

# **Exhibit 6**

# JONES DAY

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## **BY EMAIL**

Michael Ledley  
Wollmuth Maher & Deutsch LLP  
500 Fifth Avenue  
New York, NY 10110

Re: In the Matter of U.S. Bank Nat'l Ass'n, et al., N.Y. Sup. Ct. No. 652382/2014

Dear Mike:

We are in receipt of your letter dated June 22, 2015 and have considered the proposed deadlines set forth therein. While we are in agreement with a number of your proposed dates, we hereby set forth a counter-proposal, which modifies certain dates and likewise seeks to clarify the associated descriptions of deadlines.

- 6/25/15: Trustees provide Respondent-Investors with proposed form of privilege log. Respondent-Investors provide Trustees with list of document categories on which they intend to move to compel
- 6/30/15: Trustees complete production they have commenced. Parties meet and confer on form of privilege log and conduct final meet and confer on outstanding document requests to Trustees. QVT to complete document production.
- 7/7/15: All parties serve their omnibus motions to compel
- 7/14/15: All parties serve and file oppositions to the omnibus motions
- 7/17/15: All moving parties serve and file reply submissions on the omnibus motions
- 7/24/15: Trustees' privilege log due
- 10/30/15: Completion of all fact discovery, completion of depositions of Trustee experts, and all parties to serve list of names and topics of any additional experts
- 11/13/15: Respondent-Investors to serve expert reports (if any); Petitioners to serve additional expert reports (if any)
- 12/8/15: Any party to serve rebuttal expert report

12/23/15: Completion of depositions of experts designated by Respondent-Investors and any additional experts designated by Petitioners

1/13/16: Pre-hearing briefs due if permitted by the Court

Additionally, the Trustees understand they will be receiving a list of document categories on which the Objectors intend to move to compel on Thursday, June 25, 2015. The Trustees propose a meet and confer on Friday, June 26, 2015 at 4:00 pm EST to begin discussions about this list.

Please let us know if this schedule is acceptable and whether the Objectors can meet and confer at the time proposed.

Very truly yours,

/s/ Matthew A. Martel  
Matthew A. Martel

cc: All counsel of record