

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	:	Part 60
BANK OF NEW YORK MELLON, THE BANK OF	:	
NEW YORK MELLON TRUST COMPANY, N.A.,	:	Motion Sequence No. 21
WILMINGTON TRUST, NATIONAL	:	
ASSOCIATION, LAW DEBENTURE TRUST	:	Hon. Marcy S. Friedman
COMPANY OF NEW YORK, WELLS FARGO	:	
BANK, NATIONAL ASSOCIATION, HSBC BANK	:	Oral Argument Requested
USA, N.A., AND DEUTSCHE BANK NATIONAL	:	
TRUST COMPANY (as trustees under various Pooling	:	AFFIRMATION OF
and Servicing Agreements and indenture trustees under	:	MICHAEL C. LEDLEY IN
various Indentures), AEGON USA Investment	:	SUPPORT OF
Management, LLC (intervenor), Bayerische	:	RESPONDENT-
Landesbank (intervenor), BlackRock Financial	:	INVESTORS' OMNIBUS
Management, Inc. (intervenor), Cascade Investment,	:	MOTION TO COMPEL THE
LLC (intervenor), the Federal Home Loan Bank of	:	INSTITUTIONAL
Atlanta (intervenor), the Federal Home Loan Mortgage	:	INVESTORS
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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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' omnibus motion to compel the Institutional Investors. The parties have met and conferred with respect to their respective positions, but have been unable to resolve the present dispute.

3. I have knowledge of the facts set forth herein on the basis of personal knowledge and the review of documents in the possession of my firm.

4. Attached hereto as **Exhibit 1** is a true and correct copy Respondent-Investors' First Set of Requests for Production of Documents, dated November 26, 2014.

5. Attached hereto as **Exhibit 2** is a true and correct copy of the Institutional Investors' Objections and Responses to Respondent-Investors' First Set of Requests for Production of Documents and First Set of Interrogatories, dated December 16, 2014.

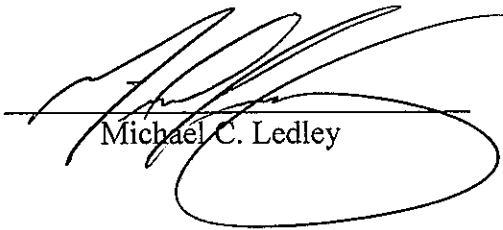
6. Attached hereto as **Exhibit 3** is a true and correct copy of W&L Investments, LLC's First Set of Discovery Requests to the Institutional Investors, dated January 2, 2015.

7. Attached hereto as **Exhibit 4** is a true and correct copy of the Institutional Investors' Objections and Responses to W&L Investments' First Set of Discovery Requests, dated January 13, 2015.

8. Attached hereto as Exhibit 5 is a true and correct copy of the Court's Order On Consent Regarding the Production of Draft Settlement Agreements Without Waiver of Privilege or Objections, dated June 18, 2015.

WHEREFORE it is respectfully requested that Respondent-Investors' omnibus motion to compel the Institutional Investors be granted.

Affirmed this 7th day of July, 2015.



Michael C. Ledley