

**Exhibit 19**  
**to**  
**Affidavit of Daniel M. Reilly**  
**in Support of Joint Memorandum of**  
**Law in Opposition to Proposed Settlement**

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

3  
4 In the Matter of the )  
Application of )  
5 )  
THE BANK OF NEW YORK MELLON )  
6 (As Trustee under various ) Index No.  
Pooling and Servicing ) 651786/2011  
7 Agreements and Indenture )  
Trustee under various )  
8 Indentures), et al., )  
 )  
9 Petitioners, )  
 )  
10 for an order, pursuant to )  
C.P.L.R. 7701, seeking )  
11 judicial instructions and )  
approval of a proposed )  
12 settlement. )  
----- )

13  
14  
15  
16  
17  
18 VIDEOTAPED DEPOSITION OF DEBRA BAKER  
19 New York, New York  
20 Friday, January 11, 2013  
21

22  
23 Reported by:  
24 KRISTIN KOCH, RPR, RMR, CRR, CLR  
25 JOB NO. 56219

1 businesses for the company, and in the last  
2 four years moved over to corporate trust.

3 Q. Do you remember the year, roughly,  
4 when you first moved over to corporate trust?

5 A. I believe it was -- yes, I do  
6 remember, because it was right before the  
7 market downturn, so it was probably around the  
8 summer of 2008.

9 Q. When you say "the market downturn"  
10 there, what do you mean?

11 A. When Lehman went bankrupt and all  
12 that activity happened.

13 Q. After you moved over to corporate  
14 trust, did you try to follow that market  
15 downturn in the press or in the financial  
16 industry?

17 A. I think everyone at that point, you  
18 know, was following the market downturn and it  
19 was in the press very readily every day and so  
20 I would say yes from that perspective, of  
21 course, I was, you know, following it, like  
22 most individuals.

23 Q. Most individuals who work in --

24 A. Work in financial services.

25 Q. And what would you do to follow it?

1 What does that mean for you?

2 A. You know, just keeping up on what's  
3 happening, reading the publications and  
4 understanding -- at that point I was the chief  
5 administration officer in corporate trust  
6 working for Scott Posner, so there was a lot of  
7 activity around setting up war rooms, we called  
8 them at that time, just to make sure we  
9 understood any of our exposures.

10 Q. You said that you were chief  
11 administration officer in the corporate trust  
12 division; is that correct?

13 A. When I initially came over in 2008,  
14 correct.

15 Q. And can you define for me what that  
16 role was, what your responsibilities were?

17 A. Sure. My responsibilities were  
18 around managing a couple of the groups, mostly  
19 the product management group which is in charge  
20 of strategic direction. The second area was  
21 around training and development, and the third  
22 was oversight over some of the financial  
23 functions.

24 Q. When you say strategic direction for  
25 product management, what does that mean?

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17 THE VIDEOGRAPHER: The time is

18 9:51 a.m. We are off the record.

19 (Recess was taken from 9:51 to  
20 9:59.)

21 THE VIDEOGRAPHER: The time is

22 9:59 a.m. We are on the record.

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[Redacted text block containing multiple lines of blacked-out content]

[REDACTED]

10 Q. Prior to summer of 2011, roughly,  
11 Mr. Buechele reported to you; correct?

12 A. Correct.

13 Q. Did you know at the time that he was  
14 doing work related to the proposed settlement?

15 A. I don't recall having conversations  
16 with Jason on the proposed settlement.

17 Q. Did you know at the time that he was  
18 doing work on the proposed settlement?

19 A. Not that I recall.

20 Q. And there are no conversations you  
21 had with him that you remember sitting here  
22 today about the proposed settlement?

23 A. Correct.

24 Q. Since June of 2011 have you had  
25 conversations with anyone within Bank of New

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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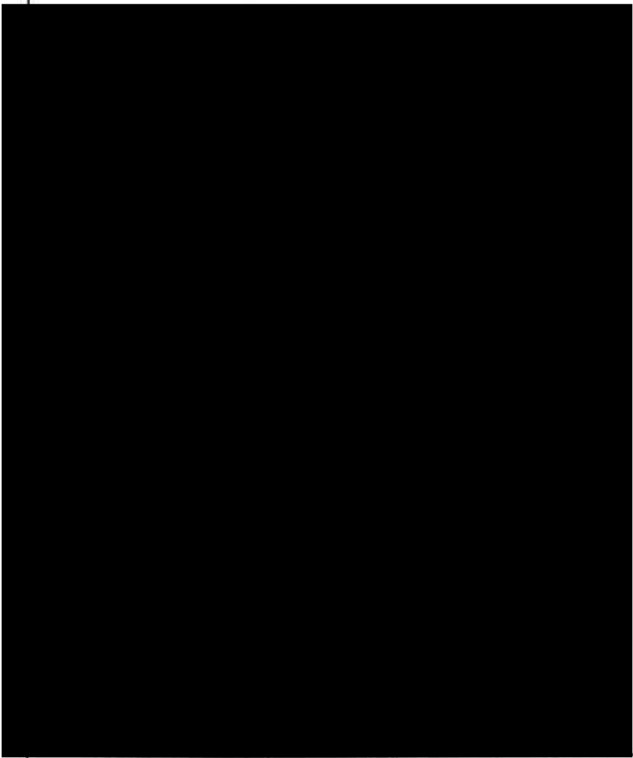
[REDACTED]

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- [REDACTED]



3 MS. PENNINGTON: We can take a  
 4 break. I will see if I have anything else.  
 5 MR. INGBER: Thanks.  
 6 THE VIDEOGRAPHER: The time is  
 7 12:05 p.m. This is the end of tape  
 8 number 2. We are off the record.  
 9 (Recess was taken from 12:05 to  
 10 12:09.)  
 11 THE VIDEOGRAPHER: The time is  
 12 12:09 p.m. This is the start of tape  
 13 number 3. We are on the record.  
 14 BY MS. PENNINGTON:  
 15 Q. I am just going to hand you what's  
 16 been previously entered as Deposition  
 17 Exhibit 524.  
 18 Do you see in the right hand of the  
 19 caption this is a document that says Summons  
 20 With Notice near the top?  
 21 A. Yes.  
 22 Q. And on the left-hand side it lists a  
 23 plaintiff and some defendants. Do you see  
 24 that?  
 25 A. Yes.

1 Q. And the plaintiff is JPMorgan  
 2 Mortgage Acquisition Trust, Series 2006-WMC4,  
 3 by the Bank of New York Mellon, solely in its  
 4 capacity as the securities administrator. Do  
 5 you see that?  
 6 A. Yes.  
 7 Q. And the date across the top, the  
 8 filing date is 12-20-2012 across the top of the  
 9 document?  
 10 A. Yes.  
 11 (Continued on next page to include  
 12 jurat.)  
 13  
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1 Q. Do you have any personal knowledge  
 2 about this Summons With Notice?  
 3 A. No.  
 4 MS. PENNINGTON: I have no further  
 5 questions.  
 6 MR. INGBER: Thank you. No  
 7 questions.  
 8 THE VIDEOGRAPHER: The time is  
 9 12:10 p.m. We are off the record.  
 10 (Time noted: 12:10 p.m.)

*Debra Baker* 3/22/2013

DEBRA BAKER

Subscribed and sworn to before me  
 this 22<sup>nd</sup> day of March 2013.

*Jason D. Kuklis*

JASON D. KUKLIS  
 Notary Public, State of New York  
 Qualified in Orange County  
 Reg. No. 01KU6229448  
 My Commission Expires 10-12-2014

1 ERRATA SHEET FOR THE TRANSCRIPT OF:

2 Case Name: In re: Bank of New York Mellon

Dep. Date: January 11, 2013

3 Deponent: Debra Baker

4 CORRECTIONS:

| 5  | Pg. | Ln. | Now Reads       | Should Read         | Reason                         |
|----|-----|-----|-----------------|---------------------|--------------------------------|
| 6  | 3   | 20  | <u>for Bank</u> | <u>for The Bank</u> | <u>party name</u>              |
| 7  | 5   | 21  | <u>the Bank</u> | <u>The Bank</u>     | <u>party name</u>              |
| 8  | 5   | 24  | <u>the Bank</u> | <u>The Bank</u>     | <u>party name</u>              |
| 9  | 26  | 25  | <u>Resource</u> | <u>Resourced</u>    | <u>incorrect transcription</u> |
| 10 | 22  | 12  | <u>analysts</u> | <u>Analytics</u>    | <u>incorrect transcription</u> |
| 11 |     |     |                 |                     |                                |
| 12 |     |     |                 |                     |                                |
| 13 |     |     |                 |                     |                                |
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| 16 |     |     |                 |                     |                                |

17  
18 *Debra Baker* 4/11/2013

19 Signature of Deponent

20 SUBSCRIBED AND SWORN BEFORE ME

21 THIS 1st DAY OF April, 2013.

22  
23 *Janet Ramkaran*  
24 (Notary Public) MY COMMISSION EXPIRES: 1/18/2014

JANET RAMKARAN  
Notary Public, State of New York  
No. 01RA5022887  
Qualified in Queens County  
Commission Expires

# MAYER • BROWN

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New York, New York 10019-5820

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**Matthew D. Ingber**  
Direct Tel +1 212 506 2373  
Direct Fax +1 212 849 5973  
mingber@mayerbrown.com

January 24, 2013

## VIA ELECTRONIC MAIL

TO: STEERING COMMITTEE

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

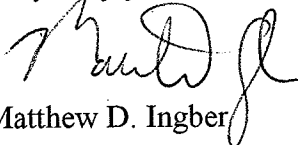
Dear Counsel:

Pursuant to Paragraph 2(c) of the protective order signed by the parties and so ordered by Justice Kapnick on June 14, 2012 (the "Protective Order"), The Bank of New York Mellon designates the following portions of the deposition of Debra Baker as "Confidential," as it is defined in the Protective Order:

| <b>January 11, 2013 Transcript<br/>Page/Line Designation</b> |
|--|
| 8:3-33:16  |
| 33:23-54:11  |
| 54:20-89:3   |
| 89:16-107:2  |

Please feel free to call or email me if you have any questions.

Very truly yours,

  
Matthew D. Ingber

Mayer Brown LLP  
1675 Broadway  
New York, New York 10019-5820

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April 26, 2013

**VIA ELECTRONIC MAIL**

Michael A. Rollin  
Reilly Pozner LLP  
1900 Sixteenth Street  
Suite 1700  
Denver, CO 80202

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

Dear Mike:

I am writing in response to your March 11, 2013 and April 17, 2013 letters regarding confidentiality designations of discovery materials. In addition to the materials we agreed to de-designate per our April 3, 2013 and April 22, 2013 letters, we will also remove confidentiality designations from the deposition transcript excerpts listed in Exhibit A (attached). The remaining excerpts should retain their "confidential" designations in accordance with section 1(d) of the Protective Order.

Please call my colleague, Chris Houpt, or me if you have any questions.

Very truly yours,

  
Matthew D. Ingber

cc: All counsel



Mayer Brown LLP

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# EXHIBIT A

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| <b>Daines</b> |
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| 61:23-120:10  |

| <b>Lin</b>    |
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| 173:14-177:12 |
| 178:25-181:22 |
| 186:5-189:16  |
| 243:11-260:9  |
| 261:22-339:22 |
| 358:18-358:22 |
| 359:9-377:7   |
| 380:22-399:25 |
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| <b>Adler</b>  |
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| <b><u>Kravitt</u></b> |
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| <b>Lundberg</b> |
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| <b>Bailey</b> |
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| 220:9-221:25  |
| 222:8-223:2   |
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| 307:5-309:21  |
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| <b>Crosson</b> |
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| 22:14-24:9     |
| 81:25-83:16    |
| 83:21-84:20    |
| 86:9-11        |
| 86:23-87:3     |
| 88:2-98:5      |
| 100:18-103:19  |
| 105:11-113:15  |
| 118:17-146:2   |
| 146:12-149:13  |
| 150:22-156:21  |
| 158:19-162:4   |
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| 184:3-187:7    |
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| 205:5-206:15   |
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| 209:13-210:19  |
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| 226:3-227:6   |
| 227:18-235:24 |
| 237:10-245:14 |
| 245:24-250:20 |

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| <b><u>Chapman</u></b> |
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| 285:4-287:11          |
| 292:16-294:22         |
| 319:25-322:4          |
| 324:4-325:23          |

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| <b><u>Chavez</u></b> |
| 13:5-16:13           |
| 32:11-35:6           |
| 38:5-41:23           |
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| 245:2-246:16  |
| 262:15-266:10 |
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| <b><u>Baker</u></b> |
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| 8:23-8:25           |
| 9:1-10:8            |
| 11:16-11:22         |
| 12:20-15:8          |
| 15:9-16:9           |
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| 74:16-75:18         |
| 76:2-76:15          |
| 83:7-84:16          |
| 97:1-98:20          |

|                     |
|---------------------|
| <b><u>Sabry</u></b> |
| Entire Transcript   |

|                       |
|-----------------------|
| <b><u>Bingham</u></b> |
| Entire Transcript     |