

Exhibit 4

October 24, 2012

Via E-mail and U.S. Mail

Matthew D. Ingber, Esq.
Mayer Brown LLP
1675 Broadway
New York, New York 10019

**Re: In re the Application of The Bank of New York Mellon
(Index No. 651786/2011)**

Dear Matt:

During last week's deposition of Brian Lin, it became apparent that Mr. Lin did not produce several documents responsive to the September 14, 2012 subpoena issued to RRMS Advisors, LLC ("RRMS"). You assured me that any responsive and relevant documents to that subpoena that had not already been produced would be.

Specifically, it appears that the following documents have not yet been produced:

1. A copy of *all* facts, data and other documents Mr. Lin relied upon in forming the opinions in his reports, including but not limited to certain [REDACTED] [REDACTED] [REDACTED]. It is also not at all clear that RRMS and/or BNY Mellon has produced all of the information Mr. Lin or his staff [REDACTED] [REDACTED]. (responsive to Document Request No. 2 of the Steering Committee's subpoena to RRMS);
2. All drafts to both reports prepared by Mr. Lin and RRMS, , as well as all notes and calculations made by Mr. Lin (responsive to Document Request No. 3 of the Steering Committee's subpoena to RRMS); and
3. All time records, invoices and bills evidencing payment for all work performed by Mr. Lin and RRMS in connection with BNY Mellon's retention of Mr. Lin and RRMS (responsive to Document Request No. 5 of the Steering Committee's subpoena to RRMS).

To the extent that any of these documents were produced in the Trustee's November 1, 2011 voluntary production as "documents that BNY Mellon considered in connection with its decision



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to enter into the Settlement” or as “documents provided to experts who issued reports to BNY Mellon in connection with the Settlement,” please identify those documents by Bates number.

Mr. Lin also acknowledged during his deposition that he [REDACTED]

[REDACTED] Please produce these [REDACTED] to the Steering Committee as well, as they are highly relevant to the methodologies and opinions Mr. Lin employed in the two reports he prepared in this case.

Finally, please produce the [REDACTED]

The Steering Committee also reserves its right to depose Mr. Lin for an additional day based on his failure to produce all relevant and responsive documents to the September 14, 2012 subpoena before his deposition took place on October 16 and 17, 2012.

Please produce these documents within (7) days from the date of this letter. In addition, please let us know when you are available to confer on the documents requested and identified in Mr. Reilly’s September 24, 2012 and October 8, 2012 letters pertaining to the depositions of Jason Kravitt and Loretta Lundberg.

Sincerely,



Michael A. Rollin