

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

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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-

[VARIOUS PROPOSED INTERVENORS],

Respondents,

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

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Index No. 651786/2011

Assigned to: Kapnick, J.

**OBJECTION IN THE  
FORM OF A REQUEST  
FOR MORE  
INFORMATION**

Blue Mountain Credit Alternatives Master Fund, LP (“Blue Mountain”), by and through its attorneys, Peter N. Tsapatsaris, LLC and Talcott Franklin P.C.<sup>1</sup> (the “Attorneys”), submits this Objection in the Form of a Request for More Information (the “Request”), pursuant to New York Supreme Court Orders dated June 29, 2011 and August 5, 2011 (the “Court Orders”), to protect investments it holds in CWALT 2006-OA2 and/or one or more of the trusts listed on Exhibit 2 to the Objection in the Form of a Request for More Information dated August 29, 2011 filed by the Attorneys (the “August 29 Request”) on behalf of the clients listed in Exhibit 1 to the August 29 Request (the “Clients”).

Blue Mountain hereby adopts and incorporates by reference as if fully set forth herein the August 29 Request in its entirety. Blue Mountain also agrees until further notice to be treated for purposes of service and other notification as one of the Clients.

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<sup>1</sup> *Pro hac vice* motion to be filed.

**RELIEF REQUESTED**

WHEREFORE, Blue Mountain respectfully requests that the Court allow it to obtain the additional information required to evaluate the Proposed Settlement Agreement and grant it such additional and further relief to which it may be entitled.

Dated: August 30, 2011

Respectfully Submitted,

/s Peter N. Tsapatsaris  
Peter N. Tsapatsaris (PT4269)  
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\*\* Licensed only in Washington (inactive) and Texas. Pro hac vice application to be submitted.

**CERTIFICATE OF SERVICE**

This is to certify that on this 30<sup>th</sup> 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, SDNY ECF, & Hand Delivery**

Matthew D. Ingber  
Mayer Brown LLP  
1675 Broadway  
New York, NY 10019  
*Counsel for The Bank of New York Mellon*

**Via NYSCEF and SDNY ECF**

All other parties, intervenors, proposed intervenors, and objectors.

Dated: August 30, 2011

Respectfully Submitted,

/s Peter N. Tsapatsaris  
Peter N. Tsapatsaris