

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

In the matter of the application of

U.S. BANK NATIONAL ASSOCIATION, WELLS FARGO BANK, NATIONAL ASSOCIATION, WILMINGTON TRUST, NATIONAL ASSOCIATION, WILMINGTON TRUST COMPANY, and CITIBANK, NATIONAL ASSOCIATION (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 Administration and Distribution of a Settlement Payment.

Index No. 651625/2018

**AFFIRMATION OF  
ZACHARY G. NEWMAN  
IN SUPPORT OF  
APPLICATION FOR  
ADMISSION PRO HAC VICE**

**ZACHARY G. NEWMAN**, an attorney duly admitted to practice law in the Courts of the State of New York, hereby affirms the following under the penalties of perjury, pursuant to CPLR § 2106:

1. I am a member of Hahn & Hessen LLP, New York counsel for Petitioner Wells Fargo Bank, National Association (“Wells Fargo”), and, in that capacity, I have personal knowledge of the facts set forth herein. I respectfully submit this affirmation in support of Wells Fargo’s application, by Order to Show Cause, (the “Application”) for an Order, pursuant to 22 N.Y.C.R.R. §§ 520.11 and 602.2(a), admitting Robert L. Schnell, Jr, Stephen M. Mertz, Michael F. Doty and Ryan G. Milligan as counsel *pro hac vice* to represent Petitioner Wells Fargo, together with Hahn & Hessen LLP, in the above-referenced action.

2. As evidenced by their respective Certificates of Good Standing attached to their accompany affidavits, Mr. Schnell, Mr. Mertz and Mr. Doty active members in good standing of the Minnesota State Bar, having been admitted to practice law in Minnesota on September 16, 1974; October 26, 1990 and October 26, 2007, respectively, and Mr. Milligan is an active

member in good standing of the Indiana, Illinois and Michigan State Bars, having been admitted to practice law in Indiana on October 16, 2009; Illinois on August 29, 2017 and Michigan on February 13, 2017.

3. Each of their affidavits states that he or she: (a) is familiar with and shall comply with the standards of professional conduct imposed upon members of the New York State Bar, including the rules of court governing the conduct of attorneys and the Rules of Professional Conduct; (b) shall be subject to the jurisdiction of the courts of the State of New York with respect to any acts occurring during the course of his or her participation in the above-captioned matter; (c) shall be subject to all disciplinary rules and regulations of the courts of the State of New York; and (d) will notify this Court immediately of any matter affecting his or her standing with their respective state bars.

4. Accompanying this affirmation is a proposed order admitting Mr. Schnell, Mr. Mertz, Mr. Doty and Mr. Milligan *pro hac vice*.

**WHEREFORE**, it is respectfully requested that Wells Fargo's Application for an Order, pursuant to 22 N.Y.C.R.R. §§ 520.11 and 602.2(a), admitting Robert L. Schnell, Jr, Stephen M. Mertz, Michael F. Doty and Ryan G. Milligan as counsel *pro hac vice* to represent Petitioner Wells Fargo in the above action be granted in its entirety.

Dated: New York, New York  
April 10, 2018

/s/ Zachary G. Newman  
**ZACHARY G. NEWMAN**