

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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In the matter of the application of :
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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 : Index No. 652382/2014
DEBENTURE TRUST COMPANY OF NEW :
YORK, WELLS FARGO BANK, NATIONAL : Motion Sequence Nos. 1 & 4
ASSOCIATION, HSBC BANK USA, N.A., and :
DEUTSCHE BANK NATIONAL TRUST : The Honorable Marcy S. Friedman, J.S.C.
COMPANY (as Trustees under various Pooling : Commercial Division
and Servicing Agreements and Indenture : Part 60
Trustees under various Indentures), :
: :
Petitioners, :
: :
for an order, pursuant to CPLR § 7701, seeking :
judicial instructions and approval of a proposed :
settlement. :
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**JPMORGAN CHASE & CO.’S NOTICE
OF INTENT TO APPEAR AND STATEMENT OF POSITION**

JPMorgan Chase & Co. (“JPMorgan”), by its counsel Sullivan & Cromwell LLP, hereby files this notice of intent to appear in the above-captioned proceeding pursuant to paragraph 6 of this Court’s August 15, 2014 Interim Decision and Order on Petitioners’ Order to Show Cause (the “Order”).

JPMorgan, on behalf of itself and its affiliates, is a party to the Settlement Agreement entered into on November 15, 2013, and modified as of July 29, 2014 (the “Settlement”), that is the subject of this proceeding. As a result, JPMorgan will be directly affected by the approval or denial of the Trustees’ petition.

JPMorgan appears to support the Trustees' petition and the Settlement, and to address, as may be appropriate, any objections that may be filed or other issues that may arise in the course of this proceeding.¹

Dated: New York, New York
October 31, 2014

Respectfully submitted,

SULLIVAN & CROMWELL LLP

/s/ Robert A. Sacks

Robert A. Sacks
Darrell S. Cafasso
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

Counsel for JPMorgan Chase & Co.

¹ Although the Court's Order does not require formal intervention, JPMorgan would be entitled to intervene as of right pursuant to CPLR § 1012(a) because the proceeding involves "the disposition or distribution of, or the title or a claim for damages for injury to, property" and JPMorgan will be affected by the Court's decision on the petition. As a party to the Settlement, JPMorgan has "a bona fide interest in an issue involved in [this] action." *CMS Life Ins. Opportunity Fund L.P. v. Progressive Capital Solutions, LLC*, No. 653646/2011, 2014 WL 939303, at *2 (Sup. Ct. N.Y. Cnty. Mar. 6, 2014) (Friedman, J.) (quoting *Yuppie Puppy Pet Prods., Inc. v. Street Smart Realty, LLC*, 77 A.D.3d 197, 201 (1st Dep't 2010)).