FILED: NEW YORK COUNTY CLERK 01/14/2013

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INDEX NO. 651786/2011

Exhibit 6

MAYER * BROWN

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December 21, 2012

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 Douglas Chapman as "Confidential," as it is defined in the Protective Order:

December 11, 2012 Transcript Page/Line Designation					
8:25-11:8					
12:9-81:16					
82:9-83:11					
85:16-86:22					
91:8-106:16					
107:23-116:2					
116:20-130:6					
130:25-151:15					
152:6-180:9					
181:11-241:10					
241:20-292:6					
292:16-325:23					

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

Very truly yours,

Matthew D. Ingber

	Page 1				
1					
2	SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK				
3	X				
4	In the Matter of the Application of				
5	Index No. 651786/				
6	THE BANK OF NEW YORK MELLON				
7	(As trustee under various Pooling Assigned to Kapnick, J. and Servicing Agreements and				
8	Indenture Trustee under various Indentures), et al.,				
9	Petitioners,				
10	for an order purguant to C.D.I.D.				
11	for an order, pursuant to C.P.L.R. Rule 7701, seeking judicial instructions and approval of a proposed settlement.				
12	X				
13	* CONFIDENTIAL *				
14					
15	VIDEOTAPED DEPOSITION				
16	OF				
17	DOUGLAS CHAPMAN				
18	New York, New York				
19	Tuesday, December 11, 2012				
20					
21					
22					
23					
24	Reported by:				
25	ANNETTE ARLEQUIN, CCR, RPR, CCR, CLR JOB NO. 55549				

	Page 2		Page 4
1	_	1	_
2		2	APPEARANCES (Cont'd.)
3		3	TITT ETTRITITE ES (Cont.u.)
4	December 11, 2012	4	REILLY POZNER
5	9:11 a.m.	5	Attorneys for The Western and Southern
6	, , , , , , , , , , , , , , , , , , ,	6	Life Insurance Company and American
7	CONFIDENTIAL videotaped deposition of	7	International Group, et al.
8	DOUGLAS CHAPMAN, held at the offices of	8	1900 Sixteenth Street
9	Quinn Emanuel, 51 Madison Avenue, New York,	9	Denver, Colorado 80202
10		10	BY: LARRY POZNER, ESQ.
11		11	BY: MARITZA BRASWELL, ESQ.
12	Reporter, a Registered Professional	12	BY: MICHAEL A. ROLLIN, ESQ.
13	Reporter, a Certified Realtime Reporter, a	13	,
14		14	
15	<u> </u>	15	
16		16	
17		17	GIBBS & BRUNS
18		18	Attorneys for The Institutional Investors
19		19	1100 Louisiana
20		20	Houston, Texas 77002
21		21	BY: DAVID SHEEREN, ESQ.
22		22	
23		23	
24		24	
25		25	
	Page 3		Page 5
1		1	
2	APPEARANCES:	2	APPEARANCES (Cont'd.):
3		3	
4	DECHERT	4	WACHTELL LIPTON ROSEN & KATZ
5	Attorneys for Bank of New York Mellon and	5	Attorneys for Bank of America
6	the Witness	6	51 West 52nd Street
7	1095 Avenue of the Americas New York, New York 10036	7	New York, New York 10019
8	BY: HECTOR GONZALEZ, ESQ.	8	BY: CHARLES D. CORDING, ESQ.
10	B1. HECTOR GONZALEZ, ESQ.	9	
1	- and -	10	THE COTT TO ANYWAY
11	und	11	TALCOTT FRANKLIN
12	MAYER BROWN	12	Attorneys for Knights of Columbus, American Equity
13	Attorneys for Bank of New York Mellon and	13	Investment Life Insurance Company, et al., Blue
14	the Witness	14	Mountain Credit Alternatives Master Fund, LP and Stone
15	1675 Broadway	15	Creek LLC
16	New York, New York 10019	16	208 North Market Street
17	BY: CHRISTOPHER J. HOUPT, ESQ.	17	Dallas, Texas 75202
18		18	BY: SHERI DETERLING, ESQ.
19		19 20	(Telephonically)
20			ALCO DDESENT.
21		21 22	ALSO PRESENT:
22		23	DALE SWINDELL OLVS
23		24	DALE SWINDELL, CLVS
24 25		25	
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