

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In the matter of the application of	: Civil Action No. 11-cv-5988-UA
	:
THE BANK OF NEW YORK MELLON (as	:
Trustee under various Pooling and Servicing	:
Agreements and Indenture Trustee under various	:
Indentures), et al.,	:
	:
Petitioners,	: NOTICE OF MOTION
	: TO INTERVENE
	:
- against -	:
	:
WALNUT PLACE LLC, et al.,	:
	:
Intervenor-Respondents.	:
	:
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PLEASE TAKE NOTICE that Ambac Assurance Corporation (“Ambac”) and The Segregated Account of Ambac Assurance Corporation (the “Segregated Account”) hereby move this Court for an Order permitting them to intervene as respondents in this proceeding, pursuant to Rule 24(a)(2), and in the alternative, Rule 24(b)(1)(B), of the Federal Rules of Civil Procedure, and for the reasons set forth in the accompanying Memorandum of Law in Support of Motion to Intervene.

Dated: New York, New York
August 30, 2011

Respectfully submitted,

AMBAC ASSURANCE CORPORATION
and THE SEGREGATED ACCOUNT OF
AMBAC ASSURANCE CORPORATION

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Respondents Ambac Assurance
Corporation and The Segregated
Account of Ambac Assurance
Corporation*