



Office of the Secretary

United States of America  
FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

July 24, 2014

Aidan Synnott, Esquire  
Paul, Weiss, Rifkind, Wharton & Garrison LLP  
1285 Avenue of the Americas  
New York, NY 10019

Re: *In the Matter of Fidelity National Financial, Inc.*, FTC Docket No. C-4425

Dear Mr. Synnott:

This letter responds to the Amended Application for Approval of Proposed Divestiture of the Portland Title Agency Interest and the Polk County Title Plant Assets to Old Republic Title Company of Oregon (“Amended Application”), which Fidelity National Financial, Inc., filed on May 21, 2014. The Amended Application requests that the Federal Trade Commission approve Fidelity’s proposed divestitures pursuant to the order in this matter. The Amended Application was placed on the public record for comments until June 12, 2014, and no substantive comments were received.

After consideration of the proposed divestitures as set forth in Fidelity’s Amended Application and supplemental documents, as well as other available information, the Commission has determined to approve the proposed divestitures. In according its approval, the Commission has relied upon the information submitted and representations made in connection with Fidelity’s Amended Application and has assumed them to be accurate and complete.

By direction of the Commission, Commissioner Wright dissenting.

Donald S. Clark  
Secretary

cc: Daniel Wold, SVP, General Counsel & Secretary  
Old Republic National Title Insurance Company  
400 Second Avenue South  
Minneapolis, MN 55401