

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, THE SEGREGATED ACCOUNT OF AMBAC:
ASSURANCE CORPORATION (intervenor), AND W&L:
INVESTMENTS, LLC (intervenor).

Respondents,

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

Index No. 652382/2014

Assigned to: Friedman, J.

**STIPULATION
CONSENTING TO
ENTRY OF PROPOSED
ORDER REGARDING
THE PRODUCTION OF
DRAFT SETTLEMENT
AGREEMENTS
WITHOUT WAIVER OF
PRIVILEGE OR
OBJECTIONS**

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IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for all parties to the above captioned proceeding, that: (i) the [Proposed] Order on Consent Regarding the Production of Draft Settlement Agreements Without Waiver of Privilege or Objections, attached hereto as Exhibit "1," may be presented to the Court without further notice to be signed on consent; and (ii) email, electronic, conformed, and facsimile signatures on this Stipulation shall be the equivalent of original signatures

Dated: May 22, 2015

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