NYSCEF DOC. NO. 59

| SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK | |
|---|----------------------------|
| In the matter of the application of | - X : : |
| THE BANK OF NEW YORK MELLON, in its | : Index No. 150973/2016 |
| Capacity as Trustee or Indenture Trustee of 530 Countrywide Residential Mortgage-Backed Securitization Trusts | Assigned to: Scarpulla, J. |
| Petitioner, | RESPONSE OF CERTAIN |
| For Judicial Instructions under CPLR Article 77 | : INVESTORS : TO |
| On the Distribution of a Settlement Payment. | : OPENING : SUBMISSIONS |
| | : - X |

TO THE HONORABLE JUSTICE SCARPULLA:

The undersigned certificateholders (the "<u>Undersigned</u>"), who account for five of the eight certificateholder groups that filed papers on March 4, 2016, in response to the Court's February 5, 2016, Order to Show Cause (Dkt. No. 14),¹ submit the following joint reply pursuant to the Court's February 29, 2016, Scheduling Order (Dkt. No. 25). The Undersigned have reviewed the March 4 filings and agree that, despite some differences in the arguments set forth in those filings (many of which are highly technical), the Undersigned are fundamentally in agreement. It

¹ The eight certificateholder groups (the "<u>Interested Certificateholders</u>") and their corresponding filings are (i) a Joint Answer filed on behalf of three separate investors groups, specifically (a) AEGON, *et al.*, (b) American International Group, Inc., *et al.*, and (c) Triaxx Prime CDO 2006-1, Ltd., *et al.* (collectively, Dkt. No. 34-39); (ii) submissions by The Federal Home Loan Mortgage Corporation (Dkts. 40-42); (iii) submissions by Center Court, LLC (Dkts. 46-49); (iv) submissions by Blue Mountain Credit Alternatives Master Fund L.P., *et al.* (Dkt. Nos. 50-51); (v) a submission by TIG Securitized Asset Master Fund LP ("<u>TIG</u>") (Dkt. 30); and (vi) joint submissions by Prosiris Capital Management LP ("<u>Prosiris</u>") and Tilden Park Capital Management LP ("<u>Tilden</u>") (Dkts. 31-33). The Interested Certificateholders are the only parties that filed briefs in response to the Trustee's Verified Petition and this Court's Order to Show Cause, and therefore they constitute the universe of relevant "Interested Persons" for purposes of this Article 77 proceeding.

is now clear there is *no* triable issue of fact raised by the Undersigned or any of the other Interested Certificateholders with respect to 515 of the 530 RMBS trusts that are the subject of this Article 77 proceeding. With respect to those 515 Trusts (the "<u>Undisputed Trusts</u>"), the Trustee should distribute the Settlement Payment immediately using the "pay first, write up second" order of operations mandated by the Settlement Agreement and Final Judgment,² without giving effect to any alleged "illusory" overcollateralization in between making distributions and writing up the certificate balances that would permit the improper "leakage" of the Settlement Payment to those certificates that are not the most senior.

The only dispute that has been identified among the Interested Certificateholders is with respect to an issue that was not raised in the Trustee's Verified Petition and that concerns 15 Trusts identified in the joint submissions by Prosiris and Tilden (Dkt. Nos. 31, 32), and in the submission of TIG (Dkt. 30).³ With respect to those 15 Trusts (the "Disputed Trusts"), various parties may disagree as to the order of operations, whether distribution of the Settlement Payment to more junior holders is appropriate, and/or the proper treatment of the Settlement Payment in the relevant pooling and servicing agreements ("PSAs"). Accordingly, the Undersigned respectfully request that the Court set a schedule in which the Interested Certificateholders can first identify and then brief (and potentially narrow) any disagreements with respect to the distribution of the Settlement Payment to these 15 Disputed Trusts, *but* that the Trustee be instructed, with respect to the remaining 515 Undisputed Trusts, to distribute the Settlement Payment immediately as described below.

² In other words, by distributing the Allocable Share of the Settlement Payment prior to writing up the Certificate Principal Balance in any Trust. Settlement Agreement 3(d)(i), (ii).

³ Those 15 Trusts are the following: CWABS 2006-12, CWALT 2005-61, CWALT 2005-69, CWALT 2005-72, CWALT 2005-76, CWALT 2005-IMI, CWALT 2006-OA3, CWALT 2006-OA7, CWALT 2006-OAC8, CWALT 2006-OA10, CWALT 2006-OA14, CWALT 2007-OA3, CWALT 2007-OA8, CWMBS 2006-3, CWMBS 2006-OA5.

I. THERE IS NO TRIABLE ISSUE CONCERNING THE 355 NON-OC TRUSTS.

Among the 515 Undisputed Trusts, there are two subsets of trusts. The first set includes the 355 Trusts that do not contain an overcollateralization feature (the "<u>non-OC Trusts</u>") and are set forth in <u>Exhibit A</u> hereto. None of the March 4 submissions identifies any triable issue as to these 355 non-OC Trusts, and therefore nothing prevents the Court from entering a Final Judgment instructing the Trustee immediately to distribute the Settlement Payment as to those 355 non-OC Trusts. Following discussions among the Undersigned, no Interested Certificateholder challenges the "pay first, write-up second" order of operations required under the Settlement Agreement and this Court's Final Judgment, and no Interested Certificateholder has argued that doing so will produce "leakage" to more junior holders with respect to the non-OC Trusts.

Having now reviewed and considered the largely complementary approaches articulated in the parties' briefs, the Undersigned agree that the Court should: (1) sever the claims as to all Undisputed Trusts into a separate special proceeding pursuant to CPLR § 407⁴; and (2) issue a Final Judgment instructing the Trustee to distribute the Allocable Shares to the non-OC Trusts without further delay by following the "pay first, write-up second" approach in the Settlement Agreement.

⁴ "The court may at any time order a severance of a particular claim, counterclaim or cross-claim, or as to a particular party, and order that, as to such claim or party, the special proceeding continue as an action or as a separate special proceeding." CPLR § 407; *see also id.* at Practice Commentaries ("CPLR 407 gives the court in a special proceeding essentially the same severance powers possessed by the court in an action. *See* CPLR 603. *See also* CPLR 103(c). Such severances may be appropriate, in the court's discretion, to avoid delay, confusion or prejudice. This is especially important in a special proceeding, which is intended to be summary in nature.").

II. THERE IS NO TRIABLE ISSUE CONCERNING 160 OF THE 175 OC TRUSTS, AND THE SETTLEMENT PAYMENT SHOULD BE DISTRIBUTED IMMEDIATELY TO THESE TRUSTS.

The second set of Undisputed Trusts comprises 160 of the 175 Trusts that contain an overcollateralization feature (the "<u>Undisputed OC Trusts</u>") and are set forth in <u>Exhibit B</u> hereto. Accordingly, the Trustee should be instructed to pay immediately the Settlement Payment to the 160 Undisputed OC Trusts using the "pay first, write up second" order of operations required by Section 3(d) of the Settlement Agreement and this Court's Final Judgment, without giving effect to any alleged "temporary" or "illusory" overcollateralization that might arise between payment and writing up the certificate balances. This approach conforms to the PSAs and avoids "leakage" of funds to junior certificateholders.

Since there is no triable issue concerning how the Settlement Payment should be distributed in the Undisputed OC Trusts, the Trustee should be instructed to distribute the Settlement Payment to all Undisputed OC Trusts immediately, as described in the prior paragraph.

III. THE REMAINING OBJECTIONS, WHICH CONCERN ONLY 15 TRUSTS, POSE NO IMPEDIMENT TO ENTERING A FINAL JUDGMENT NOW AS TO THE UNDISPUTED TRUSTS.

The 15 Disputed Trusts employ an overcollateralization target structure. According to the parties' submissions, the issues in this proceeding with respect to these Trusts do *not* concern alleged "temporary or illusory" overcollateralization arising between payment and write-up, as set out in Paragraphs 25-26 of the Trustee's Petition. Instead, the disagreement among holders of the Disputed Trusts generally concerns the separate question of whether it is appropriate to permit portions of the Settlement Payment to flow to the more junior tranches to compensate certificateholders for unpaid realized losses instead of paying down the principal balances of more senior certificates, regardless of the level of overcollateralization in those Trusts.

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Since the Disputed Trusts' certificateholders concede the issues they raise are different from the issues raised in the Trustee's Petition, *see, e.g.*, Prosiris/Tilden Memo of Law, Dkt. 32, at 13 ("these 14 Trusts contain unique wording"), these certificateholders have not asserted any objection to an instruction to the Trustee to distribute the Settlement Payment immediately to the Undisputed Trusts. For the same reason, these issues raise no triable issue on the Undisputed Trusts.

With respect to the 15 Disputed Trusts, the Undersigned believe that the issues are complex and require further briefing. Accordingly, the Undersigned respectfully request that the Court set a briefing schedule that provides the Interested Certificateholders with the opportunity to identify and then brief any remaining disagreements they may have as to the proper interpretation of the Settlement Agreement and/or the Governing Agreements, as they apply to the Disputed Trusts. The Interested Certificateholders could also brief any remaining disputes as to the date that should be used in calculating how the Settlement Payment will be allocated to particular tranches within the Disputed Trusts, which is another issue that was not raised in the Verified Petition, but was raised in Prosiris/Tilden's response to the Petition. The Undersigned believe that any disagreement as to the 15 Disputed Trusts can be most efficiently resolved (and potentially limited further) in separate, targeted briefing addressing these issues.

The narrow issues as to the Disputed Trusts, however, should not be the cause of any further delay in distributing the Settlement Payment to the Undisputed Trusts. First, the Allocable Shares have already been allocated among the 530 Trusts, so an immediate distribution to the Undisputed Trusts will not alter the allocation or deplete the funds available to pay the Disputed Trusts their shares of the Settlement Payment. Second, since the issues pertaining to the Undisputed Trusts are distinct from the issues pertaining to the Disputed Trusts, entry of a

Final Judgment on the Undisputed Trusts will not preclude any party's arguments as to the Disputed Trusts.

CONCLUSION

Under CPLR § 409, the evidence submitted to the Court discloses no triable issue concerning whether the Trustee must follow the order of operations in Section 3(d) of the Settlement Agreement when it distributes the Settlement Payment to the Undisputed Trusts. There are also no other triable issues concerning how the Settlement Payment should be distributed in the 515 Undisputed Trusts.

Accordingly, the Undersigned respectfully request that the Court sever the proceedings as they relate to the Undisputed Trusts, pursuant to C.P.L.R. §407 and, at the hearing on March 15, 2016, enter a separate Final Judgment as described below:

1. Pursuant to CPLR § 407, the proceedings relating to the Undisputed Trusts, which are listed on Exhibits A and B, are severed into a separate special proceeding, for which a separate final judgment can and will be entered.

2. As to all Undisputed Trusts, the Trustee should distribute each Trust's Settlement Payment not later than the applicable April 2016 distribution date for each Trust, by following the "pay first, write-up second" order of operations in the Settlement Agreement and this Court's Final Judgment. For those Undisputed Trusts that employ an overcollateralization structure, the Trustee should distribute the Settlement Payment by determining overcollateralization so that the overcollateralization amount is calculated under the relevant Pooling and Servicing Agreement (or other Governing Agreement) before or after the distribution, as applicable, but not during the distribution in between payment and writing up the certificate balances, with no leakage to more junior certificates based upon this calculation.

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The Undersigned respectfully request that the above Final Judgment be entered as a separate judgment, so that it becomes final and permits the distribution to be made immediately to these Trusts.

Dated: New York, New York March 14, 2016

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Exhibit A: <u>355 Non-OC Undisputed Trusts</u>

| CWALT 2004-10CB CWALT 2005-17 CWALT 2005-54CB CWALT 2005-18 CWALT 2005-19 CWALT 2005-19 CWALT 2004-13CB CWALT 2005-19CB CWALT 2005-57CB CWALT 2006-11CB CWALT 2006-1171 CWALT 2004-14T2 CWALT 2005-20CB CWALT 2005-57CB CWALT 2006-1171 CWALT 2006-1171 CWALT 2004-14CB CWALT 2005-20CB CWALT 2005-50C CWALT 2006-1371 CWALT 2006-14CB CWALT 2004-17CB CWALT 2005-20CB CWALT 2005-61CB CWALT 2006-14CB CWALT 2006-14CB CWALT 2004-17CB CWALT 2005-21CB CWALT 2005-62C CWALT 2006-14CB CWALT 2006-13C CWALT 2004-17CB CWALT 2005-23CB CWALT 2005-64CB CWALT 2006-16CB CWALT 2006-17C CWALT 2004-24CB CWALT 2005-24CB CWALT 2005-64CB CWALT 2006-17C CWALT 2006-17C CWALT 2004-24CB CWALT 2005-27CB CWALT 2005-67CB CWALT 2006-20CB CWALT 2006-17C CWALT 2004-27CB CWALT 2005-27CB CWALT 2006-20CB CWALT 2006-20CB <th>r</th> <th></th> <th></th> <th>r</th> <th>1</th> | r | | | r | 1 |
|--|-----------------|-----------------|-----------------|-----------------|-----------------|
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| CWALT 2004-1472 CWALT 2005-1CB CWALT 2005-57CB CWALT 2006-12CB CWALT 2006-147B CWALT 2004-16CB CWALT 2005-20CB CWALT 2005-507CB CWALT 2006-1371 CWALT 2006-147B CWALT 2004-17CB CWALT 2005-20CB CWALT 2005-607C CWALT 2006-16CB CWALT 2006-16CB CWALT 2006-13CB CWALT 2004-17CB CWALT 2005-22T1 CWALT 2005-61C CWALT 2006-16CB CWALT 2006-13CB CWALT 2004-21T1 CWALT 2005-22CB CWALT 2005-63C CWALT 2006-16CB CWALT 2006-16CB CWALT 2004-24CB CWALT 2005-25CF CWALT 2006-16CB CWALT 2006-16CB CWALT 2006-17C CWALT 2004-24CB CWALT 2005-25CB CWALT 2005-67CB CWALT 2006-20CB CWALT 2006-17C CWALT 2004-24CB CWALT 2005-26CB CWALT 2005-27CB CWALT 2006-20CB CWALT 2006-20CB CWALT 2004-27CB CWALT 2005-27CB CWALT 2006-20CB CWALT 2006-20CB CWALT 2006-20CB CWALT 2004-28CB CWALT 2005-37CB CWALT 2006-20CB CWALT 2006-20CB CWALT 2006-20CB CWALT 2004-28CB CWALT 2005-37CB CWALT 2006-20CB CWALT 2006-20CB CWALT 2006-20CB | CWALT 2004-12CB | CWALT 2005-18CB | CWALT 2005-55CB | CWALT 2005-J9 | CWALT 2006-HY10 |
| CWALT 2004-165 CWALT 2005-22 CWALT 2005-58 CWALT 2006-13T1 CWALT 2006-14CB CWALT 2004-16CB CWALT 2005-20CB CWALT 2005-59 CWALT 2006-14CB CWALT 2006-11 CWALT 2004-17CB CWALT 2005-21CB CWALT 2005-60 CWALT 2006-14CB CWALT 2006-22 CWALT 2004-20T1 CWALT 2005-23CB CWALT 2005-62 CWALT 2006-16CB CWALT 2006-316 CWALT 2004-22CB CWALT 2005-23CI CWALT 2005-64CB CWALT 2006-16CB CWALT 2006-316 CWALT 2004-24CB CWALT 2005-25CI CWALT 2005-66C CWALT 2006-316 CWALT 2006-316 CWALT 2004-27CB CWALT 2005-26CB CWALT 2005-66C CWALT 2006-316 CWALT 2006-316 CWALT 2004-27CB CWALT 2005-28CB CWALT 2005-60CB CWALT 2006-21CB CWALT 2006-316 CWALT 2004-27CB CWALT 2005-32CB CWALT 2005-30CB CWALT 2006-21CB CWALT 2006-317 CWALT 2004-28CB CWALT 2005-30CB CWALT 2005-30CB CWALT 2006-316 CWALT 2006-316 CWALT 2004-28CB CWALT 2005-30CB CWALT 2005-77CB CWALT 2006-30CB CWALT 2006-30CB CWALT 2004-312 | CWALT 2004-13CB | | CWALT 2005-56 | CWALT 2006-11CB | |
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| CWALT 2004-17CB CWALT 2005-21CB CWALT 2005-62T CWALT 2006-15CB CWALT 2006-12 CWALT 2004-18CB CWALT 2005-22T1 CWALT 2005-62 CWALT 2006-16CB CWALT 2006-13 CWALT 2004-20T1 CWALT 2005-23CB CWALT 2005-642 CWALT 2006-16CB CWALT 2006-14 CWALT 2004-24CB CWALT 2005-25T1 CWALT 2005-66CB CWALT 2006-19CB CWALT 2006-17 CWALT 2004-25CB CWALT 2005-26CB CWALT 2005-66C CWALT 2006-20CB CWALT 2006-31 CWALT 2004-25CB CWALT 2005-27 CWALT 2005-67CB CWALT 2006-21CB CWALT 2006-31 CWALT 2004-28CB CWALT 2005-28CB CWALT 2005-7CB CWALT 2006-24CB CWALT 2006-0A1 CWALT 2004-28CB CWALT 2005-31 CWALT 2005-77 CWALT 2006-26CB CWALT 2006-0A1 CWALT 2004-32CB CWALT 2005-31 CWALT 2005-77 CWALT 2006-27CB CWALT 2006-0A1 CWALT 2004-32CB CWALT 2005-32CB CWALT 2005-77 CWALT 2006-27CB CWALT 2006-0A2 CWALT 2004-32CB CWALT 2005-32CB CWALT 2005-77 CWALT 2006-27CB CWALT 2006-0A1 CWALT 2004-31C CWAL | CWALT 2004-15 | CWALT 2005-2 | CWALT 2005-58 | CWALT 2006-13T1 | CWALT 2006-HY3 |
| CWALT 2004-18CBCWALT 2005-22T1CWALT 2005-63CCWALT 2006-16CBCWALT 2006-13CWALT 2004-20T1CWALT 2005-23CBCWALT 2005-63CBCWALT 2006-17T1CWALT 2006-13CWALT 2004-22CBCWALT 2005-23CBCWALT 2005-64CBCWALT 2006-18CBCWALT 2006-17CWALT 2004-24CBCWALT 2005-25CBCWALT 2005-66CBCWALT 2006-20CBCWALT 2006-17CWALT 2004-25CBCWALT 2005-26CBCWALT 2005-67CBCWALT 2006-21CBCWALT 2006-07CWALT 2004-25CBCWALT 2005-29CBCWALT 2005-70CBCWALT 2006-24CBCWALT 2006-0A1CWALT 2004-27CBCWALT 2005-39CBCWALT 2005-70CBCWALT 2006-24CBCWALT 2006-0A1CWALT 2004-27CBCWALT 2005-39CBCWALT 2005-70CBCWALT 2006-26CBCWALT 2006-0A1CWALT 2004-27CBCWALT 2005-31CCWALT 2005-77CBCWALT 2006-20CBCWALT 2006-0A1CWALT 2004-32CBCWALT 2005-31CCWALT 2005-77CBCWALT 2006-20CBCWALT 2006-0A2CWALT 2004-32CBCWALT 2005-33CBCWALT 2005-77CBCWALT 2006-20CBCWALT 2006-0A2CWALT 2004-33CBCWALT 2005-33CBCWALT 2005-77CBCWALT 2006-30CBCWALT 2007-10CBCWALT 2004-34T1CWALT 2005-33CBCWALT 2005-77CBCWALT 2006-31CBCWALT 2007-10CBCWALT 2004-34T2CWALT 2005-34CBCWALT 2005-77CBCWALT 2006-31CBCWALT 2007-11T1CWALT 2004-34T1CWALT 2005-34CBCWALT 2005-31CBCWALT 2007-11T1CWALT 2004-34CBCWALT 2005-34CBCWALT 2007-11CBCWALT 2007-11T1CWALT 2004-31TCWALT 2005 | CWALT 2004-16CB | CWALT 2005-20CB | CWALT 2005-59 | CWALT 2006-14CB | CWALT 2006-J1 |
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| CWALT 2004-22CBCWALT 2005-24CICWALT 2005-64CBCWALT 2006-18CBCWALT 2006-19CWALT 2004-24CBCWALT 2005-25CBCWALT 2005-65CBCWALT 2006-19CBCWALT 2006-19CWALT 2004-25CBCWALT 2005-26CBCWALT 2005-66CBCWALT 2006-20CBCWALT 2006-17CWALT 2004-26CBCWALT 2005-27CCWALT 2005-67CBCWALT 2006-20CBCWALT 2006-00-01CWALT 2004-27CBCWALT 2005-29CBCWALT 2005-67CBCWALT 2006-24CBCWALT 2006-0A12CWALT 2004-28CBCWALT 2005-30CBCWALT 2005-77CBCWALT 2006-24CBCWALT 2006-0A11CWALT 2004-29CBCWALT 2005-30CBCWALT 2005-77CBCWALT 2006-24CBCWALT 2006-0A11CWALT 2004-30CBCWALT 2005-31CBCWALT 2005-77CBCWALT 2006-27CBCWALT 2006-0A21CWALT 2004-30CBCWALT 2005-33CBCWALT 2005-77CBCWALT 2006-27CBCWALT 2006-0A21CWALT 2004-30CBCWALT 2005-33CBCWALT 2005-77CBCWALT 2006-27CBCWALT 2006-0A21CWALT 2004-33CBCWALT 2005-37CBCWALT 2006-27CBCWALT 2006-0A21CWALT 2004-33C1CWALT 2005-37CBCWALT 2006-27CBCWALT 2006-0A21CWALT 2004-33C2CWALT 2005-37CBCWALT 2006-27CBCWALT 2007-10CBCWALT 2004-35C3CWALT 2005-37CBCWALT 2006-27CBCWALT 2007-10CBCWALT 2004-35C3CWALT 2005-37CBCWALT 2006-37CBCWALT 2007-10CBCWALT 2004-37C3CWALT 2005-37CBCWALT 2006-37CBCWALT 2007-10CBCWALT 2004-47C3CWALT 2005-37CBCWALT 2006-37CBCWALT 2007-10CBCWALT 2004- | CWALT 2004-18CB | CWALT 2005-22T1 | CWALT 2005-62 | CWALT 2006-16CB | CWALT 2006-J3 |
| CWALT 2004-24CB CWALT 2005-25TI CWALT 2005-65CB CWALT 2006-19CB CWALT 2006-19CB CWALT 2004-25CB CWALT 2005-26CB CWALT 2005-66C CWALT 2006-20CB CWALT 2006-31 CWALT 2004-26TI CWALT 2005-28CB CWALT 2005-67CB CWALT 2006-21CB CWALT 2006-0A1 CWALT 2004-27CB CWALT 2005-32CB CWALT 2005-67CB CWALT 2006-23CB CWALT 2006-0A1 CWALT 2004-28CB CWALT 2005-30CB CWALT 2005-77CB CWALT 2006-26CB CWALT 2006-0A1 CWALT 2004-30CB CWALT 2005-311 CWALT 2005-77CB CWALT 2006-26CB CWALT 2006-0A1 CWALT 2004-30CB CWALT 2005-311 CWALT 2005-77CB CWALT 2006-27CB CWALT 2006-0A2 CWALT 2004-32CB CWALT 2005-33CB CWALT 2005-77CB CWALT 2006-28CB CWALT 2006-0A2 CWALT 2004-33C CWALT 2005-37CB CWALT 2006-28CB CWALT 2006-0A1 CWALT 2004-33C CWALT 2005-37CB CWALT 2006-28CB CWALT 2006-0A2 CWALT 2004-33TI CWALT 2005-77CB CWALT 2006-28CB CWALT 2007-10CB CWALT 2004-34CB CWALT 2005-36C CWALT 2006-36CB CWALT 2007-10CB | CWALT 2004-20T1 | CWALT 2005-23CB | CWALT 2005-63 | CWALT 2006-17T1 | CWALT 2006-J4 |
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| CWALT 2004-3T1 CWALT 2005-38 CWALT 2005-81 CWALT 2006-32CB CWALT 2007-13 CWALT 2004-4CB CWALT 2005-3CB CWALT 2005-82 CWALT 2006-33CB CWALT 2007-14T2 CWALT 2004-5CB CWALT 2005-44 CWALT 2005-83CB CWALT 2006-344 CWALT 2007-15CB CWALT 2004-7T1 CWALT 2005-40CB CWALT 2005-844 CWALT 2006-35CB CWALT 2007-16CB CWALT 2004-9T1 CWALT 2005-41 CWALT 2005-85CB CWALT 2006-36T2 CWALT 2007-17CB CWALT 2004-9T1 CWALT 2005-42CB CWALT 2005-86CB CWALT 2006-39CB CWALT 2007-17CB CWALT 2004-J10 CWALT 2005-42CB CWALT 2005-9CB CWALT 2006-40T1 CWALT 2007-18CB CWALT 2004-J11 CWALT 2005-43 CWALT 2005-9CB CWALT 2006-41CB CWALT 2007-18CB CWALT 2004-J12 CWALT 2005-45 CWALT 2005-J10 CWALT 2006-41CB CWALT 2007-20C CWALT 2004-J3 CWALT 2005-46CB CWALT 2005-J10 CWALT 2006-41CB CWALT 2007-20C CWALT 2004-J3 CWALT 2005-47CB CWALT 2005-J11 CWALT 2006-41CB CWALT 2007-20C CWALT 2004-J3 CWALT 20 | CWALT 2004-35T2 | CWALT 2005-36 | CWALT 2005-7CB | CWALT 2006-30T1 | CWALT 2007-11T1 |
| CWALT 2004-4CBCWALT 2005-3CBCWALT 2005-82CWALT 2006-33CBCWALT 2007-1472CWALT 2004-5CBCWALT 2005-40CWALT 2005-83CBCWALT 2006-34CWALT 2007-15CBCWALT 2004-7T1CWALT 2005-40CBCWALT 2005-84CWALT 2006-35CBCWALT 2007-16CBCWALT 2004-9T1CWALT 2005-41CWALT 2005-85CBCWALT 2006-36T2CWALT 2007-17CBCWALT 2004-9T1CWALT 2005-42CBCWALT 2005-86CBCWALT 2006-37CBCWALT 2007-18CBCWALT 2004-111CWALT 2005-42CBCWALT 2005-9CBCWALT 2006-40T1CWALT 2007-19CCWALT 2004-112CWALT 2005-44CWALT 2005-11CWALT 2006-41CBCWALT 2007-19CCWALT 2004-12CWALT 2005-44CWALT 2005-11CWALT 2006-41CBCWALT 2007-20CWALT 2004-12CWALT 2005-44CBCWALT 2005-110CWALT 2006-41CBCWALT 2007-20CWALT 2004-13CWALT 2005-46CBCWALT 2005-110CWALT 2006-41CBCWALT 2007-20CWALT 2004-13CWALT 2005-46CBCWALT 2005-111CWALT 2006-41CBCWALT 2007-20CWALT 2004-13CWALT 2005-46CBCWALT 2005-111CWALT 2006-41CBCWALT 2007-21CBCWALT 2004-14CWALT 2005-46CBCWALT 2007-21CBCWALT 2007-21CBCWALT 2007-22CWALT 2004-15CWALT 2005-47CBCWALT 2005-114CWALT 2006-46CBCWALT 2007-23CBCWALT 2005-10CBCWALT 2005-50CBCWALT 2005-13CWALT 2006-67CBCWALT 2007-20CBCWALT 2005-14CWALT 2005-53CBCWALT 2005-17CWALT 2006-7CBCWALT 2007-4CBCWALT 2005-16CWALT 2005 | CWALT 2004-36CB | CWALT 2005-37T1 | CWALT 2005-80CB | CWALT 2006-31CB | CWALT 2007-12T1 |
| CWALT 2004-5CBCWALT 2005-44CWALT 2005-83CBCWALT 2006-34CWALT 2007-15CBCWALT 2004-7T1CWALT 2005-40CBCWALT 2005-84CWALT 2006-35CBCWALT 2007-16CBCWALT 2004-9T1CWALT 2005-41CWALT 2005-85CBCWALT 2006-36T2CWALT 2007-17CBCWALT 2004-9T1CWALT 2005-42CBCWALT 2005-86CBCWALT 2006-39CBCWALT 2007-18CBCWALT 2004-110CWALT 2005-43CCWALT 2005-9CBCWALT 2006-40T1CWALT 2007-19CCWALT 2004-111CWALT 2005-44CWALT 2005-9CBCWALT 2006-41CBCWALT 2007-19CCWALT 2004-122CWALT 2005-44CWALT 2005-110CWALT 2006-41CBCWALT 2007-10CCWALT 2004-132CWALT 2005-45CBCWALT 2005-110CWALT 2006-41CBCWALT 2007-20CCWALT 2004-14CWALT 2005-46CBCWALT 2005-110CWALT 2006-41CBCWALT 2007-21CBCWALT 2004-15CWALT 2005-46CBCWALT 2005-110CWALT 2006-41CBCWALT 2007-21CBCWALT 2004-15CWALT 2005-46CBCWALT 2005-113CWALT 2006-45CICWALT 2007-22CBCWALT 2004-148CWALT 2005-47CBCWALT 2005-114CWALT 2006-45CBCWALT 2007-23CBCWALT 2005-10CBCWALT 2005-49CBCWALT 2005-132CWALT 2006-45CBCWALT 2007-23CBCWALT 2005-11CBCWALT 2005-50CBCWALT 2005-132CWALT 2006-45CBCWALT 2007-25CBCWALT 2005-13CBCWALT 2005-51CCWALT 2005-51CCWALT 2005-16CCWALT 2007-25CBCWALT 2005-13CBCWALT 2005-51CCWALT 2005-16CWALT 2006-6CBCWALT 2007-31CCWALT 2005-164 </td <td>CWALT 2004-3T1</td> <td>CWALT 2005-38</td> <td>CWALT 2005-81</td> <td>CWALT 2006-32CB</td> <td>CWALT 2007-13</td> | CWALT 2004-3T1 | CWALT 2005-38 | CWALT 2005-81 | CWALT 2006-32CB | CWALT 2007-13 |
| CWALT 2004-7T1CWALT 2005-40CBCWALT 2005-84CWALT 2006-35CBCWALT 2007-16CBCWALT 2004-9T1CWALT 2005-41CWALT 2005-85CBCWALT 2006-36T2CWALT 2007-17CBCWALT 2004-110CWALT 2005-42CBCWALT 2005-86CBCWALT 2006-39CBCWALT 2007-18CBCWALT 2004-111CWALT 2005-43CWALT 2005-9CBCWALT 2006-40T1CWALT 2007-19CCWALT 2004-112CWALT 2005-44CWALT 2005-10CWALT 2006-41CBCWALT 2007-11CWALT 2004-12CWALT 2005-45CWALT 2005-110CWALT 2006-41CBCWALT 2007-20CWALT 2004-13CWALT 2005-46CBCWALT 2005-110CWALT 2006-41CBCWALT 2007-21CBCWALT 2004-14CWALT 2005-46CBCWALT 2005-111CWALT 2006-41CBCWALT 2007-21CBCWALT 2004-15CWALT 2005-46CBCWALT 2005-111CWALT 2006-41CBCWALT 2007-21CBCWALT 2004-15CWALT 2005-47CBCWALT 2005-113CWALT 2006-45T1CWALT 2007-22CCWALT 2004-15CWALT 2005-47CBCWALT 2005-114CWALT 2006-45T1CWALT 2007-23CBCWALT 2004-16CWALT 2005-49CBCWALT 2005-114CWALT 2006-45T1CWALT 2007-24CCWALT 2005-10CBCWALT 2005-49CBCWALT 2005-132CWALT 2006-45T1CWALT 2007-25CCWALT 2005-11CBCWALT 2005-50CBCWALT 2005-135CWALT 2006-6CBCWALT 2007-2CBCWALT 2005-16CWALT 2005-53CECWALT 2005-16CWALT 2006-6CBCWALT 2007-3C1CWALT 2005-16CWALT 2005-53CECWALT 2005-16CWALT 2006-6CBCWALT 2007-3C1CWALT 2005-16CWALT 2 | CWALT 2004-4CB | CWALT 2005-3CB | CWALT 2005-82 | CWALT 2006-33CB | CWALT 2007-14T2 |
| CWALT 2004-9T1CWALT 2005-41CWALT 2005-85CBCWALT 2006-36T2CWALT 2007-17CBCWALT 2004-J10CWALT 2005-42CBCWALT 2005-86CBCWALT 2006-39CBCWALT 2007-18CBCWALT 2004-J11CWALT 2005-43CWALT 2005-9CBCWALT 2006-40T1CWALT 2007-19CWALT 2004-J12CWALT 2005-44CWALT 2005-J10CWALT 2006-41CBCWALT 2007-111CWALT 2004-J2CWALT 2005-45CWALT 2005-J10CWALT 2006-42CWALT 2007-20CWALT 2004-J3CWALT 2005-46CBCWALT 2005-J10CWALT 2006-43CBCWALT 2007-21CBCWALT 2004-J4CWALT 2005-47CBCWALT 2005-J13CWALT 2006-45T1CWALT 2007-22CWALT 2004-J5CWALT 2005-48T1CWALT 2005-J14CWALT 2006-45T1CWALT 2007-23CBCWALT 2004-J8CWALT 2005-48T1CWALT 2005-J14CWALT 2006-4CBCWALT 2007-24CWALT 2005-10CBCWALT 2005-49CBCWALT 2005-J3CWALT 2006-5T2CWALT 2007-25CWALT 2005-11CBCWALT 2005-50CBCWALT 2005-J3CWALT 2006-5T2CWALT 2007-26CWALT 2005-13CBCWALT 2005-51CWALT 2005-J5CWALT 2006-7CBCWALT 2007-27CWALT 2005-14CWALT 2005-52CBCWALT 2005-J6CWALT 2006-7CBCWALT 2007-3T1CWALT 2005-16CWALT 2005-53T2CWALT 2005-J7CWALT 2006-8T1CWALT 2007-4CB | CWALT 2004-5CB | CWALT 2005-4 | CWALT 2005-83CB | CWALT 2006-34 | CWALT 2007-15CB |
| CWALT 2004-J10CWALT 2005-42CBCWALT 2005-86CBCWALT 2006-39CBCWALT 2007-18CBCWALT 2004-J11CWALT 2005-43CWALT 2005-9CBCWALT 2006-40T1CWALT 2007-19CWALT 2004-J12CWALT 2005-44CWALT 2005-J1CWALT 2006-41CBCWALT 2007-11TCWALT 2004-J2CWALT 2005-45CWALT 2005-J10CWALT 2006-43CBCWALT 2007-20CWALT 2004-J3CWALT 2005-46CBCWALT 2005-J11CWALT 2006-43CBCWALT 2007-21CBCWALT 2004-J4CWALT 2005-46CBCWALT 2005-J13CWALT 2006-43CBCWALT 2007-21CBCWALT 2004-J5CWALT 2005-47CBCWALT 2005-J13CWALT 2006-43CBCWALT 2007-22CWALT 2004-J6CWALT 2005-48T1CWALT 2005-J14CWALT 2006-45T1CWALT 2007-23CBCWALT 2005-10CBCWALT 2005-48T1CWALT 2005-J14CWALT 2006-45CBCWALT 2007-24CWALT 2005-10CBCWALT 2005-49CBCWALT 2005-J2CWALT 2006-4CBCWALT 2007-24CWALT 2005-10CBCWALT 2005-50CBCWALT 2005-J3CWALT 2006-572CWALT 2007-25CWALT 2005-13CBCWALT 2005-55CBCWALT 2005-J5CWALT 2006-6CBCWALT 2007-3T1CWALT 2005-14CWALT 2005-53CBCWALT 2005-J7CWALT 2006-7CBCWALT 2007-3T1CWALT 2005-16CWALT 2005-53CBCWALT 2005-J7CWALT 2006-8T1CWALT 2007-4CBCWALT 2005-16CWALT 2005-53CBCWALT 2005-J7CWALT 2006-8T1CWALT 2007-4CBCWALT 2005-16CWALT 2005-53CBCWALT 2005-J7CWALT 2006-8T1CWALT 2007-4CBCWALT 2005-16CWALT 2005-53CB <td>CWALT 2004-7T1</td> <td>CWALT 2005-40CB</td> <td>CWALT 2005-84</td> <td>CWALT 2006-35CB</td> <td>CWALT 2007-16CB</td> | CWALT 2004-7T1 | CWALT 2005-40CB | CWALT 2005-84 | CWALT 2006-35CB | CWALT 2007-16CB |
| CWALT 2004-J11 CWALT 2005-43 CWALT 2005-9CB CWALT 2006-40T1 CWALT 2007-19 CWALT 2004-J12 CWALT 2005-44 CWALT 2005-J1 CWALT 2006-41CB CWALT 2007-171 CWALT 2004-J2 CWALT 2005-45 CWALT 2005-J10 CWALT 2006-422 CWALT 2007-20 CWALT 2004-J3 CWALT 2005-46CB CWALT 2005-J10 CWALT 2006-43CB CWALT 2007-21CB CWALT 2004-J6 CWALT 2005-47CB CWALT 2005-J13 CWALT 2006-45T1 CWALT 2007-22C CWALT 2004-J8 CWALT 2005-48T1 CWALT 2005-J14 CWALT 2006-45T1 CWALT 2007-23CB CWALT 2005-10CB CWALT 2005-49CB CWALT 2005-J14 CWALT 2006-46E CWALT 2007-24 CWALT 2005-10CB CWALT 2005-49CB CWALT 2005-J2 CWALT 2006-46E CWALT 2007-24 CWALT 2005-10CB CWALT 2005-50CB CWALT 2005-J3 CWALT 2006-572 CWALT 2007-25 CWALT 2005-13CB CWALT 2005-51 CWALT 2005-J3 CWALT 2006-572 CWALT 2007-2CB CWALT 2005-14 CWALT 2005-53CB CWALT 2005-J6 CWALT 2006-7CB CWALT 2007-3T1 CWALT 2005-14 CWALT 2005-53T2 | CWALT 2004-9T1 | CWALT 2005-41 | CWALT 2005-85CB | CWALT 2006-36T2 | CWALT 2007-17CB |
| CWALT 2004-J12 CWALT 2005-44 CWALT 2005-J1 CWALT 2006-41CB CWALT 2007-1T1 CWALT 2004-J2 CWALT 2005-45 CWALT 2005-J10 CWALT 2006-42 CWALT 2007-20 CWALT 2004-J3 CWALT 2005-46CB CWALT 2005-J11 CWALT 2006-43CB CWALT 2007-21CB CWALT 2004-J6 CWALT 2005-47CB CWALT 2005-J13 CWALT 2006-43CB CWALT 2007-22 CWALT 2004-J6 CWALT 2005-47CB CWALT 2005-J13 CWALT 2006-45T1 CWALT 2007-22 CWALT 2004-J8 CWALT 2005-48T1 CWALT 2005-J14 CWALT 2006-45T1 CWALT 2007-23CB CWALT 2005-10CB CWALT 2005-49CB CWALT 2005-J2 CWALT 2006-45CB CWALT 2007-24 CWALT 2005-11CB CWALT 2005-50CB CWALT 2005-J3 CWALT 2006-5T2 CWALT 2007-25 CWALT 2005-13CB CWALT 2005-50CB CWALT 2005-J3 CWALT 2006-5T2 CWALT 2007-2CB CWALT 2005-13CB CWALT 2005-51 CWALT 2005-J5 CWALT 2006-6CB CWALT 2007-2CB CWALT 2005-14 CWALT 2005-52CB CWALT 2005-J6 CWALT 2006-7CB CWALT 2007-3T1 CWALT 2005-16 CWALT 2005-53T2 | CWALT 2004-J10 | CWALT 2005-42CB | CWALT 2005-86CB | CWALT 2006-39CB | CWALT 2007-18CB |
| CWALT 2004-J2 CWALT 2005-45 CWALT 2005-J10 CWALT 2006-42 CWALT 2007-20 CWALT 2004-J3 CWALT 2005-46CB CWALT 2005-J11 CWALT 2006-43CB CWALT 2007-21CB CWALT 2004-J6 CWALT 2005-47CB CWALT 2005-J13 CWALT 2006-45T1 CWALT 2007-22 CWALT 2004-J8 CWALT 2005-48T1 CWALT 2005-J14 CWALT 2006-45T1 CWALT 2007-23CB CWALT 2005-10CB CWALT 2005-49CB CWALT 2005-J14 CWALT 2006-46CB CWALT 2007-24 CWALT 2005-10CB CWALT 2005-50CB CWALT 2005-J2 CWALT 2006-4CB CWALT 2007-24 CWALT 2005-11CB CWALT 2005-50CB CWALT 2005-J3 CWALT 2006-6CB CWALT 2007-25 CWALT 2005-13CB CWALT 2005-51 CWALT 2005-J5 CWALT 2006-6CB CWALT 2007-2CB CWALT 2005-14 CWALT 2005-52CB CWALT 2005-J6 CWALT 2006-7CB CWALT 2007-3T1 CWALT 2005-16 CWALT 2005-53T2 CWALT 2005-J7 CWALT 2006-8T1 CWALT 2007-4CB | CWALT 2004-J11 | CWALT 2005-43 | CWALT 2005-9CB | CWALT 2006-40T1 | CWALT 2007-19 |
| CWALT 2004-J3 CWALT 2005-46CB CWALT 2005-J11 CWALT 2006-43CB CWALT 2007-21CB CWALT 2004-J6 CWALT 2005-47CB CWALT 2005-J13 CWALT 2006-45T1 CWALT 2007-22 CWALT 2004-J8 CWALT 2005-48T1 CWALT 2005-J14 CWALT 2006-45T1 CWALT 2007-23CB CWALT 2005-10CB CWALT 2005-49CB CWALT 2005-J2 CWALT 2006-46CB CWALT 2007-24 CWALT 2005-11CB CWALT 2005-50CB CWALT 2005-J3 CWALT 2006-4CB CWALT 2007-25 CWALT 2005-13CB CWALT 2005-50CB CWALT 2005-J3 CWALT 2006-572 CWALT 2007-25 CWALT 2005-13CB CWALT 2005-50CB CWALT 2005-J3 CWALT 2006-6CB CWALT 2007-2CB CWALT 2005-13CB CWALT 2005-51 CWALT 2005-J6 CWALT 2006-7CB CWALT 2007-2CB CWALT 2005-14 CWALT 2005-53T2 CWALT 2005-J7 CWALT 2006-8T1 CWALT 2007-4CB CWALT 2005-16 CWALT 2005-53T2 CWALT 2005-J7 CWALT 2006-8T1 CWALT 2007-4CB | CWALT 2004-J12 | CWALT 2005-44 | CWALT 2005-J1 | CWALT 2006-41CB | CWALT 2007-1T1 |
| CWALT 2004-J6 CWALT 2005-47CB CWALT 2005-J13 CWALT 2006-45T1 CWALT 2007-22 CWALT 2004-J8 CWALT 2005-48T1 CWALT 2005-J14 CWALT 2006-46 CWALT 2007-23CB CWALT 2005-10CB CWALT 2005-49CB CWALT 2005-J2 CWALT 2006-4CB CWALT 2007-24 CWALT 2005-11CB CWALT 2005-50CB CWALT 2005-J3 CWALT 2006-5T2 CWALT 2007-25 CWALT 2005-13CB CWALT 2005-51 CWALT 2005-J5 CWALT 2006-6CB CWALT 2007-2CB CWALT 2005-14 CWALT 2005-52CB CWALT 2005-J6 CWALT 2006-7CB CWALT 2007-3T1 CWALT 2005-16 CWALT 2005-53T2 CWALT 2005-J7 CWALT 2006-8T1 CWALT 2007-4CB | CWALT 2004-J2 | CWALT 2005-45 | CWALT 2005-J10 | CWALT 2006-42 | CWALT 2007-20 |
| CWALT 2004-J8 CWALT 2005-48T1 CWALT 2005-J14 CWALT 2006-46 CWALT 2007-23CB CWALT 2005-10CB CWALT 2005-49CB CWALT 2005-J2 CWALT 2006-4CB CWALT 2007-24 CWALT 2005-11CB CWALT 2005-50CB CWALT 2005-J3 CWALT 2006-4CB CWALT 2007-25 CWALT 2005-13CB CWALT 2005-50CB CWALT 2005-J3 CWALT 2006-6CB CWALT 2007-2CB CWALT 2005-13CB CWALT 2005-51 CWALT 2005-J5 CWALT 2006-6CB CWALT 2007-2CB CWALT 2005-14 CWALT 2005-52CB CWALT 2005-J6 CWALT 2006-7CB CWALT 2007-3T1 CWALT 2005-16 CWALT 2005-53T2 CWALT 2005-J7 CWALT 2006-8T1 CWALT 2007-4CB | CWALT 2004-J3 | CWALT 2005-46CB | CWALT 2005-J11 | CWALT 2006-43CB | CWALT 2007-21CB |
| CWALT 2005-10CB CWALT 2005-49CB CWALT 2005-J2 CWALT 2006-4CB CWALT 2007-24 CWALT 2005-11CB CWALT 2005-50CB CWALT 2005-J3 CWALT 2006-5T2 CWALT 2007-25 CWALT 2005-13CB CWALT 2005-51 CWALT 2005-J5 CWALT 2006-6CB CWALT 2007-2CB CWALT 2005-14 CWALT 2005-52CB CWALT 2005-J6 CWALT 2006-7CB CWALT 2007-3T1 CWALT 2005-16 CWALT 2005-53T2 CWALT 2005-J7 CWALT 2006-8T1 CWALT 2007-4CB | CWALT 2004-J6 | CWALT 2005-47CB | CWALT 2005-J13 | CWALT 2006-45T1 | CWALT 2007-22 |
| CWALT 2005-11CB CWALT 2005-50CB CWALT 2005-J3 CWALT 2006-5T2 CWALT 2007-25 CWALT 2005-13CB CWALT 2005-51 CWALT 2005-J5 CWALT 2006-6CB CWALT 2007-2CB CWALT 2005-14 CWALT 2005-52CB CWALT 2005-J6 CWALT 2006-7CB CWALT 2007-3T1 CWALT 2005-16 CWALT 2005-53T2 CWALT 2005-J7 CWALT 2006-8T1 CWALT 2007-4CB | CWALT 2004-J8 | CWALT 2005-48T1 | CWALT 2005-J14 | CWALT 2006-46 | CWALT 2007-23CB |
| CWALT 2005-13CB CWALT 2005-51 CWALT 2005-J5 CWALT 2006-6CB CWALT 2007-2CB CWALT 2005-14 CWALT 2005-52CB CWALT 2005-J6 CWALT 2006-7CB CWALT 2007-3T1 CWALT 2005-16 CWALT 2005-53T2 CWALT 2005-J7 CWALT 2006-8T1 CWALT 2007-4CB | CWALT 2005-10CB | CWALT 2005-49CB | CWALT 2005-J2 | CWALT 2006-4CB | CWALT 2007-24 |
| CWALT 2005-14 CWALT 2005-52CB CWALT 2005-J6 CWALT 2006-7CB CWALT 2007-3T1 CWALT 2005-16 CWALT 2005-53T2 CWALT 2005-J7 CWALT 2006-8T1 CWALT 2007-4CB | CWALT 2005-11CB | CWALT 2005-50CB | CWALT 2005-J3 | CWALT 2006-5T2 | CWALT 2007-25 |
| CWALT 2005-16 CWALT 2005-53T2 CWALT 2005-J7 CWALT 2006-8T1 CWALT 2007-4CB | CWALT 2005-13CB | CWALT 2005-51 | CWALT 2005-J5 | CWALT 2006-6CB | CWALT 2007-2CB |
| | CWALT 2005-14 | CWALT 2005-52CB | CWALT 2005-J6 | CWALT 2006-7CB | CWALT 2007-3T1 |
| CWALT 2007-5CB CWHL 2004-HYB5 CWHL 2005-9 CWHL 2006-TM1 | CWALT 2005-16 | CWALT 2005-53T2 | CWALT 2005-J7 | CWALT 2006-8T1 | CWALT 2007-4CB |
| | CWALT 2007-5CB | CWHL 2004-HYB5 | CWHL 2005-9 | CWHL 2006-TM1 | |

Exhibit A: 355 Non-OC Undisputed Trusts

| CWALT 2007-6 | CWHL 2004-HYB6 | CWHL 2005-HY10 | CWHL 2007-1 |
|-----------------|----------------|----------------|----------------|
| CWALT 2007-7T2 | CWHL 2004-HYB7 | CWHL 2005-HYB1 | CWHL 2007-10 |
| CWALT 2007-8CB | CWHL 2004-HYB8 | CWHL 2005-HYB2 | CWHL 2007-11 |
| CWALT 2007-9T1 | CWHL 2004-HYB9 | CWHL 2005-HYB3 | CWHL 2007-12 |
| CWALT 2007-AL1 | CWHL 2004-J2 | CWHL 2005-HYB4 | CWHL 2007-13 |
| CWALT 2007-HY2 | CWHL 2004-J3 | CWHL 2005-HYB5 | CWHL 2007-14 |
| CWALT 2007-HY4 | CWHL 2004-J4 | CWHL 2005-HYB6 | CWHL 2007-15 |
| CWALT 2007-J2 | CWHL 2004-J5 | CWHL 2005-HYB7 | CWHL 2007-16 |
| CWALT 2007-OA11 | CWHL 2004-J6 | CWHL 2005-HYB8 | CWHL 2007-17 |
| CWALT 2007-OA9 | CWHL 2004-J7 | CWHL 2005-HYB9 | CWHL 2007-18 |
| CWALT 2007-OH1 | CWHL 2004-J8 | CWHL 2005-J1 | CWHL 2007-19 |
| CWHL 2004-10 | CWHL 2004-J9 | CWHL 2005-J2 | CWHL 2007-2 |
| CWHL 2004-11 | CWHL 2005-1 | CWHL 2005-J3 | CWHL 2007-20 |
| CWHL 2004-12 | CWHL 2005-10 | CWHL 2005-J4 | CWHL 2007-21 |
| CWHL 2004-13 | CWHL 2005-11 | CWHL 2006-1 | CWHL 2007-3 |
| CWHL 2004-14 | CWHL 2005-12 | CWHL 2006-10 | CWHL 2007-4 |
| CWHL 2004-15 | CWHL 2005-13 | CWHL 2006-11 | CWHL 2007-5 |
| CWHL 2004-16 | CWHL 2005-14 | CWHL 2006-12 | CWHL 2007-6 |
| CWHL 2004-18 | CWHL 2005-15 | CWHL 2006-13 | CWHL 2007-7 |
| CWHL 2004-19 | CWHL 2005-16 | CWHL 2006-14 | CWHL 2007-8 |
| CWHL 2004-2 | CWHL 2005-17 | CWHL 2006-15 | CWHL 2007-9 |
| CWHL 2004-20 | CWHL 2005-18 | CWHL 2006-16 | CWHL 2007-HY1 |
| CWHL 2004-21 | CWHL 2005-2 | CWHL 2006-17 | CWHL 2007-HY3 |
| CWHL 2004-22 | CWHL 2005-20 | CWHL 2006-18 | CWHL 2007-HY4 |
| CWHL 2004-23 | CWHL 2005-21 | CWHL 2006-19 | CWHL 2007-HY5 |
| CWHL 2004-24 | CWHL 2005-22 | CWHL 2006-20 | CWHL 2007-HY6 |
| CWHL 2004-25 | CWHL 2005-23 | CWHL 2006-21 | CWHL 2007-HY7 |
| CWHL 2004-29 | CWHL 2005-24 | CWHL 2006-6 | CWHL 2007-HYB1 |
| CWHL 2004-3 | CWHL 2005-25 | CWHL 2006-8 | CWHL 2007-HYB2 |
| CWHL 2004-4 | CWHL 2005-26 | CWHL 2006-9 | CWHL 2007-J1 |
| CWHL 2004-5 | CWHL 2005-27 | CWHL 2006-HYB1 | CWHL 2007-J2 |
| CWHL 2004-6 | CWHL 2005-28 | CWHL 2006-HYB2 | CWHL 2007-J3 |
| CWHL 2004-7 | CWHL 2005-29 | CWHL 2006-HYB3 | CWHL 2008-1 |
| CWHL 2004-8 | CWHL 2005-3 | CWHL 2006-HYB4 | CWL 2004-S1 |
| CWHL 2004-9 | CWHL 2005-30 | CWHL 2006-HYB5 | |
| CWHL 2004-HYB1 | CWHL 2005-31 | CWHL 2006-J1 | |
| CWHL 2004-HYB2 | CWHL 2005-5 | CWHL 2006-J2 | |
| CWHL 2004-HYB3 | CWHL 2005-6 | CWHL 2006-J3 | |
| CWHL 2004-HYB4 | CWHL 2005-7 | CWHL 2006-J4 | |

<u>Exhibit B:</u> <u>160 OC Undisputed Trusts</u>

| CWALT 2004-6CB | CWHEL 2006-A | CWL 2005-4 | CWL 2006-3 |
|-----------------|---------------|--------------|---------------|
| CWALT 2004-8CB | CWHEL 2007-G | CWL 2005-5 | CWL 2006-4 |
| CWALT 2004-J13 | CWHL 2006-OA4 | CWL 2005-6 | CWL 2006-5 |
| CWALT 2004-J4 | CWL 2004-1 | CWL 2005-7 | CWL 2006-6 |
| CWALT 2004-J5 | CWL 2004-10 | CWL 2005-8 | CWL 2006-7 |
| CWALT 2004-J7 | CWL 2004-11 | CWL 2005-9 | CWL 2006-8 |
| CWALT 2004-J9 | CWL 2004-12 | CWL 2005-AB1 | CWL 2006-9 |
| CWALT 2005-AR1 | CWL 2004-13 | CWL 2005-AB2 | CWL 2006-ABC1 |
| CWALT 2005-J12 | CWL 2004-14 | CWL 2005-AB3 | CWL 2006-BC1 |
| CWALT 2005-J4 | CWL 2004-15 | CWL 2005-AB4 | CWL 2006-BC2 |
| CWALT 2006-HY11 | CWL 2004-2 | CWL 2005-AB5 | CWL 2006-BC3 |
| CWALT 2006-OA11 | CWL 2004-3 | CWL 2005-BC1 | CWL 2006-BC4 |
| CWALT 2006-OA16 | CWL 2004-4 | CWL 2005-BC2 | CWL 2006-BC5 |
| CWALT 2006-OA18 | CWL 2004-5 | CWL 2005-BC3 | CWL 2006-IM1 |
| CWALT 2006-OA22 | CWL 2004-6 | CWL 2005-BC4 | CWL 2006-QH1 |
| CWALT 2006-OA6 | CWL 2004-7 | CWL 2005-BC5 | CWL 2006-SD1 |
| CWALT 2006-OC1 | CWL 2004-8 | CWL 2005-IM1 | CWL 2006-SD2 |
| CWALT 2006-OC10 | CWL 2004-9 | CWL 2005-IM2 | CWL 2006-SD3 |
| CWALT 2006-OC11 | CWL 2004-AB1 | CWL 2005-IM3 | CWL 2006-SD4 |
| CWALT 2006-OC2 | CWL 2004-AB2 | CWL 2005-SD1 | CWL 2006-SPS1 |
| CWALT 2006-OC3 | CWL 2004-BC2 | CWL 2005-SD2 | CWL 2006-SPS2 |
| CWALT 2006-OC4 | CWL 2004-BC3 | CWL 2005-SD3 | CWL 2007-1 |
| CWALT 2006-OC5 | CWL 2004-BC4 | CWL 2006-1 | CWL 2007-10 |
| CWALT 2006-OC6 | CWL 2004-BC5 | CWL 2006-10 | CWL 2007-11 |
| CWALT 2006-OC7 | CWL 2004-ECC1 | CWL 2006-11 | CWL 2007-12 |
| CWALT 2006-OC8 | CWL 2004-ECC2 | CWL 2006-13 | CWL 2007-13 |
| CWALT 2006-OC9 | CWL 2004-SD2 | CWL 2006-14 | CWL 2007-2 |
| CWALT 2007-HY3 | CWL 2004-SD3 | CWL 2006-15 | CWL 2007-3 |
| CWALT 2007-HY6 | CWL 2004-SD4 | CWL 2006-16 | CWL 2007-4 |
| CWALT 2007-HY7C | CWL 2005-1 | CWL 2006-17 | CWL 2007-5 |
| CWALT 2007-HY8C | CWL 2005-10 | CWL 2006-18 | CWL 2007-6 |
| CWALT 2007-HY9 | CWL 2005-11 | CWL 2006-19 | CWL 2007-7 |
| CWALT 2007-J1 | CWL 2005-12 | CWL 2006-2 | CWL 2007-8 |
| CWALT 2007-OA10 | CWL 2005-13 | CWL 2006-20 | CWL 2007-9 |
| CWALT 2007-OA2 | CWL 2005-14 | CWL 2006-21 | CWL 2007-BC1 |
| CWALT 2007-OA4 | CWL 2005-15 | CWL 2006-22 | CWL 2007-BC2 |
| CWALT 2007-OA6 | CWL 2005-16 | CWL 2006-23 | CWL 2007-BC3 |
| CWALT 2007-OA7 | CWL 2005-17 | CWL 2006-24 | CWL 2007-SD1 |
| CWALT 2007-OH2 | CWL 2005-2 | CWL 2006-25 | CWL 2007-SEA1 |
| CWALT 2007-OH3 | CWL 2005-3 | CWL 2006-26 | CWL 2007-SEA2 |