

# EXHIBIT A

SUSMAN GODFREY L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP  
32ND FLOOR  
1301 AVENUE OF THE AMERICAS  
NEW YORK, NEW YORK 10019-6023  
(212) 336-8330  
FAX (212) 336-8340  
WWW.SUSMANGODFREY.COM

SUITE 5100  
1000 LOUISIANA STREET  
HOUSTON, TEXAS 77002-5096  
(713) 651-9366

SUITE 1400  
1900 AVENUE OF THE STARS  
LOS ANGELES, CALIFORNIA 90067-6029  
(310) 789-3100

SUITE 3000  
401 UNION STREET  
SEATTLE, WASHINGTON 98101-2683  
(206) 516-3880

GENG CHEN  
DIRECT DIAL (212) 729-2008

E-MAIL GCHEN@SUSMANGODFREY.COM

February 21, 2023

VIA FIRST CLASS MAIL

Wayne Strickland  
FOIA Officer  
National Technical Information Service  
5301 Shawnee Road  
Alexandria, VA 22312

Dear Mr. Strickland:

This is a request under the Freedom of Information Act. I request that a copy of the document(s) described in the attached exhibit (Exhibit A) be provided to me. In order to help determine fees, you should know that I am an attorney at the law firm Susman Godfrey L.L.P. and this request relates to pending litigation. I am willing to pay fees up to \$5,000. If you expect the fees will exceed this, please contact me before proceeding.

I have also emailed a copy of this request to you and your colleague Linda Swan. We understand that Ms. Swan is involved in the NTIS' certification program for the LADMF.

If you need to discuss this request, I can be reached at (212) 729-2008 or gchen@susmangodfrey.com. Thank you for your consideration of my request.

Sincerely,



Geng Chen

cc: Wayne Strickland (wstrickland@ntis.gov)  
Linda Swan (lswan@ntis.gov)

**EXHIBIT A**

This request seeks copies of the Social Security Death Master File (“SSDMF”) and Limited Access Death Master File (“LADMF”) that were licensed to certain life insurance companies and third-party contractors that performed work for these life insurance companies (collectively, the “Life Insurers”), as well as documents showing the receipt of the SSDMF or LADMF by these Life Insurers. Unless otherwise indicated, this request covers the time period from January 1, 2000 to June 14, 2012 (“Relevant Period”).

The Life Insurers referenced in this request are as follows:

1. **AXA Group:** AXA Financial, Inc., AXA Equitable Financial Services, LLC, AXA Equitable Life Insurance Company, and each of their predecessors, affiliates, subsidiaries, parent companies, and other entities controlled by or under common control with them.

- a. We understand that an entity named “EQUITABLE LIFE & CASUALTY INSURANCE COMPANY” was or is an NTIS licensee.
- b. Entities within the AXA Group may also appear as AXA Equitable Life Insurance Co., AXA Equitable Life Ins Co., Equitable Financial Life Ins Co, Equitable, The Equitable, Mony Life Insurance Co, and Mony Life Ins Co.

2. **Genworth Group:** Genworth Financial, Inc. and Genworth Life Insurance of New York, and each of their predecessors, affiliates, subsidiaries, parent companies, and other entities controlled by or under common control with them.

- a. We understand that an entity named “GENWORTH FINANCIAL” was or is an NTIS licensee.

- b. Entities within the Genworth Group may also appear as Genworth Life Insurance Co, Genworth Life Ins Co of NY, Genworth Life Insurance Co of NY, Genworth Life & Ann Ins Co, and Genworth Life & Health Ins Now Sun Life & Health.

3. **Guardian Group:** The Guardian Life Insurance Company of America and The Guardian Insurance & Annuity Company, Inc., and each of their predecessors, affiliates, subsidiaries, parent companies, and other entities controlled by or under common control with them.

- a. Entities within the Guardian Group may also appear as Guardian Life Insurance Co. and Guardian Insurance & Annuity Co.

4. **John Hancock Group:** John Hancock Life Insurance Company (U.S.A.), John Hancock Life Insurance Company of New York, and John Hancock Life & Health Insurance Company, and each of their predecessors, affiliates, subsidiaries, parent companies, and other entities controlled by or under common control with them.

- a. We understand that an entity named “JOHN HANCOCK LIFE INSURANCE COMPANY USA” was or is an NTIS licensee.
- b. Entities within the John Hancock Group may also appear as John Hancock, John Hancock Life Ins Co USA, JHUSA, JHUSA John Hancock Life Ins Co USA, John Hancock Life Ins Co of NY, and JHNY.

5. **MassMutual Group:** Massachusetts Mutual Life Insurance Company, and each of its predecessors, affiliates, subsidiaries, parent companies, and other entities controlled by or under common control with it.

- a. We understand that entities named “Massachusetts Mutual Life Insurance Company,” “C.M. Life Insurance Company,” “MML Bay State Life Insurance Company,” and “MML Investors Services LLC” were or are NTIS licensees.
- b. Entities within the Mass Mutual Group may also appear as Massachusetts Life Insurance Co, Massachusetts Mutual Life Ins Co, and Massachusetts Mutual Life Insurance Comp.
- c. Relevant individuals affiliated with the Mass Mutual Group include Phil Garvey and Carla Dean.

6. **MetLife Group:** MetLife, Inc. and Metropolitan Life Insurance Company, and each of their predecessors, affiliates, subsidiaries, parent companies, and other entities controlled by or under control with them.

- a. We understand that an entity named “METLIFE” was or is an NTIS licensee.
- b. Entities within the MetLife Group may also appear as Metropolitan Life Insurance Co, MetLife Ins Co of CT, MetLife Ins Co USA, MetLife Investors USA Insurance Co.

7. **New York Life Group:** New York Life Insurance Company and New York Life Insurance and Annuity Corporation, and each of their predecessors, affiliates, subsidiaries, parent companies, and other entities controlled by or under common control with them.

- a. Entities within the New York Life Group may also appear as New York Life Insurance Co and New York Life Insurance & Annuity Co.

8. **Prudential Group:** Prudential Financial, Inc., The Prudential Insurance Company of America, and Prudential Insurance Agency, LLC, and each of their predecessors, affiliates, subsidiaries, parent companies, and other entities controlled by or under common control with them.

- a. Entities within Prudential Group may also appear as Prudential Insurance Co, Prudential Insurance Company, Prudential Insurance Co of America, Prudential Ins. Co et al, Pruco Life Insurance Co, Pruco Life Insurance Co of New Jersey, Pruco AX Life Insurance Co, Prudential Annuities Life Assurance Corp, Prudential Annuities Life, Prudential Retirement Insurance & Annuity Co, Prudential Retirement Ins & Annuity Co, and American Skandia Inc.

9. **TIAA-CREF Group:** Teachers Insurance and Annuity Association of America and TIAA-CREF Life Insurance Company, and each of their predecessors, affiliates, subsidiaries, parent companies, and other entities controlled by or under common control with them.

- a. Entities within TIAA-CREF Group may also appear as Teachers Insurance & Annuity of America and Teachers Insurance and Annuity Association.

10. **Third-Party Contractor Group:** TransUnion Corp., LexisNexis, Experian, Pension Benefit Information, Berwyn Group, Equifax, FastData or Fast Data, MIB Solutions, Inc., and each of their predecessors, affiliates, subsidiaries, parent companies, and other entities controlled by or under common control with them.

- a. We understand that entities named “TransUnion LLC,” “TransUnion Risk and Alternative Data Solutions, Inc.,” “LexisNexis Risk Data Retrieval Services LLC,” “Experian Health, Inc.,” “Experian Marketing Services,”

“Pension Benefit Information, LLC,” “The Berwyn Group,” “Equifax Inc.,” “FAST DATA SERVICES,” and “MIB SOLUTIONS INC,” were or are NTIS licensees.

- b. Entities within the Third-Party Contractor Group may also appear as ChoicePoint (a service of LexisNexis), Accurint (a service of LexisNexis), FirstData or First Data (name used by Fast Data), FirstPursuit or First Pursuit (name used by Fast Data).
- c. Relevant individuals affiliated with the Third-Party Contractor Group include Joseph Giannusa, Meredith Sidewater, Susan S. McDonald, Frank Chen, Susan Sullivan, Michele LaManna, Matthew Hillgard, Lisa Rupiper, Ryan McGregor, Carol Van Pelt, Brian Parry, Felix Federowicz, Lewis Stone, Luciana Conte, Barbara Benz, and J. Michael de Janes.

Specifically, we request the following document(s) under the Freedom of Information Act:

1. Documents identifying all individuals and entities with licenses to, who received, or who had access to the SSDMF and/or LADMF for each year during the Relevant Period.
2. Documents showing which Life Insurers were licensed to receive the SSDMF and/or LADMF during the Relevant Period (“Life Insurer Licensees”).
3. Documents showing the dates during which each Life Insurer Licensee was licensed to receive the SSDMF and/or LADMF during the Relevant Period.
4. Documents showing that the Life Insurer Licensees were provided, given access to, or received the SSDMF and/or LADMF during the Relevant Period. For any time period in which the SSDMF and/or LADMF were provided or made accessible on physical media (*e.g.*, compact

disc), this request seeks documents such as correspondence between NTIS and a Life Insurer Licensee enclosing the SSDMF and/or LADMF. For any time period in which the SSDMF and/or LADMF were provided or made accessible electronically, this request seeks documents such as emails between NTIS and a Life Insurer Licensee concerning the availability of the SSDMF and/or LADMF for download or download activity reports indicating that a Life Insurer Licensee actually downloaded the SSDMF and/or LADMF.

5. Documents showing the NTIS's policies and practices for licensing, providing, or making accessible the SSDMF and/or LADMF, including documents describing the update process, during the Relevant Period.

6. All versions of the SSDMF and/or LADMF that were licensed, provided, or made accessible to each Life Insurer Licensee from January 1, 2000 to the present.

7. All versions of the SSDMF and/or LADMF that existed as of December 31 for each year from 2000 to 2022, inclusive.



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A REGISTERED LIMITED LIABILITY PARTNERSHIP  
32ND FLOOR  
1301 AVENUE OF THE AMERICAS  
NEW YORK, NEW YORK 10019-6023

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02 7H  
0001350305 \$ 000.84<sup>0</sup>  
FEB 21 2023

**Freedom of Information Request**

**National Technical Information Service**  
**5301 Shawnee Road**  
**Alexandria, VA 22312**