

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") (objectors-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.

NOTICE OF INTENTION
TO APPEAR AND
OBJECT

PLEASE TAKE NOTICE that, upon the petition of the Trustee, this Court's Order to Show Cause, this Court's Order of August 5, 2011 modifying the Order to Show Cause, the notice posted by the Trustee on www.cwrmbssettlement.com stating that any objection filed on

or before August 30, 2011 will be considered timely by the Trustee, and all previous papers filed heretofore and herein, AIG hereby files its notice of intention to appear and object at the hearing before this Court at IAS Part 39, to be held at the Courthouse, 60 Centre Street, New York, New York, on November 17, 2011 at 2:15 p.m., or at such time as a trial or hearing on this matter is held. As grounds therefor, AIG states that it does not have sufficient information at this time to fully evaluate the settlement and that it will be necessary to conduct discovery to determine the actual facts behind BoNY's proposal. AIG hereby incorporates by reference the arguments and positions set forth in its Verified Petition to Intervene, Doc. No. 131. The filing of this objection in no way alters the relief AIG requests in its Verified Petition to Intervene. AIG reserves all of its rights, including the right to seek and participate in discovery concerning the proposed settlement.

WHEREFORE, AIG respectfully gives its notice of intention to appear and object at the hearing before this Court at IAS Part 39, to be held at the Courthouse, 60 Centre Street, New York, New York, on November 17, 2011 at 2:15 p.m., or at such time as a trial or hearing on this matter is held.

DATED: August 30, 2011

REILLY POZNER LLP

By: s/ Michael A. Rollin
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*Attorneys for American International
Group, Inc., et al.*

CERTIFICATE OF SERVICE

This is to certify that on this 30th day of August 2011, a true and correct copy of the above and foregoing instrument was properly forwarded to the following counsel of record as indicated below:

Via NYSCEF & Overnight Delivery

Matthew D. Ingber
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Counsel for The Bank of New York Mellon

Via NYSCEF

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Dated: August 30, 2011

s/ Michael A. Rollin
Michael A. Rollin