

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

In the matter of the application of

WELLS FARGO BANK, NATIONAL ASSOCIATION,
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, HSBC BANK USA,
N.A., and DEUTSCHE BANK NATIONAL TRUST
COMPANY (as Trustees, Indenture Trustees, Securities
Administrators, Paying Agents, and/or Calculation Agents of
Certain Residential Mortgage-Backed Securitization Trusts),

Petitioners,

For Judicial Instructions under CPLR Article 77 on the
Administration and Distribution of a Settlement Payment.

Index No. 657387/2017

IAS Part 60

Honorable Marcy S. Friedman

**NOTICE OF MOTION TO
FILE DOCUMENTS UNDER
SEAL**

PLEASE TAKE NOTICE that, upon the accompanying affirmation of Philip Bentley, dated March 12, 2018, Tilden Park Investment Master Fund LP, Tilden Park Management I LLC and Tilden Park Capital Management LP, on behalf of themselves and their advisory clients (collectively, “Tilden Park”), AEGON USA Investment Management, LLC, 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), the Federal National Mortgage Association (Fannie Mae), Goldman Sachs Asset Management L.P., Voya Investment Management LLC, Invesco Advisers, Inc., Kore Advisers, L.P., Metropolitan Life Insurance Company, Pacific Investment Management Company LLC, Teachers Insurance and Annuity Association of America, the TCW Group, Inc., Thrivent Financial for Lutherans, Western Asset Management Company (collectively, with the other parties listed after Tilden Park, the “Institutional Investors”), American General Life

Insurance Company, American Home Assurance Company, Lexington Insurance Company, National Union Fire Insurance Company of Pittsburgh, Pa., The United States Life Insurance Company in the City of New York, The Variable Annuity Life Insurance Company (collectively, with the other parties listed after the Institutional Investors, “the AIG Parties”), DW Partners LP, Olifant Fund, Ltd., FYI Ltd., and FFI Fund Ltd. (collectively, with the other parties listed after DW Partners LP, the “Olifant Funds,” and together with all of the aforementioned parties, the “Challenging Respondents”) will move this Court before the Honorable Marcy S. Friedman on March 20, 2018 at 9:30 a.m., or as soon thereafter as counsel may be heard, at the Motion Support Office, Room 130 of the Courthouse of the Supreme Court of the State of New York, 60 Centre Street, New York, New York 10007, for an order, pursuant to 22 N.Y.C.R.R. § 216.1: (i) permitting the Challenging Respondents to file under seal an exhibit to the Consolidated Memorandum of Law in Support of Joint Motion to Limit Standing to Certificateholders in the Settlement Trusts; and (ii) permitting Tilden Park to file under seal unredacted versions of (a) its memorandum of law in support of its motion to limit standing with respect to one particular Settlement Trust (the “Tilden Park Motion”), and (b) the affirmation of Philip Bentley, together with exhibits, filed in support of the Tilden Park Motion;

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR 2214(b), answering papers, if any on this motion, are required to be served no later than two (2) days prior to the return date of this motion.

Dated: New York, NY
March 12, 2018

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