

Exhibit C

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), BlackRock Financial Management Inc. (intervenor), Kore Advisors, L.P. (intervenor), Maiden Lane, LLC (intervenor), Maiden Lane II, LLC (intervenor), Maiden Lane III, LLC (intervenor), Metropolitan Life Insurance Company (intervenor), Trust Company of the West and affiliated companies controlled by The TCW Group, Inc. (intervenor), Neuberger Berman Europe Limited (intervenor), Pacific Investment Management Company LLC (intervenor), Goldman Sachs Asset Management, L.P. (intervenor), Teachers Insurance and Annuity Association of America (intervenor), Invesco Advisers, Inc. (intervenor), Thrivent Financial for Lutherans (intervenor), Landesbank BadenWuerttemberg (intervenor), LBBW Asset Management (Ireland) plc, Dublin (intervenor), ING Bank fsb (intervenor), ING Capital LLC (intervenor), ING Investment Management LLC (intervenor), New York Life Investment Management LLC (intervenor), Nationwide Mutual Insurance Company and its affiliated companies (intervenor), AEGON USA Investment Management LLC, authorized signatory for Transamerica Life Insurance Company, AEGON Financial Assurance Ireland Limited, Transamerica Life International (Bermuda) Ltd., Monumental Life Insurance Company, Transamerica Advisors Life Insurance Company, AEGON Global Institutional Markets, plc, LIICA Re II, Inc., Pine Falls Re, Inc., Transamerica Financial Life Insurance Company, Stonebridge Life Insurance Company, and Western Reserve Life Assurance Co. of Ohio (intervenor), Federal Home Loan Bank of Atlanta (intervenor), Bayerische Landesbank (intervenor), Prudential Investment Management, Inc. (intervenor), and Western Asset Management Company (intervenor),

Petitioners,

-against-

WALNUT PLACE LLC, WALNUT PLACE II LLC,
WALNUT PLACE III LLC, WALNUT PLACE IV
LLC, WALNUT PLACE V LLC, WALNUT PLACE
VI LLC, WALNUT PLACE VII LLC, WALNUT
PLACE VIII LLC, WALNUT PLACE IX LLC,
WALNUT PLACE X LLC, WALNUT PLACE XI

Index No. 651786/2011

Assigned to: Kapnick, J.

SUBPOENA DUCES TECUM

LLC, POLICEMEN'S ANNUITY & BENEFIT FUND OF CHICAGO, THE WESTMORELAND COUNTY EMPLOYEE RETIREMENT SYSTEM, CITY OF GRAND RAPIDS GENERAL RETIREMENT SYSTEM, CITY OF GRAND RAPIDS POLICE AND FIRE RETIREMENT SYSTEM, TM1 INVESTORS, LLC, FEDERAL HOME LOAN BANK OF BOSTON, FEDERAL HOME LOAN BANK OF CHICAGO, FEDERAL HOME LOAN BANK OF INDIANAPOLIS, FEDERAL HOME LOAN BANK OF PITTSBURGH, FEDERAL HOME LOAN BANK OF SAN FRANCISCO, FEDERAL HOME LOAN BANK OF SEATTLE, V RE-REMIC, LLC, THE WESTERN AND SOUTHERN LIFE INSURANCE COMPANY, WESTERN-SOUTHERN LIFE ASSURANCE COMPANY, COLUMBUS LIFE INSURANCE COMPANY, INTEGRITY LIFE INSURANCE COMPANY, NATIONAL INTEGRITY LIFE INSURANCE COMPANY, FORT WASHINGTON INVESTMENT ADVISORS, INC. on behalf of FORT WASHINGTON ACTIVE FIXED INCOME LLC, CRANBERRY PARK LLC, and CRANBERRY PARK II LLC

Proposed Intervenor-Respondents,

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

TO: [Name of recipient]

YOU ARE HEREBY COMMANDED to produce to an electronic repository to be agreed upon by the parties and notified to you, not later than 45 days from the date of this notice, the documents described in Schedule A.

Dated: New York, New York
August __, 2011

GRAIS & ELLSWORTH LLP

By: _____

David J. Grais
Owen L. Cyrulnik
Leanne M. Wilson

40 East 52nd Street
New York, New York 10022
(212) 755-0100
(212) 755-0052 (fax)

Attorneys for Proposed Intervenor-
Respondents

**Schedule A to Subpoena to
[Name of recipient]**

DEFINITIONS AND INSTRUCTIONS

As used in this Subpoena, the following terms have the following meanings, whether or not those terms are capitalized.

A. “Document” is used in its broadest sense and means writings, books, records, memoranda, papers, films, recordings, accounts, drawings, graphs, charts, photographs, electronically stored information, metadata, computer records, emails, calendars, and other data compilations from which information can be obtained, translated, and/or transcribed, if necessary, through detection devices into reasonably usable form. Non-identical copies of any such materials are separate documents. Documents are non-identical if one contains any comment, notation, or marking that the other does not. A draft or preliminary form of a document is also a non-identical document.

B. “Including” means including but not limited to.

C. “Possession, custody, or control” means in your physical possession or as to which you have the right or practical ability to secure or compel the production of the document (or a copy) from another person, affiliate, corporation, partnership, or other entity that has physical possession thereof, including any subsidiary entity and any director, officer, employee, inside or outside counsel, or agent of you or of any subsidiary entity of you.

D. “Related to” or “relating to” means containing any information about, constituting, concerning, evidencing, mentioning, discussing, summarizing, describing, referring to, arising out of, created in connection with, or involving the subject specified.

E. “You” and “your” mean each entity to which this Notice to Produce is addressed and any parents, subsidiaries, affiliates, officers, employees, and agents of any of them.

F. “Settlement Amount Opinion” means the “Opinion Concerning Contemplated Settlement Amount for 530 Trusts” dated June 7, 2011, from RRMS Advisors to The Bank of New York Mellon.

G. For documents on paper, please produce the originals or duplicates or images of the originals. Please produce the documents in a way that preserves all information about how the documents were kept (for example, which documents were kept in which folder and the name of each folder, which documents were stapled or clipped together, etc.).

H. The following instructions apply to the production of electronic documents.

(1) Responsive documents should be produced in the form of black-and-white, single-page, 300 DPI, Group IV .tiff images, with each .tiff image file named with the corresponding Bates number, and with image and data load files compatible with the most recent versions of Concordance, Summation and iPro/Opticon. The format for delivery of load files will be .DAT; .OPT or .LOG; and .dii files.

(2) For each document, the data load file should include information about the custodian or source from which the document was collected; the file path of the document; text that is extracted from the electronic file, not generated as an OCR file from the .tiff image(s); as well as: (i) the beginning Bates number (referring to the first page of the document); (ii) the ending Bates number (referring to the last page of the document); (iii) each document's MD5 Hash information; and, in the case of emails with attachments, (iv) the beginning attachment range number(s) and (v) the ending attachment range number(s), where the "attachment range" records the relationship of the emails to their attachments. The attachment range should be recorded from the first page of the email (i.e., first document in the attachment range) to the last page of the last document (i.e., the last document in the attachment range).

(3) For emails, the load file should also include header information including: (i) the custodian or other source from which the email was gathered; (ii) the individual(s) to whom the communication was directed ("To"); (iii) the author of the communication ("From"); (iv) the recipient(s) of the communication (including all "Cc"s and "Bcc"s); (v) the "Subject" or "Re" line of the communication; (vi) the date and time sent; (vii) the path to the documents for the documents produced in native format; (viii) the original name of all files; (ix) the file extension of each file; (x) the number of pages of each document; and (xi) the full internet header for each email. For attachments to the emails, the load file should also include the last modified date.

(4) For images of hard copy documents, the load file should include information about the custodian or other source from which the document was gathered; the beginning Bates number (referring to the first page of the document); the ending Bates number (referring to the last page of the document); and the beginning attachment range, ending attachment range, and page count. For hard copy documents, the load file should also contain text generated by OCR software. The format for delivery of the text/OCR file is a .TXT file corresponding to the beginning Bates number of each document and placed in a folder entitled either "Text" or "OCR."

(5) Microsoft Excel files (and other electronic spreadsheet files); audio files (e.g., .mp3, .mpa, .wav, .wma); video files (e.g., .mpg, .mp4, .wmv, .flv, .jpg); and other files that cannot be converted to .tiff image format should be produced in native format, including all formulae within the cells of the spreadsheet, any hidden rows or columns, and all other metadata contained in the file. All files produced in native format will have a corresponding single page .tiff place holder stating "Document Produced in Native Format." Each Native File is to be named after the beginning Bates number.

I. If you object to the production of any document on grounds of privilege or other immunity from production, please identify the document(s) withheld by: author(s),

recipient(s), date, subject matter, number of pages, and type (e.g., letter, memorandum), and state the grounds on which you object to the production of that document.

DOCUMENTS TO BE PRODUCED

1. The Settlement Amount Opinion, including all drafts or earlier versions thereof and all documents reviewed, read, or otherwise used in the preparation thereof, including all documents that reflect or embody any analysis done by Brian Lin and all other personnel of RRMS Advisors.
2. Detailed resumes of Brian Lin and all other personnel of RRMS Advisors who worked in any way on the Settlement Amount Opinion.
3. The “All Consortium Deals’ summarized in the spreadsheet provided by the Investor Group” described on page 1 of the Settlement Amount Opinion, including all drafts or earlier versions thereof and all documents reviewed, read, or otherwise used in the preparation thereof.
4. The “forensic underwriting review performed by an independent third party” described on page 1 of the Settlement Amount Opinion; sampling protocols used in the review; the findings of the loan reviewers on each loan reviewed; all underwriting standards or guidelines used in reviewing loans; any reports of the results of that review, including all drafts or earlier versions thereof; and all documents reviewed, read, or otherwise used in the review or in the writing of any report thereof.
5. The “Presentation to Gibbs & Bruns’ dated April 11, 2011, provided by BofA” described on page 4 of the Settlement Amount Opinion, including all drafts or earlier versions thereof and all documents reviewed, read, or otherwise used in the preparation thereof.