <p>7</p> <p>8</p> <p>9 DATE: 7/17/14 S/Elizabeth M. Farrell</p> <p>10 ELIZABETH M. FARRELL, CERT</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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