

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: Kapnick, J.

**AFFIRMATION OF  
MICHAEL A. ROLLIN  
IN SUPPORT OF  
ORDER TO SHOW  
CAUSE REGARDING  
EXCLUSION OF  
EVIDENCE AND  
TESTIMONY FROM  
TRIAL**

I, Michael A. Rollin, hereby affirm under the penalty of perjury that the following is true and correct:

1. I am a member of the Bar of the State of New York and of Reilly Pozner LLP, counsel for the AIG entities in this matter. I have personal knowledge of the facts set forth below.

2. AIG is one of the Respondents in this matter that has submitted an objection to the proposed settlement. I submit this Affirmation in support of the Respondents' order to show cause why the Court should not exclude certain evidence, testimony, and argument from the trial, including the following:

- a. precluding unsworn testimony by counsel-witnesses;
- b. precluding testimony and evidence from the Inside Institutional Investors on topics previously blocked in discovery;

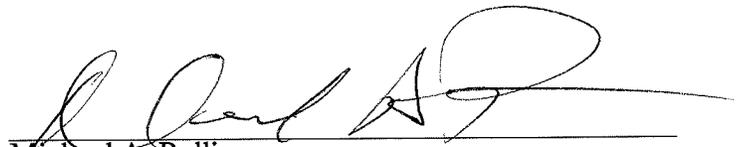
- c. precluding argument that all certificateholders not participating in this proceeding support the settlement; and
- d. awarding such other and further relief as the Court may deem just and proper.

3. There was no scheduled pretrial conference in this matter. On the May 29, 2013 conference call with the parties, the Court indicated that it would hear motions in limine on the first day of trial – June 3, 2013.

4. Due to the commencement of trial on June 3, 2013, Respondents respectfully request that this matter be considered on an expedited basis.

5. No prior application for this specific relief has been made in this Court or in any other court.

Dated this 31st day of May 2013.

  
Michael A. Rollin