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To Bank Of New York Mellon, the group of Institutional Investors, and Bank of America Corporation, Bank of America Home Loans Servicing, LP, Countrywide Financial Corporation, and Countrywide Home Loans, Inc. (collectively, "BOA"):

- 1. All reports or similar documents prepared by experts or any other third party analyzing the Proposed Settlement (between BNY Mellon and BOA involving the 530 residential-securitization Trusts).
- 2. All documents provided to the experts or third parties identified in response to Request 1 for their consideration in preparing the reports.
- 3. All reports or documents provided to the Institutional Investors or BNY Mellon for their due diligence or exchanged between them and/or BOA discussing or analyzing the Proposed Settlement.
- 4. All documents exchanged between any of the Institutional Investors, BNY Mellon and/or BOA that discuss or analyze any other settlement proposals (besides the Proposed Settlement) for the 530 residential-securitization Trusts (collectively "Trusts").
- 5. All documents already produced to any government entities regarding the Proposed Settlement.
- 6. Any documents produced or transcripts of depositions taken in *MBIA Insurance Corp.* v. Countrywide Home Loans, Inc., et al., Index No. 08/602825 (N.Y. Sup. Ct.), regarding BOA's successor liability for any Countrywide entity, including all documents filed as an exhibit in that action by any party thereto under seal.
- 7. All demands made by the Institutional Investors that BNY Mellon, as Trustee, exercise any of the Trusts' rights against BOA.
- 8. For each Trust, documents sufficient to identify: the original principal balance and current remaining principal balance of the mortgage loans therein; the recognized losses incurred to date; the allocation of the remaining principal balances to the outstanding trust certificates; current or recent (within the last seven months) price, quote or value estimates for the securities issued in connection with or collateralized by the Trust; and the current amounts of loans (by remaining principal amount or as a percentage of remaining principal amount) delinquent, in bankruptcy, and/or in the process of foreclosure.
- 9. All analyses performed or received regarding the proportion of loans within each Trust that have or will have deficiencies, and are or will be subject to repurchase or rescission by the seller of those loans.

- 10. Documents sufficient to identify the Allocation Plan for the Proposed Settlement, and all documents provided to the Institutional Investors or BNY Mellon for their due diligence or exchanged between them and/or BOA discussing or analyzing the Allocation Plan, including any earlier drafts of the Allocation Plan, and earlier proposals for allocating the monetary recovery from the Proposed Settlement or from any other settlement proposals (besides the Proposed Settlement) for the Trusts.
- 11. All documents that discuss or analyze the indemnity provided to BNY Mellon in the Proposed Settlement, and all such documents provided to or exchanged between any of the Institutional Investors, BNY Mellon and/or BOA.