

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

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In the matter of the application of

:
: Index No. 652382/2014
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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),

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: Part 60
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: Motion Sequence No. 18
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: Hon. Marcy S. Friedman
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: Oral Argument Requested
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: **AFFIRMATION OF**
: **MICHAEL C. LEDLEY IN**
: **SUPPORT OF**
: **RESPONDENT-**
: **INVESTORS' MOTION TO**
: **COMPEL PRODUCTION OF**
: **DOCUMENTS FROM**
: **JPMORGAN**

Petitioners,

for an order, pursuant to CPLR § 7701, seeking judicial
instruction.

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I, Michael C. Ledley, hereby affirm under the penalty of perjury that the following is true and correct:

1. I am a member of the Bar of this Court and a partner of Wollmuth Maher & Deutsch LLP, attorneys for Respondent-Investors Ambac Assurance Corporation and The Segregated Account of Ambac Assurance Corporation (collectively, “Ambac”) and the QVT Fund V LP, QVT Fund IV Lp and Quintessence Fund L.P. (collectively, the “QVT Funds”).

2. I submit this affirmation in support of Respondent-Investors’ Motion to Compel JPMorgan Chase & Co. (“JPMorgan”) to produce documents. The parties have met and conferred with respect to their respective positions, but have been unable to resolve the present dispute.

3. Attached hereto as **Exhibit 1** is a true and correct copy of Respondent-Investors’ First Set of Requests for Production of Documents to JPMorgan, dated December 8, 2014.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the March 4, 2015 letter from Robert A. Sacks to Michael C. Ledley.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the March 6, 2015 letter from Michael C. Ledley to Robert A. Sacks.

6. Attached hereto as **Exhibit 4** is a true and correct copy of the March 17, 2015 letter from Robert A. Sacks to Michael C. Ledley.

7. Attached hereto as **Exhibit 5** is a true and correct copy of the April 21, 2015 letter from Michael C. Ledley to Robert A. Sacks.

8. Attached hereto as **Exhibit 6** is a true and correct copy of the April 27, 2015 letter from Robert A. Sacks to Michael C. Ledley.

9. Attached hereto as **Exhibit 7** is a true and correct copy of the Stipulated Order Extending Production Deadline Set on October 17, 2013, *Fed. Home Loan Bank of Pittsburgh v. J.P. Morgan Secs. LLC*, GD09-016892 (Pa. C.P. Allegheny Cty. Nov. 4, 2013)

WHEREFORE it is respectfully requested that Respondent-Investors' Motion to Compel JPMorgan to produce the requested documents in the above-captioned matter be granted.

Affirmed this 29th day of May, 2015.

/s/ Michael C. Ledley

Michael C. Ledley