

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

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ROYAL PARK INVESTMENTS SA/NV,  
Plaintiff,

-against-

BANK OF AMERICA CORP., NB HOLDINGS CORP.,  
COUNTRYWIDE FINANCIAL CORP., COUNTRYWIDE  
SECURITIES CORP., COUNTRYWIDE HOME LOANS,  
INC., BAC HOME LOANS SERVICING LP f/k/a  
COUNTRYWIDE HOME LOANS SERVICING, LP,  
CWALT, INC., CWABS, INC., CWMBS, INC., and  
CWHEQ, INC.,

Defendants.

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**SUMMONS WITH  
NOTICE**

Plaintiff designates New York  
County as the place of trial.

The basis of venue is CPLR  
Article 5, including CPLR 501,  
503, and 509

Bank of America Corp. 1 Bryant Park New York, NY 10036	NB Holdings Corp., c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801	Countrywide Financial Corp. 4500 Park Granada Calabasas, CA 91302
Countrywide Home Loans Inc. 4500 Park Granada Calabasas, CA 91302	Countrywide Securities Corp. 4500 Park Granada Calabasas, CA 91302	BAC Home Loans Servicing LP f/k/a Countrywide Home Loans Servicing LP 1 Bryant Park New York, NY 10036
CWALT, Inc. 4500 Park Granada Calabasas, CA 91302	CWABS, Inc. 4500 Park Granada Calabasas, CA 91302	CWMBS, Inc. 4500 Park Granada Calabasas, CA 91302
CWHEQ, Inc. 4500 Park Granada Calabasas, CA 91302		

**TO THE ABOVE-NAMED DEFENDANTS:**

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED and  
required to serve upon Plaintiff's attorneys a notice of appearance or demand for a

complaint within twenty (20) days after service of this Summons With Notice, exclusive of the day of service, or within thirty (30) days after service is complete if this Summons is not personally delivered to you within the State of New York. In case of your failure to appear or answer, judgment will be taken against you on default for the relief demanded herein.

Plaintiff designates New York County as the place of trial. Venue is proper because Defendants do substantial business in this County, and/or derive substantial revenue from activities carried out in this County and/or are New York corporations and many of the wrongful acts alleged herein occurred in this County. Defendant Countrywide Home Loans, Inc is a New York Corporation. Countrywide Securities Corp. has a principal place of business in both California and New York County. Defendants Bank of America Corp. and BAC Home Loans Servicing LP have substantial business operations and maintain offices at the Bank of America Tower in New York County.

Plaintiff Royal Park Investments SA/NV ("RPI") is a corporation formed under the laws of Belgium, with a notice address of Business Center Van Orley, rue Van Orleystraat 15, 1000 Brussels, Belgium.

#### **NOTICE**

This is an action for damages arising from Plaintiff's investment in residential mortgage-backed securities (the "Securities") which were originated, securitized, underwritten, issued, deposited, serviced, participated in, and/or sold by Defendants, Defendants' agents and/or Defendants' predecessors-in-interest. The Securities were purchased in the offerings listed in Schedule A (the "Offerings") and had a total par value of \$1,568,806,000. The Securities are either currently held by Plaintiff or were held and

sold previously at a loss, totaling at least \$713,532,475.18. Plaintiff and its agents acquired the Securities, and all legal rights and causes of action thereto, from third parties pursuant to certain purchase and sale and/or assignment agreements. The Securities were initially purchased by the third parties identified in the Schedule A attached hereto as the "Purchaser" and then all right, title, interest and causes of action in and to the Securities were assigned to Plaintiff.

Defendants were actively involved in each step of the securitization and sale of the Securities to Plaintiff. Defendants acted as originator, securitizer, issuer, servicer, depositor, underwriter, seller, sponsor, and/or broker-dealer for the Offerings. The offering materials issued by Defendants for the Offerings—including, without limitation, pitch books, term sheets, registration statements, draft prospectuses (including but not limited to "red" and "pink" prospectuses), draft prospectus supplements, electronic summaries of loan data, prospectuses and prospectus supplements (the "Offering Materials")—contained material misrepresentations and omissions regarding (1) the underwriting standards used to issue the mortgage loans that were pooled together into the Offerings, (2) the legal validity of assignments of those mortgage loans to trusts formed to hold the pooled loans and to collect interest and principal payments due on the loans, and (3) the legal validity of the trusts and their legal entitlement to receive interest and principal payments on the loans.

The Offering Materials also contained material misrepresentations and omissions regarding key statistical characteristics of the mortgage loans underlying the Securities, including but not limited to the loans' loan-to-value ratios and combined loan-to-value ratios, as well as the percentage of owner-occupied properties. The Offering Materials

also contained material misrepresentations about the Securities' credit ratings, which understated the Securities' risk profile.

Each of the Defendants knew, or at a minimum was negligent in not knowing, that its representations and omissions were false and/or misleading at the time they were made. Each Defendant made the false and/or misleading statements with the intent for Plaintiff to rely upon those statements. Defendants obtained mortgage loans from the originators and created securities from them. The underwriters underwrote the Offerings and sold the Securities to Plaintiff by means of Offering Materials which contained knowing material misrepresentations and omissions.

Plaintiff did not know the true facts regarding Defendants' misrepresentations and omissions in the Offering Materials, and justifiably relied on those misrepresentations and omissions. Defendants' wrongdoing has led directly to Plaintiff's damages, which include loss of market value on the Securities. Plaintiff's causes of action against Bank of America Corp., NB Holdings Corp., Countrywide Financial Corp., Countrywide Securities Corp., Countrywide Home Loans, Inc., BAC Home Loans Servicing LP f/k/a Countrywide Home Loans Servicing LP, CWALT Inc., CWABS, Inc., CWMBS, Inc., and CWHEQ, Inc. are at law and at equity for claims including common-law fraud, fraudulent inducement, negligent misrepresentation, and aiding and abetting fraud. The above-referenced Defendants are liable, both directly and under a theory of successor liability, as originators, securitizers, depositors, issuers, underwriters, servicers, sellers, sponsors, participants, and/or aiders and abettors for the above-referenced claims.

The Bank of America defendant entities are liable under one or more theories of successor liability, including without limitation, actual or constructive fraudulent conveyance, assumption of liabilities, and/or *de facto* merger.

Upon your failure to appear, judgment will be taken against you by default for money damages in an amount of at least \$713,532,475.18 and interest thereon, together with punitive damages, legal fees, the costs of this action and such other and further relief as this Court may deem just and proper.

### JURY TRIAL DEMAND

Plaintiff respectfully requests a jury trial for the adjudication of all claims for which a jury is available.

Dated: New York, New York  
October 26, 2012

GUZOV, LLC

By: 

Debra J. Guzov, Esq.

Anne W. Salisbury, Esq.

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Washington, DC 20008

## Schedule A

CUSIP	Security	Class	Depositor	Nominal (Par) Amount	Purchaser	Purchase Date
23244GAE2	CWALT 2006-OA18	A2	CWALT, Inc.	\$25,000,000	Fortis Bank SA/NV	11/15/2006
12668RAB4	CWALT 2006-OA19	A2	CWALT, Inc.	\$30,000,000	SCALDIS CAPITAL LIMITED	11/30/2006
12668ABP9	CWALT 2005-J10	1A17	CWALT, Inc.	\$18,730,000	Fortis Proprietary Investment (Ireland) Limited	12/4/2006
12668BFH1	CWALT 2005-86CB	A8	CWALT, Inc.	\$10,000,000	Fortis Proprietary Investment (Ireland) Limited	12/20/2006
12667TAE5	CWL 2006-25	2A4	CWABS, Inc.	\$25,000,000	SCALDIS CAPITAL LIMITED	12/29/2006
12668BJZ7	CWALT 2006-J1	1A3	CWALT, Inc.	\$12,265,000	Fortis Proprietary Investment (Ireland) Limited	1/9/2007
23245QAF6	CWALT 2006-OA21	M1	CWALT, Inc.	\$7,799,000	FORTIS BANK SA/NV	1/19/2007
12668APY5	CWALT 2005-54CB	3A13	CWALT, Inc.	\$83,447,000	Fortis Proprietary Investment (Ireland) Limited	1/26/2007
23246KAC5	CWALT 2007-1T1	1A3	CWALT, Inc.	\$50,000,000	FORTIS PROPRIETARY INVESTMENT (IRELAND) LIMITED	1/30/2007
23245CAE0	CWL 2007-1	2A4	CWABS, Inc.	\$25,000,000	FORTIS BANK SA/NV	2/9/2007
12668APY5	CWALT 2005-54CB	3A13	CWALT, Inc.	\$45,000,000	FORTIS PROPRIETARY INVESTMENT (IRELAND) LIMITED	2/23/2007

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<b>CUSIP</b>	<b>Security</b>	<b>Class</b>	<b>Depositor</b>	<b>Nominal (Par) Amount</b>	<b>Purchaser</b>	<b>Purchase Date</b>
02148FAC9	CWALT 2007-4CB	1A3	CWALT, Inc.	\$35,000,000	SCALDIS CAPITAL LIMITED	2/28/2007
12668NAE7	CWL 2007-2	2A4	CWABS, Inc.	\$15,000,000	SCALDIS CAPITAL LIMITED	2/28/2007
12668NAH0	CWL 2007-2	M3	CWABS, Inc.	\$5,520,000	Fortis Bank SA NV, Cayman Branch	2/28/2007
12668NAG2	CWL 2007-2	M2	CWABS, Inc.	\$5,500,000	Fortis Bank SA NV, Cayman Branch	2/28/2007
12668TAG9	CWL 2007-BC1	M2	CWABS, Inc.	\$8,625,000	Fortis Bank SA NV, Cayman Branch	2/28/2007
12668UAH4	CWL 2007-3	2A4	CWABS, Inc.	\$29,661,000	FORTIS BANK SA/NV	3/29/2007
12668UAJ0	CWL 2007-3	M1	CWABS, Inc.	\$5,000,000	Fortis Bank SA NV, Cayman Branch	3/29/2007
12668UAK7	CWL 2007-3	M2	CWABS, Inc.	\$5,000,000	Fortis Bank SA NV, Cayman Branch	3/29/2007
12668OAF4	CWALT 2007-OA7	A3	CWALT, Inc.	\$30,000,000	FORTIS BANK SA/NV	3/30/2007
12668OAH0	CWALT 2007-OA7	M1	CWALT, Inc.	\$7,000,000	FORTIS BANK SA/NV	3/30/2007
12669LAE0	CWL 2007-6	2A4	CWABS, Inc.	\$32,768,000	FORTIS BANK SA/NV	3/30/2007
12668OAH0	CWALT 2007-OA7	M1	CWALT, Inc.	\$3,752,000	Fortis Bank SA NV, Cayman Branch	3/30/2007



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CUSIP	Security	Class	Depositor	Nominal (Par) Amount	Purchaser	Purchase Date
12668KAF0	CWL 2007-5	M1	CWABS, Inc.	\$7,000,000	Fortis Bank SA NV, Cayman Branch	3/30/2007
12669LAH3	CWL 2007-6	M3	CWABS, Inc.	\$6,000,000	Fortis Bank SA NV, Cayman Branch	3/30/2007
12669LAJ9	CWL 2007-6	M4	CWABS, Inc.	\$5,500,000	Fortis Bank SA NV, Cayman Branch	3/30/2007
12668KAG8	CWL 2007-5	M2	CWABS, Inc.	\$5,000,000	Fortis Bank SA NV, Cayman Branch	3/30/2007
12667GKA0	CWALT 2005-21CB	A1	CWALT, Inc.	\$26,350,000	FORTIS PROPRIETARY INVESTMENT (IRELAND) LIMITED	4/3/2007
02150JAU6	CWALT 2007-9T1	2A2	CWALT, Inc.	\$75,000,000	FORTIS PROPRIETARY INVESTMENT (IRELAND) LIMITED	4/3/2007
02148FAC9	CWALT 2007-4CB	1A3	CWALT, Inc.	\$10,000,000	SCALDIS CAPITAL LIMITED	4/24/2007
12669QAG4	CWL 2007-BC2	M2	CWABS, Inc.	\$9,150,000	Fortis Bank SA NV, Cayman Branch	4/27/2007
12669QAF6	CWL 2007-BC2	M1	CWABS, Inc.	\$4,000,000	Fortis Bank SA NV, Cayman Branch	4/27/2007

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CUSIP	Security	Class	Depositor	Nominal (Par) Amount	Purchaser	Purchase Date
12668AC60	CWALT 2005-J13	2A3	CWALT, Inc.	\$24,000,000	FORTIS PROPRIETARY INVESTMENT (IRELAND) LIMITED	5/1/2007
02150PAF5	CWALT 2007-OA6	M1	CWALT, Inc.	\$3,980,000	Fortis Bank SA NV, Cayman Branch	5/1/2007
12669VAF5	CWL 2007-7	M1	CWABS, Inc.	\$12,000,000	Fortis Bank SA NV, Cayman Branch	5/4/2007
12669VAG3	CWL 2007-7	M2	CWABS, Inc.	\$7,000,000	Fortis Bank SA NV, Cayman Branch	5/4/2007
02150LBG1	CWALT 2007-12T1	A22	CWALT, Inc.	\$77,510,000	FORTIS PROPRIETARY INVESTMENT (IRELAND) LIMITED	5/16/2007
02146QAM5	CWALT 2006-OA10	M2	CWALT, Inc.	\$4,150,000	Fortis Bank SA NV, Cayman Branch	5/17/2007
02150KAC3	CWALT 2007-OH1	A3	CWALT, Inc.	\$30,000,000	FORTIS BANK SA/NV	5/30/2007
12545EAB2	CWHL 2007-J2	2A1	CWMBS, Inc.	\$100,000,000	SCALDIS CAPITAL LIMITED	5/30/2007
12669WAG1	CWL 2007-8	M1	CWABS, Inc.	\$6,000,000	Fortis Bank SA NV, Cayman Branch	5/31/2007
12669WAH9	CWL 2007-8	M2	CWABS, Inc.	\$3,000,000	Fortis Bank SA NV, Cayman Branch	5/31/2007

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<b>CUSIP</b>	<b>Security</b>	<b>Class</b>	<b>Depositor</b>	<b>Nominal (Par) Amount</b>	<b>Purchaser</b>	<b>Purchase Date</b>
12669WAJ5	CWL 2007-8	M3	CWABS, Inc.	\$2,000,000	Fortis Bank SA NV, Cayman Branch	5/31/2007
12669WAL0	CWL 2007-8	M5	CWABS, Inc.	\$1,500,000	Fortis Bank SA NV, Cayman Branch	5/31/2007
12670FAG5	CWL 2007-9	M2	CWABS, Inc.	\$7,500,000	Fortis Bank SA NV, Cayman Branch	6/8/2007
12670FAH3	CWL 2007-9	M3	CWABS, Inc.	\$3,000,000	Fortis Bank SA NV, Cayman Branch	6/8/2007
02151CBH8	CWALT 2007-15CB	A23	CWALT, Inc.	\$36,556,000	FORTIS PROPRIETARY INVESTMENT (IRELAND) LIMITED	6/11/2007
12545EAJ5	CWHL 2007-J2	2A8	CWMBS, Inc.	\$51,456,000	FORTIS PROPRIETARY INVESTMENT (IRELAND) LIMITED	6/11/2007
126694WK0	CWHL 2006-HYB1	2A2B	CWMBS, Inc.	\$33,372,000	FORTIS PROPRIETARY INVESTMENT (IRELAND) LIMITED	6/29/2007
23246LAF6	CWL 2007-BC3	M1	CWABS, Inc.	\$25,012,000	Fortis Bank SA NV, Cayman Branch	6/29/2007
23246BAP6	CWL 2007-10	2M2	CWABS, Inc.	\$5,200,000	Fortis Bank SA NV, Cayman Branch	6/29/2007

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CUSIP	Security	Class	Depositor	Nominal (Par) Amount	Purchaser	Purchase Date
23246BAM3	CWL 2007-10	2M1	CWABS, Inc.	\$3,200,000	Fortis Bank SA NV, Cayman Branch	6/29/2007
12668RAK4	CWALT 2006-OA19	M2	CWALT, Inc.	\$10,000,000	FORTIS BANK SA/NV	7/3/2007
02150YAA7	CWALT 2007-OA9	A1	CWALT, Inc.	\$40,000,000	SCALDIS CAPITAL LIMITED	8/9/2007
02151RAA1	CWALT 2007-OH2	A1A	CWALT, Inc.	\$23,264,000	SCALDIS CAPITAL LIMITED	8/9/2007
12668AHE8	CWALT 2005-56	5A1	CWALT, Inc.	\$40,000,000	FORTIS BANK SA/NV	8/27/2007
12668FAB0	CWHEL 2006-I	2A	CWHEQ, Inc.	\$65,720,000	FORTIS BANK SA/NV	10/31/2007
126673B43	CWL 2005-3	MV1	CWABS, Inc.	\$5,980,000	CFTN 2006-1A CDO	7/17/2007
126673U91	CWL 2005-5	M2	CWABS, Inc.	\$6,600,000	CFTN 2006-1A CDO	7/17/2007
12667GPU1	CWALT 2005-20CB	1A2	CWALT, Inc.	\$10,000,000	PINCL 2006-1A CDO	On or after 5/26/2005
12668BVC4	CWALT 2006-9T1	A3	CWALT, Inc.	\$10,000,000	PINCL 2006-1A CDO	On or after 3/30/2006
12667TAG0	CWL 2006-25	M2	CWABS, Inc.	\$11,600,000	PINCL 2006-1A CDO	12/29/2006
12666TAD8	CWL 2006-11	1AF4	CWABS, Inc.	\$15,000,000	PINCL 2006-1A CDO	On or after 6/29/2006
23243LAE2	CWL 2006-14	M1	CWABS, Inc.	\$12,000,000	PINCL 2006-1A CDO	On or after 9/8/2006

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CUSIP	Security	Class	Depositor	Nominal (Par) Amount	Purchaser	Purchase Date
12666VAE1	CWL 2006-17	M1	CWABS, Inc.	\$11,400,000	PINCL 2006-1A CDO	On or after 9/25/2006
12666CAK9	CWL 2006-23	M5	CWABS, Inc.	\$3,000,000	NASS 2006-1A CDO	On or after 12/8/2006
12666CAK9	CWL 2006-23	M5	CWABS, Inc.	\$7,000,000	CFTN 2006-1A CDO	12/8/2006
23243HAG6	CWL 2006-24	M2	CWABS, Inc.	\$9,336,000	PINCL 2006-1A CDO	12/29/2006
12666VAH4	CWL 2006-17	M4	CWABS, Inc.	\$8,750,000	CFTN 2006-1A CDO	3/26/2007
12667OZJ0	CWL 2006-6	1A1M	CWABS, Inc.	\$30,000,000	CFTN 2006-1A CDO	7/30/2007
12666BAG0	CWL 2006-22	M2	CWABS, Inc.	\$6,560,000	PINCL 2006-1A CDO	On or after 11/30/2006
12667LAJ1	CWL 2006-21	M4	CWABS, Inc.	\$6,000,000	CFTN 2006-1A CDO	11/30/2006
12666BAJ4	CWL 2006-22	M4	CWABS, Inc.	\$5,000,000	CFTN 2006-1A CDO	11/30/2006
12666CAG8	CWL 2006-23	M2	CWABS, Inc.	\$5,000,000	PINCL 2006-1A CDO	12/8/2006
126670WW4	CWL 2006-4	M2	CWABS, Inc.	\$4,000,000	PINCL 2006-1A CDO	On or after 3/17/2006
12668BF24	CWALT 2006-OA6	M1	CWALT, Inc.	\$5,000,000	CFTN 2006-1A CDO	3/26/2007

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12667HAG6	CWL 2006-20	M2	CWABS, Inc.	\$3,250,000	PINCL 2006-1A CDO	On or after 11/8/2006
12668HAL4	CWL 2006-26	M6	CWABS, Inc.	\$3,000,000	NASS 2006-1A CDO	12/29/2006
12668HAH3	CWL 2006-26	M3	CWABS, Inc.	\$3,000,000	PINCL 2006-1A CDO	12/29/2006
23245PAE1	CWALT 2006-OA22	M1	CWALT, Inc.	\$2,500,000	CFTN 2006-1A CDO	3/26/2007
23244GAG7	CWALT 2006-OA18	M1	CWALT, Inc.	\$3,840,000	CFTN 2006-1A CDO	3/26/2007
23244GAH5	CWALT 2006-OA18	M2	CWALT, Inc.	\$8,551,000	CFTN 2006-1A CDO	3/26/2007
02146YAL0	CWALT 2006-OA9	M1	CWALT, Inc.	\$7,500,000	CFTN 2006-1A CDO	3/26/2007
23245QAH2	CWALT 2006-OA21	M3	CWALT, Inc.	\$3,362,000	NASS 2006-1A CDO	1/19/2007
23245QAJ8	CWALT 2006-OA21	M4	CWALT, Inc.	\$3,500,000	NASS 2006-1A CDO	1/19/2007
23245QAK5	CWALT 2006-OA21	M5	CWALT, Inc.	\$3,500,000	NASS 2006-1A CDO	1/19/2007
12668RAN8	CWALT 2006-OA19	M5	CWALT, Inc.	\$4,500,000	NASS 2006-1A CDO	11/30/2006
12668BSA2	CWALT 2006-6CB	1A5	CWALT, Inc.	\$15,000,000	PINCL 2006-1A CDO	On or after 3/30/2006
12668BSP9	CWALT 2006-6CB	2A9	CWALT, Inc.	\$10,000,000	PINCL 2006-1A CDO	On or after 3/30/2006
02147CAH6	CWALT 2006-OA8	2A5	CWALT, Inc.	\$6,000,000	CFTN 2006-1A CDO	3/26/2007

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CUSIP	Security	Class	Depositor	Nominal (Par) Amount	Purchaser	Purchase Date
23246BAS0	CWL 2007-10	M4	CWABS, Inc.	\$13,500,000	CFTN 2006-1A CDO	6/29/2007
23247LAL2	CWL 2007-11	M4	CWABS, Inc.	\$10,400,000	CFTN 2006-1A CDO	7/5/2007
12669WAK2	CWL 2007-8	M4	CWABS, Inc.	\$3,000,000	CFTN 2006-1A CDO	5/31/2007
12669LAJ9	CWL 2007-6	M4	CWABS, Inc.	\$6,000,000	CFTN 2006-1A CDO	3/30/2007
02150PAJ7	CWALT 2007-OA6	M4	CWALT, Inc.	\$7,690,000	CFTN 2006-1A CDO	5/3/2007
23243WAF5	CWL 2006-18	M2	CWABS, Inc.	\$2,500,000	CFTN 2006-1A CDO	7/24/2007