

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: IAS PART 60**

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 Distribution of a Settlement Payment.

Index No. 657387/2017  
(Friedman, J.)

**Motion Sequence No. 010**

**AFFIRMATION OF JOHN M. LUNDIN  
IN SUPPORT OF MOTION FOR LEAVE  
TO AMEND**

**JOHN M. LUNDIN**, an attorney duly licensed to practice law in the State of New York affirms the following under penalty of perjury:

1. I am a member of Schlam Stone & Dolan LLP, counsel to Respondent HBK Master Fund L.P. (“HBK”) in this action. I submit this affirmation in support of HBK’s motion pursuant to CPLR 3025(b) for leave to amend its answer (the “Answer”) to the Petition for Judicial Instructions under CPLR Article 77 on the Distribution of a Settlement Payment (the “Petition”).
2. Attached hereto as Exhibit A is a true and correct copy of HBK’s proposed amended answer clearly showing the changes or additions to the Answer.
3. Attached hereto as Exhibit B is a true and correct copy of the Answer, excluding exhibits.

4. Attached hereto as Exhibit C is a true and correct copy of the Affidavit of Beaugard A. Fournet, which was attached as Exhibit 2 to the Answer.

5. Attached hereto as Exhibit D is a true and correct copy of relevant excerpts of the transcript of the oral argument before the Court, dated May 7, 2018, on certain Interested Parties' motion to limit standing in this proceeding to certificateholders in the Settlement Trusts (the "Standing Motion").

6. Attached hereto as Exhibit E is a true and correct list of the direct certificate holdings in the HBK Trusts that HBK wishes to add to its Amended Answer.

Dated: New York, New York  
May 16, 2018

A handwritten signature in black ink, appearing to read "John M. Lundin", is written over a horizontal line.

JOHN M. LUNDIN