

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 :
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-Wurttemberg (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),

: Part 60
: Motion Sequence No. 22
: Hon. Marcy S. Friedman
: Oral Argument Requested
: **AFFIRMATION OF NIRAJ**
: **J. PAREKH IN FURTHER**
: **SUPPORT OF**
: **RESPONDENT-**
: **INVESTORS' MOTION TO**
: **COMPEL PRODUCTION OF**
: **DOCUMENTS FROM**
: **JPMORGAN**

Petitioners,

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

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I, Niraj J. Parekh, 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 an attorney of the firm 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 further support of Respondent-Investors’ Motion to Compel JPMorgan Chase & Co. (“JPMorgan”) to produce documents.

3. On July 7, 2015, I provided the United States Department of Justice (the “DOJ”) with courtesy copies of Respondents’ moving papers and informed the DOJ of the briefing schedule.

WHEREFORE it is respectfully requested that Respondent-Investors’ Motion to Compel JPMorgan to produce the requested documents in the above-captioned matter be granted.

Affirmed this 17th day of July, 2015.



Niraj J. Parekh