

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

SEALINK FUNDING LIMITED,

Plaintiff,

- against -

CITIGROUP INC., CITIGROUP GLOBAL
MARKETS INC., CITIGROUP MORTGAGE LOAN
TRUST INC. and CITIGROUP GLOBAL MARKETS
REALTY CORP.,

Defendants.

Index No.

Summons with Notice**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, 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 are principally located in this County, and many of the wrongful acts alleged herein occurred in this County.

NOTICE

This is an action for damages, or alternatively, rescission, and/or a declaratory judgment arising from Plaintiff's investment in residential mortgage-backed securities (the "Securities") which were securitized by Defendants and sold to Plaintiff by Defendants. Plaintiff purchased

\$513,331,000 in Securities in the offerings listed on Exhibit A attached hereto (the “Offerings”). The Securities are either currently held by Plaintiff or were held and sold previously at a loss.

Defendants were actively involved in each step of the securitization and sale of the Securities to Plaintiff. Defendants acted as depositor, underwriter, seller, sponsor, and/or broker-dealer for the Offerings.

The offering materials issued by Defendants for the Offerings (the “Offering Materials”) contained material misrepresentations and omissions regarding the underwriting standards used to issue the mortgage loans that were pooled together into the Offerings, the transfer of those mortgage loans to trusts formed to hold the pooled loans and to collect interest and principal payments due on the loans, and 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 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.

Alternatively, if the underwriters did not know of material misrepresentations and omissions, then contracts of sale from the underwriters to Plaintiff are void or voidable as a result of mutual mistake.

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 Citigroup Inc. are at law and at equity for claims including common law fraud, fraudulent inducement, negligent misrepresentation, aiding and abetting fraud, declaratory judgment, and contract claims including rescission, restitution and mutual mistake. The depositors identified in Exhibit A are liable for claims including common law fraud, fraudulent inducement, and negligent misrepresentation. The sponsors identified in Exhibit A are liable for claims including common law fraud, fraudulent inducement, and negligent misrepresentation. The underwriter identified in Exhibit A is liable for claims including common law fraud, aiding and abetting fraud, negligent misrepresentation, and contract claims including rescission, restitution and mutual mistake.

Upon your failure to appear, judgment will be taken against you by default for money damages in an amount of at least \$513,331,000, and interest thereon, together with punitive damages of \$513,331,000, rescission, rescissory damages, legal fees, and the costs of this action.

Dated: New York, New York
November 7, 2012

LABATON SUCHAROW LLP

By: /s/ Joel H. Bernstein
Joel H. Bernstein
David J. Goldsmith
140 Broadway
New York, New York 10005
(212) 907-0700

*Attorneys for Plaintiff
Sealink Funding Limited*

EXHIBIT A

Start Date	CUSIP	Issuing Entity	Short Name	Tranche	Sponsor	Underwriter	Depositor	Original Position
02/22/2006	61915RBZ8	MortgageIT Mortgage Loan Trust 2006-1	MHL 2006-1	1A2	MortgageIT, Inc.	Greenwich Capital Markets, Inc.	Greenwich Capital Acceptance, Inc.	\$77,047,000
04/06/2006	83611MNE4	Soundview Home Loan Trust 2006-2	SVHE 2006-2	A3	Greenwich Capital Financial Products, Inc.	Greenwich Capital Markets, Inc.	Financial Asset Securities Corp.	\$70,000,000
04/07/2006	83611MMK1	Soundview Home Loan Trust 2006- OPT2	SVHE 2006- OPT2	A3	Option One Mortgage Corporation	Greenwich Capital Markets, Inc.	Financial Asset Securities Corp.	\$40,000,000
08/17/2006	83612HAC2	Soundview Home Loan Trust 2006-3	SVHE 2006-3	A3	Greenwich Capital Financial Products, Inc.	Greenwich Capital Markets, Inc.	Financial Asset Securities Corp.	\$37,000,000
09/15/2006	83612IAC8	Soundview Home Loan Trust 2006-EQ1	SVHE 2006-EQ1	A3	Greenwich Capital Financial Products, Inc.	Greenwich Capital Markets, Inc.	Financial Asset Securities Corp.	\$43,750,000
05/15/2007	83612TAC6	Soundview Home Loan Trust 2007- OPT1	SVHE 2007- OPT1	2A2	Greenwich Capital Financial Products, Inc.	Greenwich Capital Markets, Inc.	Financial Asset Securities Corp.	\$41,843,000
05/09/2006	75156VAC9	RAMP Series 2006-RS3 Trust	RAMP 2006-RS3	A3	Residential Funding Corporation	Greenwich Capital Markets, Inc.	Residential Asset Mortgage Products, Inc.	\$75,000,000
08/29/2006	75156YAC3	RAMP Series 2006-RS5 Trust	RAMP 2006-RS5	A3	Residential Funding Corporation	Greenwich Capital Markets, Inc.	Residential Asset Mortgage Products, Inc.	\$60,000,000
05/25/2006	04012XAD7	Argent Securities Trust	ARSI 2006-W5	A2C	Amerquest Mortgage	Greenwich Capital Markets, Inc.	Argent Securities	\$45,000,000

09/27/2006	03076MAD6	2006-W5 Argent Securities Trust 2006-M3	ARSI 2006-M3	A2C		Amerquest Mortgage Company	Greenwich Capital Markets, Inc.	Argent Securities Inc.	\$81,127,000
11/30/2006	66988RAD9	NovaStar Mortgage Funding Trust, Series 2006-6	NHEL 2006-6	A2C		NovaStar Mortgage, Inc.	Greenwich Capital Markets, Inc.	NovaStar Mortgage Funding Corporation	\$40,000,000
05/10/2006	35729RAE6	Fremont Home Loan Trust 2006-A	FHLT 2006-A	2A3		Fremont Investment & Loan	Greenwich Capital Markets, Inc.	Financial Asset Securities Corp.	\$40,000,000
02/28/2007	669971AD5	NovaStar Mortgage Funding Trust, Series 2007-A	NHEL 2007-1	A2C		NovaStar Mortgage, Inc.	Deutsche Bank Securities Inc.; Greenwich Capital Markets, Inc.; Wachovia Securities	NovaStar Mortgage Funding Corporation	\$40,000,000
02/7/2007	63860HAD1	Nationstar Home Equity Loan Trust 2007-A	NSTR 2007-A	AV4		Nationstar Mortgage LLC	Citigroup Global Markets Inc.; Greenwich Capital Markets, Inc.; Banc of America Securities LLC; Credit Suisse Securities (USA) LLC	Nationstar Funding LLC	\$20,000,000
03/12/2007	68401TAD0	Option One Mortgage Loan Trust 2007-2	OOMLT 2007-2	3A2		Option One Mortgage Corporation	Banc of America Securities; Greenwich Capital Markets, Inc.; H & R Block Financial Advisors Inc.; HSBC Securities (USA) Inc.	Option One Mortgage Acceptance Corporation	\$30,000,000
04/12/2007	68402BAC0	Option One Mortgage Loan Trust 2007-3	OOMLT 2007-3	2A2		Option One Mortgage Corporation	Banc of America Securities; Greenwich Capital Markets, Inc.; H & R Block Financial Advisors Inc.;	Option One Mortgage Acceptance Corporation	\$25,000,000

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