## Exhibit 23

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## McDougall, Michael

From: McDougall, Michael

**Sent:** Friday, August 30, 2019 1:01 PM

To: '^FOIA Public Liaison'

Subject: FOIA Appeal - SSA-2017-001087, SSA-2019-002259 - Payment Authorization

Attachments: SSA FOIA Payment Authorization.pdf

Attached please find payment authorization for the processing fees raised in your August 19th letter. Under separate cover, we are appealing the agency's determination that our request is not program-related but are authorizing payment in order to avoid any further delay in processing this three-year-old FOIA request. This payment authorization should not, therefore, be construed as a waiver of our right to appeal the agency's latest determination.

Sincerely,

Mike McDougall

## Michael J McDougall AKIN GUMP STRAUSS HAUER & FELD LLP

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