

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

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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,

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

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: Index No. 652382/2014
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: Part 60
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: Motion Sequence No. _____
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: Hon. Marcy S. Friedman
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: Oral Argument Requested
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: **NOTICE OF MOTION TO
COMPEL DISCLOSURE
FROM THE TRUSTEES**

PLEASE TAKE NOTICE that Respondent-Investors,¹ by and through their undersigned attorneys, upon the accompanying Memorandum of Law dated July 7, 2015, and upon all prior pleadings and proceedings herein, shall, pursuant to Rule 3124 of the Civil Practice Law and Rules move this Court located at 60 Centre Street, Room 130, New York, New York 10007, on the 20th day of July, 2015 at 9:30 a.m., or as soon thereafter as counsel may be heard, for an Order directing the Trustees to produce documents in accordance with Respondent-Investors' requests, as set forth in the accompanying Memorandum of Law.

¹ The Respondent-Investors are 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 ("NCUA"); the QVT Fund V LP, QVT Fund IV LP and Quintessence Fund L.P. (the "QVT Funds"); Ambac Assurance Corporation and The Segregated Account of Ambac Assurance Corporation ("Ambac"); DW Catalyst Master Fund, Ltd. and DW Value Master Fund, Ltd. (formerly Brevan Howard Credit Catalysts Master Fund Limited and Brevan Howard Credit Value Master Fund Limited) (the "DW Funds"); Triaxx Prime CDO 2006-1, Ltd., Triaxx Prime CDO 2006-2, Ltd., and Triaxx Prime CDO 2007- 1, Ltd. ("Triaxx"); and W&L Investments, LLC ("W&L") (collectively, the "Respondent-Investors"). As set forth in the accompanying Memorandum of Law, Respondent-Investors other than W&L join in all parts of the motion except Section V, while W&L has set forth its specific discovery requests in Section V, and joins in this omnibus motion only as it concerns the specific discovery requests W&L has made and is seeking to compel therein.

DATED: New York, NY
July _____, 2015

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