

EXHIBIT E

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In the matter of the application of

U.S. BANK NATIONAL ASSOCIATION, THE BANK OF NEW YORK MELLON, THE BANK OF NEW YORK MELLON TRUST COMPANY, N.A., WILMINGTON TRUST, NATIONAL ASSOCIATION, LAW DEBENTURE TRUST COMPANY OF NEW YORK, WELLS FARGO BANK, NATIONAL ASSOCIATION, HSBC BANK USA, N.A., and DEUTSCHE BANK NATIONAL TRUST COMPANY (as Trustees under various Pooling and Servicing Agreements and Indenture Trustees under various Indentures), AEGON USA Investment Management, LLC (intervenor), Bayerische Landesbank (intervenor), BlackRock Financial Management, Inc. (intervenor), Cascade Investment, LLC (intervenor), the Federal Home Loan Bank of Atlanta (intervenor), the Federal Home Loan Mortgage Corporation (Freddie Mac) (intervenor), the Federal National Mortgage Association (Fannie Mae) (intervenor), Goldman Sachs Asset Management L.P. (intervenor), Voya Investment Management LLC (f/k/a ING Investment LLC) (intervenor), Invesco Advisers, Inc. (intervenor), Kore Advisors, L.P. (intervenor), Landesbank Baden-Wuerttemberg (intervenor), Metropolitan Life Insurance Company (intervenor), Pacific Investment Management Company LLC (intervenor), Sealink Funding Limited (intervenor), Teachers Insurance and Annuity Association of America (intervenor), The Prudential Insurance Company of America (intervenor), the TCW Group, Inc. (intervenor), Thrivent Financial for Lutherans (intervenor), and Western Asset Management Company (intervenor),

Petitioners,

-against-

FEDERAL HOME LOAN BANK OF BOSTON (intervenor), TRIAXX PRIME CDO 2006-1, LTD., TRIAXX PRIME CDO 2006-2, LTD., TRIAXX PRIME CDO 2007-1, LTD. (intervenor), QVT FUND V LP, QVT FUND IV LP, QUINTESSENCE FUND L.P., QVT FINANCIAL LP (intervenor), BREVAN HOWARD CREDIT CATALYSTS MASTER FUND LIMITED AND BREVAN HOWARD CREDIT VALUE MASTER FUND LIMITED (intervenor), THE NATIONAL CREDIT UNION ADMINISTRATION BOARD AS LIQUIDATING AGENT FOR U.S. CENTRAL FEDERAL CREDIT UNION, WESTERN CORPORATE FEDERAL CREDIT UNION, MEMBERS UNITED CORPORATE FEDERAL CREDIT UNION, SOUTHWEST CORPORATE FEDERAL CREDIT UNION, AND CONSTITUTION CORPORATE FEDERAL CREDIT UNION (intervenor), and AMBAC ASSURANCE CORPORATION, AND THE SEGREGATED ACCOUNT OF AMBAC ASSURANCE CORPORATION (intervenor),

Respondents,

for an order, pursuant to CPLR § 7701, seeking judicial instruction, and approval of a proposed settlement.

Index No. 652382/2014

**TRUSTEES' RESPONSE TO FIRST SET
OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 3122 of the New York Civil Practice Law and Rules (“CPLR”), the Trustees respond to the First Set of Requests for Production of Documents, dated November 7, 2014 (the “Request for Production”), directed to the Trustees on behalf of certain objectors (the “Objectors”), as follows:¹

PRELIMINARY STATEMENT

As the Trustees stated in their letter to the Objectors dated November 21, 2014 (the “November 21, 2014 Letter”), the Trustees will provide the following documents and information concerning Accepting Trusts in which the Objectors have a beneficial ownership interest (the “Subject Trusts”) as the Trustees’ complete response to the Request for Production:

1. documents considered by each Trustee’s committee or other relevant decision maker(s) when determining whether to accept the Settlement;
2. documents provided by the Trustees to Jeremy E. Reifsnyder, Boston Portfolio Advisors, Inc.; Faten Sabry, PhD, National Economic Research Associates, Inc.; or Daniel R. Fischel, Compass Lexecon, in connection with their respective evaluations of the Settlement;
3. identification of witnesses with knowledge of information that is material and necessary to the subject matter of the proceeding;
4. unredacted versions of the expert reports of (i) Mr. Reifsnyder, dated July 12, 2014; (ii) Dr. Sabry, dated July 17, 2014; (iii) Mr. Fischel, dated July 17, 2014; and (iv) Mr. Fischel, dated July 26, 2014 (collectively, the “Expert Reports”); and
5. the pooling and serving agreement or the indenture and sale and servicing agreement, and the prospectus supplement and/or private placement memorandum.

As the Trustees explained during the November 13, 2014 meet and confer and in the November 21, 2014 Letter, consistent with the scope of this special proceeding and the applicable standard of judicial review, the only arguably relevant documents are those responsive to the first of these five categories, *i.e.*, documents considered by each Trustee’s committee or other relevant decision maker(s) when determining whether to accept the Settlement. Nonetheless, the Trustees intend to produce documents and information responsive to the remaining categories (*i.e.*, numbers 2 through 5 above) in an effort to narrow potential discovery disputes, even though they maintain such discovery is objectionable.

In a further effort to avoid unnecessary delay and to narrow any issues that may be submitted to the Court for resolution, the Trustees also agreed to identify in their responses to the Request for Production instances where the Trustees have a good faith belief that there is no responsive information to a particular request in their respective possession, custody, or control, subject to and without waiving any objection asserted in response to the relevant request. The

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the First Amended Petition.

absence of such a statement on behalf of any Trustee does not mean that such Trustee has in its possession, custody, or control documents responsive to the relevant request.

The Trustees' responses and objections herein are based upon such information and documents presently available to and specifically known to the respective Trustees, and are made without prejudice to and with the express reservation of the Trustees' rights to supplement or amend their responses and objections as appropriate.

GENERAL OBJECTIONS

1. Each Trustee objects generally to the Request for Production to the extent that it purports to impose obligations beyond those imposed by the CPLR. Each Trustee will only respond to the Request for Production pursuant to its obligations under the CPLR.
2. Each Trustee objects generally to the Request for Production to the extent that it purports to require production of documents or information not reasonably related to or inconsistent with the scope of this special proceeding and the applicable standard of judicial review, and thus is not reasonably calculated to lead to discovery of admissible evidence.
3. Each Trustee objects generally to the Request for Production to the extent that it purports to require production of documents or information concerning trusts that are not Subject Trusts.
4. Each Trustee objects generally to the Request for Production to the extent that it seeks production of documents from or concerning any time period that is not relevant to the matters to be determined in this special proceeding and is thus beyond the permissible scope of discovery as provided by the CPLR.
5. Each Trustee objects generally to the Request for Production to the extent that it seeks production of documents or information subject to the attorney-client privilege, the common interest privilege, the work product doctrine, the protections afforded to information in connection with settlement negotiations, or any other applicable privilege or protection.
6. Each Trustee objects generally to the Request for Production to the extent that it seeks confidential or otherwise sensitive nonpublic information, including without limitation nonpublic personal information as that term is defined in the Gramm-Leach-Bliley Act of 1999 and the regulations promulgated thereunder, in the absence of the protection of an appropriate confidentiality order.
7. Each Trustee objects generally to the Request for Production to the extent that it is overly broad, unduly burdensome, or oppressive.
8. Each Trustee objects generally to the Request for Production to the extent that it seeks production of documents or information that by reason of public filing or otherwise are already in the Objectors' possession or are readily available to them.

9. Each Trustee objects generally to the Request for Production to the extent that it seeks production of documents or information not within their respective possession, custody, or control.

10. Each Trustee objects generally to the Request for Production to the extent that its definitions or instructions are overly broad, vague, or ambiguous, or purport to require each Trustee to perform obligations beyond those, if any, required by the CPLR.

11. The undersigned counsel are prepared to further confer with counsel for the Objectors concerning these objections and responses for the purpose of attempting to resolve any disputes without need for intervention by the Court.

SPECIFIC OBJECTIONS AND RESPONSES

Subject to the foregoing General Objections and without waiving them, and further without conceding that any documents or information are properly discoverable or relevant to the issues to be decided in this action, or are admissible as evidence in any proceeding, each Trustee further objects and responds to the Request for Production as follows:

REQUEST NO. 1:

Unredacted versions of the Expert Reports.

RESPONSE TO REQUEST NO. 1:

Subject to and without waiving the foregoing General Objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 1 other than responsive documents, if any, among those to be produced pursuant to the November 21, 2014 Letter.

REQUEST NO. 2:

Communications between any Trustee and any Trustee Expert or consultant hired by the Trustee pertaining to the Proposed Settlement.

RESPONSE TO REQUEST NO. 2:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents or information protected by one or more applicable privileges or other protections. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 3:

All pooling and servicing agreements, prospectus supplements, purchase agreements, and any other governing agreements for any JP Morgan Trust.

RESPONSE TO REQUEST NO. 3:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents that are already in the Objectors' possession or are readily available to them. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 4:

Documents provided to any Trustee by any Certificateholder opposing acceptance of the Proposed Settlement.

RESPONSE TO REQUEST NO. 4:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents that are already in the Objectors' possession or are readily available to them. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 5:

Documents concerning any Event of Default (or alleged Event of Default) in any JP Morgan Trust, including but not limited to, any communications concerning the prevention, curing, waiving, or tolling of any Event of Default.

RESPONSE TO REQUEST NO. 5:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents or information protected by one or more applicable privileges or other protections. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 6:

Documents concerning any potential or initiated Repurchase Action or Servicing Action by any Trustee, including but not limited to Documents related to any initial notice received by the Trustee, any applicable indemnity provided to the Trustee, and any loan file re-underwriting performed in connection with the Repurchase Action or Servicing Action.

RESPONSE TO REQUEST NO. 6:

In addition to the foregoing General Objections, each Trustee further objects to this request on the grounds that the phrase “any potential or initiated Repurchase Action or Servicing Action” is vague and ambiguous as used in the context of this request. Each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents or information protected by one or more applicable privileges or other protections. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 7:

Documents concerning any mortgage re-underwriting that was performed for loans backing any JP Morgan Trust.

RESPONSE TO REQUEST NO. 7:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents or information protected by one or more applicable privileges or other protections. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 8:

Documents concerning any modification of loans backing any JP Morgan Trust.

RESPONSE TO REQUEST NO. 8:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents or information protected by one or more applicable privileges or other protections. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 9:

Documents concerning any notices issued by any Trustee in connection with a Repurchase or Servicing Action contemplated or initiated by any Trustee for any JP Morgan Trust.

RESPONSE TO REQUEST NO. 9:

In addition to the foregoing General Objections, each Trustee further objects to this request on the grounds that the phrase “notices issued by any Trustee in connection with a Repurchase or Servicing Action contemplated or initiated by any Trustee” is vague and ambiguous as used in the context of this request. Each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents that are already in the Objectors’ possession or are readily available to them. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 10:

Documents concerning any tolling agreements that apply to any JP Morgan Trust.

RESPONSE TO REQUEST NO. 10:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents that are already in the Objectors’ possession or are readily available to them. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 11:

Documents concerning the liability of any Trustee for any conduct with regard to any JP Morgan Trust.

RESPONSE TO REQUEST NO. 11:

In addition to the foregoing General Objections, each Trustee further objects to this request on the grounds that the phrase “the liability of any Trustee for any conduct with regard to any JP Morgan Trust” is vague and ambiguous as used in the context of this request. Each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents or information protected by one or more applicable privileges or other protections. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the

parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 12:

Documents concerning any claims or lawsuits against any Trustee for any conduct with regard to any JP Morgan Trust.

RESPONSE TO REQUEST NO. 12:

In addition to the foregoing General Objections, each Trustee further objects to this request on the grounds that the phrase “any claims or lawsuits against any Trustee for any conduct with regard to any JP Morgan Trust” is vague and ambiguous as used in the context of this request. Each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents or information protected by one or more applicable privileges or other protections. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 13:

Documents concerning any indemnity provided to the Trustees in connection with the Settlement.

RESPONSE TO REQUEST NO. 13:

In addition to the foregoing General Objections, each Trustee further objects to this request on the grounds that the phrase “indemnity provided to the Trustees in connection with the Settlement” is vague and ambiguous as used in the context of this request. Each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents or information protected by one or more applicable privileges or other protections. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 14:

Documents concerning analysis by any Trustee of conflicts of interest, or self-dealing with regard to the Trustee’s evaluation or acceptance of the Settlement Agreement.

RESPONSE TO REQUEST NO. 14:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents or information

protected by one or more applicable privileges or other protections. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 15:

Documents concerning any analysis of losses to the JP Morgan Trusts provided to the Trustees by the Inside Institutional Investors, or any other Certificateholder.

RESPONSE TO REQUEST NO. 15:

In addition to the foregoing General Objections, each Trustee further objects to this request to the extent it is duplicative of Request No. 16, *infra*. Each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents that are already in the Objectors' possession or are readily available to them. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 16:

Documents concerning any analysis performed by or provided to any Trustee of Repurchase Losses or Servicing Losses incurred by the JP Morgan Trusts other than the analyses prepared by the Trustee Experts.

RESPONSE TO REQUEST NO. 16:

In addition to the foregoing General Objections, each Trustee further objects to this request to the extent it is duplicative of Request No. 15, *supra*. Each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents that are already in the Objectors' possession or are readily available to them. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 17:

Documents concerning the basis for the Haircut and any evaluation by the Trustees or the Experts of the reasonableness and/or fairness of the Haircut.

RESPONSE TO REQUEST NO. 17:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is duplicative of Request No. 43, *infra*, and on the grounds that the phrases "basis for the haircut" and "reasonableness and/or fairness of the Haircut" are vague and

ambiguous as used in the context of this request. Each Trustee further objects to this request because it is overbroad and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 17 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 18:

Documents concerning any evaluation by the Trustees or the Experts regarding the timeliness of repurchase claims under any Pooling and Servicing Agreement, or other governing agreement, providing in words or substance that such claims do not “accrue” until “(i) discovery of such breach by [the responsible party] or notice thereof by the party discovering such breach and (ii) failure by [the responsible party] to cure such breach, purchase such Mortgage Loan or substitute a qualifying Substitute Mortgage Loan . . .”

RESPONSE TO REQUEST NO. 18:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents or information protected by one or more applicable privileges or other protections. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 19:

For each Accepting Trust, the final certification provided by the Trustee (or custodian on behalf of the Trustee) to the Depositor regarding delivery of required mortgage documentation and any evidence regarding the cure of any exception identified on such final certification or the repurchase or substitution of the mortgage loan for which the exception was identified.

RESPONSE TO REQUEST NO. 19:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is overbroad and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 20:

Any letter from a Certificateholder (or group of Certificateholders) of an Accepting Trust to a Trustee purporting to direct the Trustee to accept, reject, or take any other action with respect to the Settlement Agreement.

RESPONSE TO REQUEST NO. 20:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents that are already in the Objectors' possession or are readily available to them. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 21:

Documents concerning the Allocation Formula set forth in Section 3.05 of the RMBS Trust Settlement Agreement (dated, as of November 15, 2013), including any analysis performed by or provided to any Trustee other than the analyses prepared by the Trustee Experts.

RESPONSE TO REQUEST NO. 21:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents or information protected by one or more applicable privileges or other protections. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. Wells Fargo Bank, N.A. ("Wells Fargo") further states that it has a good faith belief at this time that there are no documents in its possession, custody, or control responsive to Request No. 21 other than responsive documents, if any, among those to be produced pursuant to the November 21, 2014 Letter.

REQUEST NO. 22:

Documents concerning analysis by any Trustee concerning the Settlement Payment and/or the Settlement amount other than the analysis prepared by the Trustee Experts.

RESPONSE TO REQUEST NO. 22:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is overbroad, seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence, and seeks documents or information protected by one or more applicable privileges or other protections. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and

information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. Wells Fargo further states that it has a good faith belief at this time that there are no documents in its possession, custody, or control responsive to Request No. 22 other than responsive documents, if any, among those to be produced pursuant to the November 21, 2014 Letter.

REQUEST NO. 23:

Documents containing or describing the process of estimation of Representation and Warranty Losses discussed in Paragraphs 51-54 of Faten Sabry's Expert Report (the "Sabry Report").

RESPONSE TO REQUEST NO. 23:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports and is overbroad and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 23 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 24:

Documents containing or describing the "GSE Demand Data" described in Paragraph 55 of the Sabry Report.

RESPONSE TO REQUEST NO. 24:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 24 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 25:

Documents containing or describing the scoring analysis described in Paragraph 61 of the Sabry Report, and documents containing or describing the results of such analysis.

RESPONSE TO REQUEST NO. 25:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 25 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 26:

Documents containing or describing propensity scoring or the application thereof as described in Paragraph 61 of the Sabry Report.

RESPONSE TO REQUEST NO. 26:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 26 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 27:

Documents describing the results of the balance tests described in Paragraph 62 of the Sabry Report.

RESPONSE TO REQUEST NO. 27:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 27 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 28:

Loan level repurchase data described in Paragraph 70 of the Sabry Report.

RESPONSE TO REQUEST NO. 28:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 28 other than responsive documents, if any, among those to be produced pursuant to the November 21, 2014 Letter.

REQUEST NO. 29:

The list of repurchase demands described in Paragraph 71 of the Sabry Report.

RESPONSE TO REQUEST NO. 29:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to

Request No. 29 other than responsive documents, if any, among those to be produced pursuant to the November 21, 2014 Letter.

REQUEST NO. 30:

Documents evidencing the estimation of agree rates and demand rates described in Paragraphs 72 and 73 of the Sabry Report.

RESPONSE TO REQUEST NO. 30:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 30 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 31:

The Repurchase Demand Data described in Paragraph 74 of the Sabry Report.

RESPONSE TO REQUEST NO. 31:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 31 other than responsive documents, if any, among those to be produced pursuant to the November 21, 2014 Letter.

REQUEST NO. 32:

The Chase Repurchase Demand data described in Paragraph 76 of the Sabry Report.

RESPONSE TO REQUEST NO. 32:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that

are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 32 other than responsive documents, if any, among those to be produced pursuant to the November 21, 2014 Letter.

REQUEST NO. 33:

The statistical models referred to in Paragraph 82 of the Sabry Report.

RESPONSE TO REQUEST NO. 33:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 33 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 34:

Documents containing or describing the “standard statistical method” referred to in Paragraph 85 of the Sabry Report.

RESPONSE TO REQUEST NO. 34:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 34 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 35:

Documents containing or describing the imputation of probability of repurchase described in Paragraph 86 of the Sabry Report.

RESPONSE TO REQUEST NO. 35:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 35 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 36:

Documents containing or describing the quintile analysis discussed in Paragraph 88 of the Sabry Report, and the statistical tests described in the last sentence of such paragraph.

RESPONSE TO REQUEST NO. 36:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 36 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 37:

The econometric model discussed in Paragraph 95 of the Sabry Report.

RESPONSE TO REQUEST NO. 37:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that

are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 37 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 38:

The competing risk model referred to in Paragraph 103 of the Sabry Report.

RESPONSE TO REQUEST NO. 38:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 38 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 39:

Documents related to the concerns outlined in paragraphs 92-94 of Daniel Fischel's Expert Report (the "Fischel Report") regarding the purported benefits of the subservicing protocol to be implemented by the Settlement Agreement set forth in Jeremy E. Reifsnyder's Expert Report (the "Reifsnyder Report").

RESPONSE TO REQUEST NO. 39:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 40:

Documents related to the concerns outlined in paragraph 104 of the Fischel Report regarding the difficulty in measuring how the “servicing loss differential” set forth in Reifsnnyder Report relates to scenarios in which JPMorgan would be liable for damages for deficient servicing.

RESPONSE TO REQUEST NO. 40:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 41:

Documents supporting the statements in footnotes 56 and 59 of the Fischel Report that: (a) the default rate for loans in the Trusts, controlling for disclosed characteristics, is higher than the loans involved in the Countrywide and Citigroup Settlements; and (b) that the Report’s findings do not support the hypothesis that the Proposed Settlement is low because the loans in the Trusts are relatively less likely to have Material Breaches than the loans involved in the Countrywide and Citigroup Settlements.

RESPONSE TO REQUEST NO. 41:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 42:

The following categories of Documents referenced in footnote 17 of Fischel Report:

- a. The submissions by the Inside Institutional Investors and JP Morgan in the course of their negotiations and mediation;
- b. The terms of any JP Morgan settlement of RMBS claims with other parties other than the FHFA (redacted to obscure the identity of the settling claimant(s) as necessary under applicable confidentiality agreements);

- c. Any updated or corrected information provided by JP Morgan to the Trustees or Daniel Fischel.

RESPONSE TO REQUEST NO. 42:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 42 other than responsive documents, if any, among those to be produced pursuant to the November 21, 2014 Letter.

REQUEST NO. 43:

Documents that form the basis for the Fischel Report's conclusion that re-purchase claims will expire on a certain date or that re-purchase claims are already time barred.

RESPONSE TO REQUEST NO. 43:

In addition to the foregoing General Objections, each Trustee further objects to this request on the grounds that the phrase "re-purchase claims will expire on a certain date" is vague and ambiguous as used in the context of this request. Each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 43 other than responsive documents, if any, (i) among those to be produced pursuant to the November 21, 2014 Letter or (ii) in the possession, custody, or control of one or more of the expert advisors retained by the Trustees in connection with their evaluation of the Settlement.

REQUEST NO. 44:

Documents establishing the basis for the 90% Net Loss reduction (referred to as a "haircut" in the Fischel Report) in calculating the "Adjusted Individual Trust Loss" for JPMorgan Trusts as described in 3.05(b)(ii) of the Settlement Agreement.

RESPONSE TO REQUEST NO. 44:

In addition to the foregoing General Objections, each Trustee further objects to this request because it is duplicative of Request No. 17, *supra*, and on the grounds that the phrase

“establishing the basis for the 90% Net Loss reduction” is vague and ambiguous as used in the context of this request. Each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production. The Trustees further state that they have a good faith belief at this time that there are no documents in their respective possession, custody, or control responsive to Request No. 44 other than responsive documents, if any, among those to be produced pursuant to the November 21, 2014 Letter.

REQUEST NO. 45:

Documents related to Jeremy Reifsnyder’s request to review a representative, statistically significant sample of complete JPMorgan loan servicing files and records, including any responses by the Trustees, JPMorgan, and/or the Inside Institutional Investors thereto.

RESPONSE TO REQUEST NO. 45:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

REQUEST NO. 46:

Documents related to Reifsnyder Report’s use of the “servicing loss differential” methodology in lieu of directly estimating potential servicing claims that might be released by the acceptance of the Settlement Agreement, including but not limited to any explanation by Mr. Reifsnyder or Boston Portfolio Advisors, Inc. to the Trustees, JPMorgan, and/or the Inside Institutional Investors regarding the servicing loss differential methodology.

RESPONSE TO REQUEST NO. 46:

In addition to the foregoing General Objections, each Trustee further objects to this request because it mischaracterizes the Expert Reports, is overbroad, and seeks documents that are not relevant and not reasonably calculated to lead to discovery of admissible evidence. Subject to and without waiving the foregoing objections, the Trustees will produce the categories of documents and information identified in the November 21, 2014 Letter, subject to the parameters described therein, concerning the Subject Trusts as their complete response to the Request for Production.

Dated: December 5, 2014
New York, New York

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AFFIRMATION OF SERVICE

I, Joseph B. Sconyers, an attorney admitted to practice in the courts of New York and not a party to this action, hereby affirm under penalties of perjury that on December 5, 2014, I caused a true and complete copy of the foregoing document to be delivered by electronic mail and U.S. Mail to the following:

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