

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-

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

The Honorable Marcy S. Friedman,  
J.S.C.

Motion Seq. No. \_\_\_\_

**Oral Argument Requested**

**AFFIRMATION OF NIDHI  
NINA YADAVA**

I, Nidhi Nina Yadava, an attorney admitted to practice in the courts of the State of New York, affirms under penalty of perjury as follows:

1. I am an associate in the law firm Jones Day, attorneys for Petitioner U.S. Bank National Association (“Trustee”). I submit this affirmation in support of the Trustee’s Motion to Compel QVT to Produce Documents, filed on July 7, 2015.

2. Attached hereto as Exhibit 1 is QVT’s Memorandum of Law in Support of [its] Motion to Intervene, filed on October 31, 2014.

3. Attached hereto as Exhibit 2 is QVT’s March 6, 2015 letter regarding summary judgment.

4. Attached hereto as Exhibit 3 is U.S. Bank’s First Request for the Production of Documents to QVT, served on May 12, 2015.

5. Attached hereto as Exhibit 4 is the Responses and Objections to U.S. Bank’s First Request for the Production of Documents and First Interrogatory to QVT, served on June 4, 2015.

6. Attached hereto as Exhibit 5 is the 6/22/15 Letter from the Objectors to the Trustees regarding proposed schedule.

7. Attached hereto as Exhibit 6 is the 6/24/15 Letter from the Trustees to the Objectors regarding proposed schedule.

8. Attached hereto as Exhibit 7 is the 6/29/15 Email from the Objectors to the Trustees regarding proposed schedule.

9. Attached hereto as Exhibit 8 is the 6/30/15 Email from the Trustees to the Objectors regarding revised proposed schedule.

10. Attached hereto as Exhibit 9 is the 6/30/15 Email from QVT to Trustee regarding revised proposed schedule.

11. Attached hereto as Exhibit 10 is the 7/1/15 Email from Trustee to QVT regarding document production.

12. Attached hereto as Exhibit 11 is the 7/2/15 Email from Trustee to QVT regarding document production.

Dated: July 7, 2015  
New York, New York

/s/ Nidhi Nina Yadava  
Nidhi Nina Yadava