

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

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In the Matter of the application of	:	
	:	Index No. 651786/2011
THE BANK OF NEW YORK MELLON (as Trustee under Various Pooling and Servicing Agreements and Indenture Trustee under various Indentures), <i>et al.</i>	:	Hon. Kapnick, J.
	:	
Petitioners,	:	<u>NOTICE OF MOTION</u>
For an order, pursuant to C.P.L.R. 7701, seeking judicial Instructions and approval of a proposed settlement	:	

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PLEASE TAKE NOTICE that upon the annexed affidavit of William Frey, dated May 28, 2013, the exhibits attached thereto, and all the prior pleadings and proceedings had herein, nonparty William Frey (“Frey”) will move this Court before Motion Submission Part, Room 130 located at 60 Centre Street, New York, New York 10007, on the 6th day of June 2012, at 9:30 AM, or as soon thereafter as can be heard for an Order, pursuant to Section 2304(a) of the New York Civil Practice Law and Rules: (a) modifying a trial subpoena served upon Frey by Reilly Pozner LLP, counsel for certain AIG Entities, so that the documents demanded by the trial subpoena shall be produced in advance of Frey’s trial testimony to Reilly Pozner rather than delivered to the Court on the date of Frey’s trial testimony; and (b) requiring the AIG Entities represented by Reilly Pozner to pay all expenses incurred by Frey in connection with his compliance with the Trial Subpoena, including reasonable legal fees.

PLEASE TAKE FURTHER NOTICE that these papers have been served on you at least eight days before the motion is scheduled to be heard. You must serve your answering papers

and any notice of cross-motion with supporting papers, if any, on or before June 4, 2013, two days before the scheduled return date of the motion.

Dated: New York, New York
May 28, 2013

Respectfully submitted,

PARK & JENSEN LLP

By: /s/ Robert Knuts
Robert Knuts

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New York, NY 10017
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Attorneys for Non-party William Frey