

**Exhibit A to the Affirmation of
Matthew D. Ingber dated January 28, 2013**

Exhibit A contains materials that have been designated Confidential pursuant to the Court's Protective Order dated June 14, 2012. A copy of Exhibit A has been delivered to the Court and served on all parties of record.

**Exhibit B to the Affirmation of
Matthew D. Ingber dated January 28, 2013**

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**Exhibit C to the Affirmation of
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**Exhibit D to the Affirmation of
Matthew D. Ingber dated January 28, 2013**

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**Exhibit E to the Affirmation of
Matthew D. Ingber dated January 28, 2013**

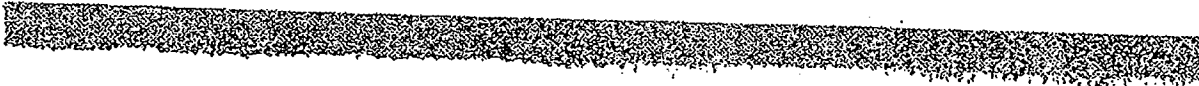
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**Exhibit F to the Affirmation of
Matthew D. Ingber dated January 28, 2013**

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**Exhibit G to the Affirmation of
Matthew D. Ingber dated January 28, 2013**

ORDER TO SHOW CAUSE FOR AN ORDER PURSUANT TO CPLR §7701
[A-50-A-52]



001

1121493-003
At IAS Part 10 of the Supreme Court
of the State of New York, held in and
for the County of New York, at the
Courthouse, 60 Centre Street, New
York, New York, on the 21 day of
January 1998

11-1-1998
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Present: Hon. B. Shainswit, Justice

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

In the Matter of the Application of

IBJ SCHRODER BANK & TRUST COMPANY
(not in its individual capacity but in its capacity as Trustee
under a Trust Agreement dated as of December 21, 1985
among Resources Satellite Corp., J. Henry Schroder Bank
& Trust Company and the Beneficiaries thereunder),

Index No. 98101580

IAS Part 10
(Shainswit, J.)

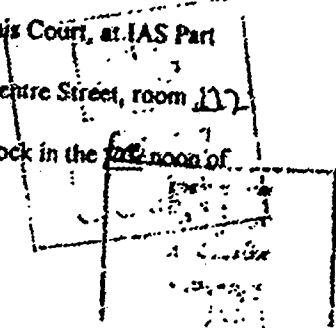
ORDER TO SHOW CAUSE

Petitioner,

for an order, pursuant to CPLR § 7701,
For a Construction of an Indenture and
Approval of a Proposed Settlement.

Upon reading and filing the annexed Verified Petition of Petitioner IBJ

SCHRODER BANK & TRUST COMPANY ("IBJ Schroder" or the "Investor Trustee"), dated
January 14, 1998 and the exhibits thereto, the Affirmation of John S. Willems, Esq., sworn to
January 21, 1998, and the Memorandum of Law submitted in support of the application for an
order granting judgment in favor of IBJ Schroder on its Petition ~~for~~ the Beneficiaries of the Trust
Agreement, dated as of December 21, 1985 among Resources Satellite Corp. and J. Henry
Schroder Bank & Trust Company, or their attorneys, show cause before this Court, at IAS Part
10 to be held in and for the County of New York, at the Courthouse, 60 Centre Street, room 112
New York, New York, on the 21 day of April, 1998, at 12:00 o'clock in the forenoon of



that day, or as soon thereafter as counsel can be heard, why an order should not be made, pursuant to CPLR § 7701, granting judgment in favor of IBI Schroder on its Petition as follows (capitalized terms are as defined in the Petition)

- (a) declaring that under the terms of the Investor Trust Agreement, the Investor Trust and Trust Estate have not terminated and that IBI Schroder, as Investor Trustee, continues to be subject to the Investor Trust Agreement;
 - (b) declaring that under the terms of the Investor Trust Agreement, IBI Schroder, as Investor Trustee, had the authority to commence the Satellite Litigation;
 - (c) declaring that the Investor Trust Agreement does not permit IBI Schroder to split the Satellite Litigation and assign it to individual Beneficiaries;
 - (d) declaring that under the terms of the Investor Trust Agreement, IBI Schroder may not settle the Satellite Litigation absent instructions from the Court;
 - (e) approving the Proposed Settlement embodied in the Settlement Agreement and directing IBI Schroder to consummate the Settlement Agreement immediately;
 - (f) declaring that the Beneficiaries be bound by the Settlement Agreement and that IBI Schroder will not, by virtue of continued service as Investor Trustee under the Investor Trust Agreement or of actions taken in seeking or pursuant to the order in this proceeding, (i) be subject to claims for damages or otherwise based on alleged breaches of the Investor Trust Agreement or its duties to the Beneficiaries thereunder or (ii) impair the rights it has under the Investor Trust Agreement to be compensated the fees and expenses it incurs in discharging its duties as Investor Trustee;
 - (g) retaining the jurisdiction of the Court with respect to the Investor Trust and the final disposition of its assets;
 - (h) for such other and further relief as this Court deems just and proper;
- Objections or answering affidavits, if any, shall be served upon Petitioner's

counsel, White & Case LLP, 1155 Avenue of the Americas, New York, New York, 10036 (Attn: Hyon Kim, Esq.), on or before the 13 day of April, 1998;

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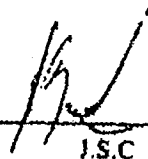
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Reply papers and affidavits, if any, shall be served by Petitioner upon any party submitting objections or answering affidavits on or before the 20 day of April, 1998;

Service of a copy of this order and the papers upon which it is based, be made on or before the 30 day of MARCH, 1998 by personally serving copies thereof on the in the list designated Exhibit E Beneficiaries, and that said service be deemed good and sufficient service thereof.

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ENTER:



J.S.C

**PROOF OF SERVICE
MUST BE SUBMITTED
TO COURT ON THE
RETURN DATE**

**Exhibit H to the Affirmation of
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