FEDERAL RESERVE BANK *of* CHICAGO

230 SOUTH LASALLE STREET
CHICAGO, ILLINOIS 60604-1413
chicagofed.org

July 16, 2026

VIA FED EZFILE TRANSMISSION ONLY
Michael Nonaka
Partner
Covington & Burling LLP
850 10th St. NW
Washington, DC 20001

Dear Michael,

This is in connection with the application filed with Federal Reserve Bank of Chicago ("Reserve Bank") pursuant to Section 3(a)(1) of the Bank Holding Company Act by Enova International, Inc., Chicago, Illinois ("Holding Company") to become a bank holding company by acquiring Grasshopper Bancorp, Inc. ("Grasshopper") and thereby indirectly acquiring Grasshopper Bank, National Association ("Grasshopper Bank"), both of New York, New York through the merger with Enova Interim Bank, N.A., South Jordan, Utah, ("Resulting Bank") received on January 16, 2026 (the "Application").

In connection with the processing of the aforementioned application, our review has revealed the need for additional information. Please see the attached addendum and upload written responses and the requested documentation to the following observations and questions by close of business **July 28, 2026** via FedEZFile. Any information for which you desire confidential treatment should be so labeled and separately bound in accordance with the Board's rules regarding confidential treatment of information at12 C.F.R. § 261.17.

If you have any questions, please contact Jennifer Grandy at (312) 343-2871 or jennifer.grandy@chi.frb.org or me at (312) 322-8320 or chameen.d.letourneau@chi.frb.org.

Sincerely,

E-SIGNED by Chameen Letourneau
on 2026-07-16 17:12:29 GMT

Chameen Letourneau
Supervision Manager
Mergers & Acquisitions

Request for Additional Information

Public Volume

A. Refence is made to the responses provided in the Public Volume of the Interagency Bank Merger Act Application dated January 16, 2026 ("BMA Application") and the Public Volume of the Substantial Asset Change Application also dated January 16, 2026 ("Substantial Change Application").

   1. Discuss the status of the proposed closure of Grasshopper Bank's branch in Dearborn, Michigan. The response provided in Question 13(b) states that, "[w]hile Target Bank currently maintains a branch in Dearborn, Michigan that it acquired through the Auto Club Trust merger, the branch has no cash, vaults, or tellers. Unrelated to the Mergers, the Target Bank is in the process of closing this branch."

B. Discuss the status of whether Grasshopper Bank's main office and branch in New York, New York will remain open. Please clarify the discrepancies noted below and clarify whether the Grasshopper Bank's main office and branch in New York, New York, will close post consummation of the proposed Mergers.

   1. The response provided in Question 13 (b) states that, "[t]he resulting Bank does not ultimately intend to operate the Target Bank's main office in New York, New York as a branch. However, if the Target Bank's office in New York were not closed immediately in connection with the Bank Merger, New York may be a host state for purposes of R-N." The response provided in Question 13(g) states that, "[t]he resulting Bank does not ultimately intend to operate any offices of the Target Bank as branches. However, if the Target Bank's main office in New York, New York is not closed immediately in connection with the Bank Merger, the resulting Bank is authorized to retain that office as a branch. The response provided to Question 14 states that, "[t]he resulting Bank intends to close the main office of the Target Bank, 261 5th Ave Ste 610, New York, NY 10016." The response provided to Question 7 in the Substantial Change Application states, "[f]ollowing the Mergers, the resulting Bank will have no branches aside from its main office (which will be the main office of Enova Interim Bank)."

C. Discuss whether any other regulatory approvals are required for Resulting Bank beyond the application for a national bank and the application with the state of Utah. The response to Question 13 (e) states that, "Enova Interim Bank is only an interim national bank. However, the Target Bank is currently well-capitalized, and the resultant bank intends to be well-capitalized and well-managed following consummation of the Proposed Transactions."