

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

**NOTICE OF [PROPOSED]  
PARTIAL SEVERANCE  
ORDER AND PARTIAL  
FINAL JUDGMENT**

**(SAMI 2005-AR4)**

Tilden Park Investment Master Fund LP, Tilden Park Management I LLC, and Tilden Park Capital Management LP, each on behalf of itself and its advisory clients (“Tilden Park”), the Institutional Investors,<sup>1</sup> and Nover Ventures, LLC (“Nover”) respectfully submit a [Proposed] Partial Severance Order and Partial Final Judgment (the “Proposed Order”) concerning SAMI 2005-AR4 (the “Undisputed Trust”).<sup>2</sup> This trust has not been the subject of any previous proposed severance orders presented to the Court in this proceeding. As fully set forth in the Proposed Order, Tilden Park, the Institutional Investors, and Nover are the only parties claiming an interest in the Undisputed Trust with standing to appear with respect to it, and respectfully urge the Court to enter the Proposed Order. As there is no triable issue of fact as

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<sup>1</sup> All references to the ‘Institutional Investors’ include each and every one of the sixteen institutions identified in the Institutional Investors’ Notice of Appearance (NYSCEF No. 135).

<sup>2</sup> In the Court’s February 13, 2020 Decision and Order, the Court ordered, among other things, that “as to any Settlement Trust in which all interested respondents are able, after the issuance of this decision and in consultation with the Trustees, to resolve a dispute as to any issue that is the subject of this proceeding, they may do so independent of the court’s ultimate determination as to how such issue should be resolved among parties that continue to dispute the issue.” Dkt. 843.

to the Undisputed Trust or the entry of this judgment, Tilden Park, the Institutional Investors, and Nover request that the judgment be entered without further delay so that the Subject Allocable Share can promptly be paid.

Tilden Park, the Institutional Investors, and Nover have conferred with the trustee for the trust, The Bank of New York Mellon, and the payment administrator for the trust, Wells Fargo Bank, National Association, who have confirmed that they have no objection to the Proposed Order.

Dated: New York, New York  
October 12, 2021

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