FILED: NEW YORK COUNTY CLERK 11/03/2014 03:23 PM

NYSCEF DOC. NO. 113

INDEX NO. 652382/2014
RECEIVED NYSCEF: 11/03/2014

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

----- X

In the matter of the application of

Index No. 652382/2014

Part 60

U.S. BANK NATIONAL ASSOCIATION, THE
BANK OF NEW YORK MELLON, THE BANK OF
NEW YORK MELLON TRUST COMPANY, N.A.,
WILMINGTON TRUST, NATIONAL
ASSOCIATION, LAW DEBENTURE TRUST
COMPANY OF NEW YORK, WELLS FARGO
BANK, NATIONAL ASSOCIATION, HSBC BANK
USA, N.A., AND DEUTSCHE BANK NATIONAL
TRUST COMPANY (as trustees under various Pooling:

Hon. Marcy S. Friedman

Petitioners,

various Indentures).

for an order, pursuant to CPLR § 7701, seeking judicial: instruction.

and Servicing Agreements and indenture trustees under:

NOTICE OF INTENTION TO OBJECT

Pursuant to the Court's Order dated August 15, 2014, QVT Fund V LP, QVT Fund IV LP and Quintessence Fund L.P. (collectively, the "QVT Funds"), by and through their undersigned counsel, hereby give notice of their intention to object to the proposed settlement entered into by Petitioners U.S. Bank National Association, The Bank of New York Mellon, The Bank of New York Mellon Trust Company, N.A., Wilmington Trust, National Association, Law Debenture Trust Company of New York, Wells Fargo Bank, National Association, HSBC Bank U.S.A., N.A., and Deutsche Bank National Trust Company (the "Trustees") and JPMorgan Chase & Co. and its affiliates ("JPMorgan"), with respect to which the Trustees filed their Petition in this action seeking judicial instructions and approval pursuant to Article 77 of the New York Civil Procedure Law and Rules (the "Proposed Settlement").

The preliminary grounds for the QVT Funds' objection to the Proposed Settlement are set forth in the QVT Funds' Memorandum of Law in Support of their Motion to Intervene, filed on October 31, 2014. The QVT Funds reserve the right to object to the Proposed Settlement on other grounds if appropriate based on additional information made available by the Trustees or produced by any party in this action.

Dated: New York, New York

November 3, 2014

WOLLMUTH MAHER & DEUTSCH LLP

Thomas P Ogden David H. Wollmuth Michael C. Ledley Devika Persaud

500 Fifth Avenue New York, New York 10110

Tel: (212) 382-3300

Attorneys for QVT Fund V LP, QVT Fund IV LP and Quintessence Fund L.P.