

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.*

Petitioners,

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

Index No. 651786/2011

Assigned to: Kapnick, J.

**AFFIRMATION OF
MICHAEL A. ROLLIN
IN SUPPORT OF
ORDER TO SHOW
CAUSE WHY THE
COURT SHOULD NOT
CONTINUE THE
TRIAL FOLLOWING
THE SEPTEMBER
TRIAL DATES TO
ALLOW DISCOVERY
CONCERNING NEWLY
DISCLOSED
EVIDENCE**

I, Michael A. Rollin, hereby affirm under the penalty of perjury that the following is true and correct:

1. I am a member of the Bar of the State of New York and of Reilly Pozner LLP, counsel for the AIG entities in this matter. I am familiar with the matters referenced below.

2. Attached as Exhibit 1, is a true and accurate copy of excerpts from the trial transcript (July 8-18, 2013).

3. Attached as Exhibit 2, is a true and accurate copy of excerpts from the deposition transcript of Jason Kravitt (Sept. 19 & 20, 2012).

4. Attached as Exhibit 3, is a true and accurate copy of excerpts from the deposition transcript of Robert Bailey (Dec. 3, 2012).

5. Attached as Exhibit 4, is a true and accurate copy of excerpts from the deposition transcript of Loretta Lundberg (Oct. 2 & 3, 2012).

6. Attached as Exhibit 5, is a true and accurate copy of excerpts from the October 12, 2012 hearing transcript.

7. Attached as Exhibit 6, is a true and accurate copy of excerpts from the April 12, 2013 hearing transcript.

Dated this 30th day of August, 2013.


Michael A. Rollin