

EXHIBIT 4

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),

Petitioners,

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

Index No. 652382/2014

**THE INSTITUTIONAL INVESTORS' OBJECTIONS AND RESPONSES
TO TRIAXX'S FIRST SET OF INTERROGATORIES**

Pursuant to CPLR §§ 3122 and 3133, AEGON USA Investment Management, LLC, Bayerische Landesbank, BlackRock Financial Management, Inc., Cascade Investment, LLC, the Federal Home Loan Bank of Atlanta, the Federal Home Loan Mortgage Corporation (Freddie Mac), the Federal National Mortgage Association (Fannie Mae), Goldman Sachs Asset Management L.P., Voya Investment Management LLC (f/k/a ING Investment Management LLC), Invesco Advisers, Inc., Kore Advisors, L.P., Landesbank Baden-Wuerttemberg, Metropolitan Life Insurance Company, Pacific Investment Management Company LLC, Sealink Funding Limited, Teachers Insurance and Annuity Association of America, The Prudential Insurance Company of America, the TCW Group, Inc., Thrivent Financial for Lutherans, and Western Asset Management Company (each for themselves and, to the extent applicable, as investment manager of funds and accounts, and collectively, the "Institutional Investors") object and respond to The Triaxx Parties' First Set of Interrogatories to the Institutional Investors

(collectively, the "Interrogatories" and, individually, an "Interrogatory"). The Responses and Objections below are based upon information presently known to the Institutional Investors and without prejudice to their right to assert additional objections or supplemental responses. The Institutional Investors reserve their right to amend, supplement, correct or clarify these responses and objections set forth herein.

Objections and Responses

Interrogatories

1. Identify Your holdings in the JP Morgan Trusts, as of the three dates below, including the following information for each security and "as of" date: Name of Issuing Trust, CUSIP Number, Original Unpaid Principal Balance, and Current Unpaid Principal Balance:
 - a. September 1, 2008;
 - b. April 1, 2009;
 - c. November 1, 2013; and
 - d. August 1, 2014

Your answers to this Interrogatory shall be provided in a simple table or spreadsheet formatted as described on page "3" of the II FSI.

Objections and Response to Interrogatory 1:

1. The Institutional Investors object to subparts (a) and (b) of this Interrogatory, seeking holdings information as of September 1, 2008 and April 1, 2009 as unduly broad, overly burdensome and as seeking information that is neither relevant to this proceeding, nor likely to lead to the discovery of relevant information. The Institutional Investors' holdings in 2008 and 2009 have no relevance to the sole issue in this proceeding: whether the Trustees acted within the scope of their reasonable discretion in entering into the Settlement Agreement.

2. The Institutional Investors object to this Interrogatory because it seeks information regarding trusts in which Triaxx has no holdings, and therefore has no standing to raise an objection or seek discovery. Notwithstanding this objection, and without waiving it, the

Institutional Objectors will produce information regarding their holdings in trusts other than those in which Triaxx holds securities, subject to the additional objections set forth below.

3. Many of the Institutional Investors maintain historical holdings information on a month-end basis only, in the normal course of their business. Accordingly, in responding to this interrogatory, the Institutional Investors whose records are maintained in this manner will provide holdings information, subject to the other objections stated herein, as of the month-end date nearest the date specified in the interrogatory. In the event that Triaxx contends that such month end information is insufficient or inadequate, the Institutional Investors object to this Interrogatory as unduly burdensome to the extent it seeks information or documents that would have to be restored from backup tapes or is otherwise not reasonably accessible.

4. The Institutional Investors object to this Interrogatory because it seeks the production of material that is commercially sensitive information, and contains trade secrets, and/or confidential information concerning investment holdings and strategies. Subject to this objection, and the other objections set forth herein, the Institutional Investors will provide the requested information with respect to subparts (c) and (d) promptly upon the entry of a protective order shielding this information and limiting its use and dissemination. Until such an order is entered, however, they object to this Interrogatory.

Dated: New York, New York
January 13, 2015.

WARNER PARTNERS, P.C.

By: /s/ Kenneth E. Warner
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Investors*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of these Objections and Responses were served on counsel of record for all parties at the address of their counsel of record, via electronic mail and first class mail, on this the 13th day of January 2015.

/s/ David Sheeren
David Sheeren