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April 21, 2026

Chameen Letourneau
Supervision Manager, Mergers & Acquisitions
Federal Reserve Bank of Chicago
230 South LaSalle Street
Chicago, Illinois 60604

**Re: Response to Federal Reserve Bank of Chicago Letter dated April 2, 2026,
Requesting Additional Information on Applications and Related Filings
Submitted by Enova International, Inc.**

Dear Ms. Letourneau:

We write in response to your letter dated April 2, 2026, regarding the applications (the “Applications”) submitted on behalf of Enova International, Inc., Chicago, Illinois (“Enova” or the “Applicant”), for prior approval of the Board of Governors of the Federal Reserve System (the “Board”) pursuant to Section 3(a)(1) of the Bank Holding Company Act of 1956, as amended, and Section 225.15 of Regulation Y, to become a bank holding company by acquiring Grasshopper Bancorp, Inc. (“Grasshopper”) and Grasshopper Bank, National Association, (“Grasshopper Bank”).

Your request letter included a list of public and confidential requests. With this response, we have included the following four volumes responding to your requests: (1) Public Volume with Public Exhibits; (2) Confidential Volume with Confidential Exhibits; (3) Interagency Biographical and Financial Report (“IBFR”) Volume with Confidential Exhibits; and (4) Confidential Policy Volume with Confidential Exhibits. The Public, Confidential, and IBFR Volumes list applicable requests and include corresponding narrative responses and exhibits.

* * *

Enova requests confidential treatment of the Confidential Volume, Confidential Exhibits, Confidential Interagency Biographical and Financial Report Volume, Confidential Policy Volume, and all information contained therein (collectively, the “Confidential Information”). The Confidential Information consists of highly sensitive business and regulatory information that is proprietary in nature and not available to the public. Disclosure of any Confidential Information to the public, to a federal or state government agency, or to any third party could result in substantial harm to the competitive position of Enova and its affiliates. In particular, the

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Confidential Information includes confidential commercial and financial information that relates to the business, personnel, and financial affairs of Enova and its affiliates, the disclosure of which could provide competitors with direct knowledge of the business plans and activities of Enova and its affiliates, to the material detriment of their competitive position.

The Confidential Information includes confidential commercial or financial information, furnished in confidence, that is customarily and actually treated as private for purposes of Exemption 4 of the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552(b)(4). We are providing this information on the basis of the assurances of privacy accorded to such information established in 12 C.F.R. § 261.15(b)(4). *See Food Mktg. Inst. v. Argus Leader Media*, 588 U.S. 427, 440 (2019) (“[W]here commercial or financial information is both customarily and actually treated as private by its owner and provided to the government under an assurance of privacy, the information is ‘confidential’ within the meaning of [FOIA] Exemption 4.”). The Confidential Information also includes financial records containing sensitive personal information, furnished in confidence, the disclosure of which would constitute a clearly unwarranted invasion of the personal privacy of individuals associated with Enova for purposes of FOIA Exemption 6. *See* 12 C.F.R. § 261.15(b)(6).

The Confidential Information also contains information that is confidential pursuant to Exemption 8 of the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552(b)(8), implemented at 12 C.F.R. § 261.15(a)(8).

The Confidential Information accordingly is exempt from public disclosure under FOIA and Federal Reserve implementing regulations. We respectfully request that we be notified in advance and given an opportunity to be heard if it is proposed that the Confidential Information be made public. *See* Executive Order 12,600 (June 23, 1987).

In addition, we request, pursuant to FOIA and applicable Federal Reserve regulations and for reasons including those set forth above, that any memoranda, notes, or other writings of any kind whatsoever made by an employee, agent, or any person under the control of the Federal Reserve (or any other governmental agency) that incorporate, include, or relate to any of the matters referred to in the Confidential Information (i) furnished by Enova or its respective employees or agents to the Federal Reserve (or any other governmental agency) or (ii) referred to in any conference, meeting, telephone conversation or interview between (a) employees, former employees, representatives, agents or counsel of Enova and (b) employees, agents or any persons under the control of the Federal Reserve, be maintained in confidence, not be made part of any public record, and not be disclosed to any person.

Finally, the Confidential Information includes information that is protected by the attorney-client privilege and other applicable privileges and protections. Enova’s disclosure of this information to the Federal Reserve does not waive, destroy, or otherwise affect applicability of any such protections. 12 U.S.C. § 1828(x).

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If you have any questions with respect to the Application, please do not hesitate to contact me at (202) 662-5727 or mnonaka@cov.com.

Sincerely,



Michael Nonaka

cc: Steven Cunningham, Chief Executive Officer, Enova International, Inc.
Mike Butler, Chief Executive Officer, Grasshopper Bank
Jennifer Grandy, Senior CRSB Examiner – Mergers and Acquisitions, Federal Reserve Bank of Chicago
Rachel Grundmeier, Federal Reserve Bank of Chicago
Colette Fried, Assistant Vice President, Mergers, Acquisitions, and Enforcement, Federal Reserve Bank of Chicago
Naima A. Jefferson, Board of Governors of the Federal Reserve System
Patrick M. Grant, Board of Governors of the Federal Reserve System
David E. Cohen, Board of Governors of the Federal Reserve System