FILED: NEW YORK COUNTY CLERK 02/12/2014

NYSCEF DOC. NO. 1048

INDEX NO. 651786/2011

RECEIVED NYSCEF: 02/12/2014

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), *et al.*,

JOINDER TO ORDER TO SHOW CAUSE SEEKING STAY OF ENTRY OF FINAL JUDGMENT

Index No. 651786/2011

Petitioners,

for an order, pursuant to C.P.L.R. § 7701, seeking judicial instructions and approval of a proposed settlement.

Objectors United States Debt Recovery VIII, LP, United States Debt Recovery X, LP, and United States Debt Recovery XI, LP (collectively, the "<u>U.S. Debt Recovery Entities</u>"), by their attorneys, Halperin Battaglia Raicht, LLP, each hereby join in and adopt as though set forth herein in its entirety, the Order to Show Cause filed by the AIG Entities dated February 4, 2014, and the Memorandum of Law in Support of Motion to Stay Entry of Final Judgment filed by the AIG Entities, dated February 4, 2014.

The U.S. Debt Recovery Entities respectfully request that this Court: (a) stay entry of final judgment so the Court can conduct further proceedings, as may be appropriate, to address all issues left open by the Court's January 31, 2014 Decision/Order/Judgment; and (b) granting respondents such other and further relief as the Court may deem just and proper.

Dated: New York, New York February 12, 2014

HALPERIN BATTAGLIA RAICHT, LLP Attorneys for Objectors U.S. Debt Recovery Entities 40 Wall Street – 37<sup>th</sup> Floor

New York, NY 10005 (212) 765-9100 /

Scott A Zilud

Donna H. Lieberman