

# **EXHIBIT B**

# HUSCH BLACKWELL

Gregg N. Sofer  
Partner

111 Congress Avenue, Suite 1400  
Austin, TX 78701  
Direct: 202.378.2383  
Fax: 512.479.1101  
gregg.sofer@huschblackwell.com

September 27, 2023

## VIA E-MAIL AND FOIA.GOV

Grace Agyekum  
Department of Commerce  
Bureau of Industry and Security  
Office of Administration  
Mail Stop H6622  
1401 Constitution Avenue, N.W.  
Washington, DC 20230  
E-Mail: [grace.agyekum@bis.doc.gov](mailto:grace.agyekum@bis.doc.gov)

Re: Freedom of Information Act Request

Dear Ms. Agyekum:

Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, we request a copy of the final proposal and any accompanying attachments, exhibits, or appendices that were submitted to the End-User Review Committee (“ERC”) in support of the decision to place Yangtze Memory Technologies Corporation (Japan) (“YMTJ”) on the BIS Entity List. We are seeking these records from BIS both in its capacity as Chair of the ERC and in its capacity as an individual member of the ERC.

FOIA requires this request to be acted upon within twenty (20) working days of receipt. Please furnish the responsive documents immediately as they become available. Please advise us as soon as possible if you determine that there is no document responsive to the request or if there will be a delay in responding.

If you determine that the record or portions of the record are exempt from disclosure, please provide a Vaughn index containing a detailed justification of the grounds for nondisclosure of each withheld portion of requested material is required. *See Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), *cert. denied*, 415 U.S. 977 (1974).

We are willing to pay reasonable standard search and duplication costs necessary to respond to this request. Please advise me before incurring these costs if you expect them to exceed \$5,000.

# HUSCH BLACKWELL

Grace Agyekum  
September 27, 2023  
Page 2

Thank you for your assistance in processing this request. If you are not the custodian of these records, please forward this request to the custodian. Please call me if you have any questions.

Very truly yours,

HUSCH BLACKWELL LLP



Gregg N. Sofer

cc: Opher Shweiki, [oshweiki@doc.gov](mailto:oshweiki@doc.gov)