



neither party resides within the State and Plaintiff designates New York County as the place of trial.

NOTICE:

This is an action for breach of contract, specific performance, declaratory relief and indemnification arising from Defendants' breaches of representations and warranties in respect of certain mortgage loans and Defendants' failure to repurchase such mortgage loans as required under the applicable agreements.

On or about September 27, 2006, the Federal Home Loan Mortgage Corporation ("Freddie Mac") purchased certificates issued by the Morgan Stanley ABS Capital I Inc. Trust, Series 2006-HE6 ("MSAC 2006-HE6" or the "Trust"), which are backed by a pool of residential mortgage loans. Defendant Decision One Mortgage Company, LLC ("Decision One") made contractual representations and warranties concerning the mortgage loans in the pool (the "R&Ws"), including, among other things, R&Ws that: (i) each mortgage loan complied with all local, state and federal laws; (ii) no mortgage loan has an LTV greater than 100%; (iii) the mortgage loans were written in accordance with Decision One's underwriting guidelines; (iv) there was no adverse selection of the mortgage loans conveyed to the Trust; (v) the mortgage loan files contain an independent appraisal of the mortgaged property signed prior to the approval of the loan; (vi) no document furnished in connection with the transaction contains any untrue statement of fact or makes an omission that would make the statements therein misleading; and (vii) no mortgage loan is a "high cost" or "covered" loan, as applicable. On April 16, 2012, Decision One was administratively dissolved by the North Carolina Secretary of State. On information and belief, HSBC Finance Corporation ("HSBC") is the successor-in-

