

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

In the matter of the application of

WELLS FARGO BANK, NATIONAL ASSOCIATION,  
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,  
HSBC BANK USA, N.A., and DEUTSCHE BANK  
NATIONAL TRUST COMPANY (as Trustees, Indenture  
Trustees, Securities Administrators, Paying Agents, and/or  
Calculation Agents of Certain Residential Mortgage-  
Backed Securitization Trusts),

Petitioners,

For Judicial Instructions under CPLR Article 77 on the  
Distribution of a Settlement Payment.

Index No. 657387/2017

**NOTICE OF MOTION  
SEEKING ENTRY OF  
PARTIAL SEVERANCE  
ORDER AND PARTIAL  
FINAL JUDGMENT**

**(GPMF 2006-AR2 - Loan  
Groups III and IV)**

**PLEASE TAKE NOTICE** that, upon the accompanying attorney affirmation of E. Page Allinson, counsel for DW Partners LP (“DW”), DW, Tilden Park Investment Master Fund LP, Tilden Park Management I LLC, and Tilden Park Capital Management LP (each on behalf of themselves and their advisory clients “Tilden Park”), and Ambac Assurance Corporation (“Ambac”), with the consent of the Institutional Investors,<sup>1</sup> Nover Ventures, LLC (“Nover”), and AIG,<sup>2</sup> will move this Court before the Honorable Melissa A. Crane on August 22, 2022 at 9:30 a.m., or as soon thereafter as counsel may be heard, at the Motion Support Office, Room 130 of the Courthouse of the Supreme Court of the State of New York, 60 Centre Street, New York, New York 10007, for an order seeking the entry a Partial Severance Order and Partial Final

<sup>1</sup> All references to the ‘Institutional Investors’ include each and every one of the sixteen institutions identified in the Institutional Investors’ Notice of Appearance (NYSCEF No. 135).

<sup>2</sup> All references to “AIG” in this Partial Severance Order and Partial Final Judgment include each and every one of the six interested persons identified in AIG’s Notice of Appearance (Dkt. No. 185).

Judgment concerning GPMF 2006-AR2, Loan Groups III and IV. A copy of a Proposed Order is attached hereto.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to CPLR 2214(b), answering papers, if any on this motion, are required to be served no later than two (2) days prior to the return date of this motion.

Dated: New York, New York  
August 12, 2022

**BAILEY DUQUETTE P.C.**

/s/ David I. Greenberger

David I. Greenberger, Esq.  
104 Charlton Street  
Suite 1W  
New York, New York 10014  
Tel: (212) 658-1946

**PERRY, JOHNSON, ANDERSON,  
MILLER & MOSKOWITZ, LLP**

Isaac M. Gradman, *pro hac vice*  
E. Page Allinson, *pro hac vice*  
438 First Street, 4<sup>th</sup> Floor  
Santa Rosa, CA 95401  
Tel: (707) 525-8800

*Attorneys for DW Partners LP*

**SCHINDLER COHEN & HOCHMAN  
LLP**

/s/ Jonathan L. Hochman

Jonathan L. Hochman  
Anna Vinogradov  
Schindler Cohen & Hochman LLP  
100 Wall Street  
15th Floor  
New York, N.Y. 10005  
T: (212) 277 6330  
F: (212) 277 6333  
jhochman@schlaw.com  
avinogradov@schlaw.com

**KRAMER LEVIN NAFTALIS &  
FRANKEL LLP**

Philip Bentley  
Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas  
New York, N.Y. 10036  
(212) 715 9100  
(212) 715 8000  
pbentley@kramerlevin.com

*Attorneys for Tilden Park*

**PATTERSON BELKNAP WEBB &  
TYLER LLP**

/s/ Henry J. Ricardo

Henry J. Ricardo  
1133 Avenue of the Americas  
New York, New York 10036  
Tel: (212) 336-2000

*Attorneys for Ambac Assurance Corporation*