

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

In the matter of the application of

THE BANK OF NEW YORK MELLON (as Trustee under various Pooling and Servicing Agreements and Indenture Trustee under various Indentures), *et al.*

Petitioners,

for an order, pursuant to C.P.L.R. § 7701, seeking judicial instructions and approval of a proposed settlement.

Index No. 651786/2011

Assigned to:
Hon. Saliann Scarpulla

**AFFIRMATION OF
MICHAEL A. ROLLIN
IN SUPPORT OF
REPLY IN SUPPORT
OF ORDER TO SHOW
CAUSE WHY THIS
COURT SHOULD NOT
STAY ENTRY OF
FINAL JUDGMENT**

Michael A. Rollin, an attorney duly admitted to practice law before the courts of the State of New York, hereby affirms under the penalty of perjury as follows:

1. I am a member of the Bar of the State of New York and a member of Jones & Keller, P.C., co-counsel along with Flemming Zulack Williamson Zauderer LLP and Reilly Pozner LLP for the AIG entities in this matter.

2. AIG is one of several Respondents in this matter. I am familiar with the matters referenced herein and submit this affirmation in support of AIG's Reply in Support of Motion for Order to Show Cause Why This Court Should Not Stay Entry of Final Judgment.

3. Attached as Exhibit A is a true and accurate copy of excerpts from the Hearing Transcript of this matter.

4. Attached as Exhibit B is a true and accurate copy of the February 11, 2014 Letter from counsel for Respondents to counsel for Petitioner the Bank of New York Mellon Re: Loan Modification Claims of the Covered Trusts.

5. Attached as Exhibit PTX 1 is a true and accurate copy of excerpts from Hearing Exhibit PTX 1 (the Settlement Agreement), which was entered into evidence on June 6, 2013.

6. Attached as Exhibit PTX 3 is a true and accurate copy of excerpts from Hearing Exhibit PTX 3 (the Institutional Investor Agreement), which was entered into evidence on June 6, 2013.

7. Attached as Exhibit R-4 is a true and accurate copy of Hearing Exhibit R-4 (the Proposed Final Order and Judgment), which was entered into evidence on July 9, 2013.

8. Attached as Exhibit R-4181 is a true and accurate copy of excerpts from Hearing Exhibit R-4181 (Buechele Deposition Designations), which was entered into evidence on November 19, 2013.

Dated this 18th day of February, 2014.



Michael A. Rollin