

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),

Petitioner,

-against-

AMERICAN INTERNATIONAL GROUP, INC., AMERICAN GENERAL ASSURANCE COMPANY, AMERICAN GENERAL LIFE AND ACCIDENT INSURANCE COMPANY, AMERICAN GENERAL LIFE INSURANCE COMPANY, AMERICAN GENERAL LIFE INSURANCE COMPANY OF DELAWARE, AMERICAN HOME ASSURANCE COMPANY, AMERICAN INTERNATIONAL LIFE ASSURANCE COMPANY OF NEW YORK, CHARTIS PROPERTY CASUALTY COMPANY, CHARTIS SELECT INSURANCE COMPANY, COMMERCE AND INDUSTRY INSURANCE COMPANY, FIRST SUNAMERICA LIFE INSURANCE COMPANY, LEXINGTON INSURANCE COMPANY, NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, NEW HAMPSHIRE INSURANCE COMPANY, SUNAMERICA ANNUITY AND LIFE ASSURANCE COMPANY, SUNAMERICA LIFE INSURANCE COMPANY, THE INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA, THE UNITED STATES LIFE INSURANCE COMPANY IN THE CITY OF NEW YORK, THE VARIABLE ANNUITY LIFE INSURANCE COMPANY, and WESTERN NATIONAL LIFE INSURANCE COMPANY (collectively "AIG") (proposed intervenors),

Respondents,

for an order pursuant to CPLR § 7701 seeking judicial instructions and approval of a proposed settlement.

Index No. 651786/2011

Assigned to: Kapnick, J.

**AFFIRMATION OF
MICHAEL A. ROLLIN**

MICHAEL A. ROLLIN, an attorney duly licensed to practice law in the State of New York, affirms under penalties of perjury and says:

1. I am a member of Reilly Pozner LLP, attorneys of record for proposed intervenors AIG in the above-captioned action. I am familiar with the proceedings in

this case and make this affidavit in support of AIG's application to admit Daniel M. Reilly and Michael T. Kotlarczyk of the firm of Reilly Pozner LLP in Denver, Colorado as counsel *pro hac vice* to represent AIG in this matter.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in 2010.

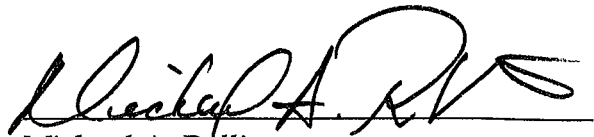
3. I am a partner at Reilly Pozner LLP, licensed to practice in New York and Colorado (among other jurisdictions). Messrs. Reilly and Kotlarczyk are both members of the firm and I know from personal experience in working with them that they are attorneys of the highest caliber and integrity.

4. As evidenced by the respective Certificates of Good Standing attached to their affidavits, Messrs. Reilly and Kotlarczyk are active members in good standing of the Bar of the State of Colorado, having been admitted to practice law in Colorado on October 23, 1981, and May 24, 2011, respectively.

5. Each of their affidavits states that (a) he is familiar with, and agrees to be bound by, the standards of professional conduct imposed upon members of the New York bar, including the rules of court governing the conduct of attorneys and the Disciplinary Rules of the Code of Professional Responsibility; (b) he acknowledges and agrees that he shall be subject to the jurisdiction of the courts of the State of New York with respect to any acts occurring during the course of his participation in this matter; (c) there are no disciplinary proceedings pending against him in the State of Colorado or

in any other jurisdiction, nor have there ever been any such proceedings brought against him in any jurisdiction; and (d) to the best of their recollections, neither Mr. Reilly nor Mr. Kotlarczyk have previously been admitted *pro hac vice* in this Court.

WHEREFORE, it is respectfully requested that the application to admit Daniel M. Reilly and Michael T. Kotlarczyk, *pro hac vice* to represent AIG in the above-captioned matter, together with my firm, be granted.



Michael A. Rollin

Affirmed this 8th day of August, 2011.