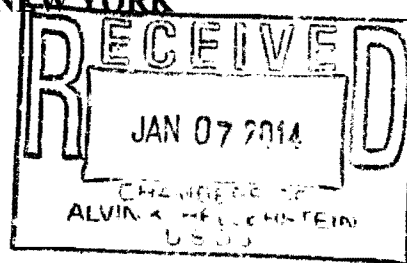


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK



FEDERAL HOUSING FINANCE AGENCY, AS
CONSERVATOR FOR THE FEDERAL HOME
LOAN MORTGAGE CORPORATION, on behalf
of the Trustee of the Securitized Asset Backed
Receivables LLC Trust 2006-WM4 (SABR 2006-
WM4),

Plaintiff,

v.

WMC MORTGAGE, LLC f/k/a WMC
MORTGAGE CORP.

Defendant.

DEUTSCHE BANK NATIONAL TRUST
COMPANY, solely in its capacity as Trustee of
the Securitized Asset Backed Receivables LLC
Trust 2006-WM4 (SABR 2006-WM4),

Plaintiff,

v.

WMC MORTGAGE, LLC f/k/a WMC
MORTGAGE CORP.

Defendant.

Case No. 1:13-cv-0584-(AKH)

ECF CASE

*I've read the Appellate Division's
decision in ACE II and it does
not change my views that
the contract was breached not
at the time of closing but
at the time of failure to
cure. Therefore the motion
to reconsider is denied.*

Alvin K. Hellerstein 1/7/14

WMC MORTGAGE, LLC'S NOTICE OF MOTION
FOR RECONSIDERATION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and all
papers and proceedings heretofore had herein, the undersigned attorneys for Defendant WMC
Mortgage, LLC shall, pursuant to Local Rule 6.3, move this Court, before the Honorable Alvin
K. Hellerstein, United States District Judge for the Southern District of New York, at the United

States Courthouse located at 500 Pearl Street, Courtroom 14D, New York, New York 10007, at the time set by the Court, for reconsideration of the Court's order denying WMC's motion to dismiss the Verified Complaint of Intervenor-Plaintiff Deutsche Bank National Trust Company pursuant to FRCP 12(b)(6), entered on December 17, 2013 (ECF No. 53), and for such other and further relief as the Court deems appropriate.

Dated: December 31, 2013

Respectfully Submitted,

/s/ Stephen L. Ascher

Stephen L. Ascher
JENNER & BLOCK LLP
919 Third Avenue
New York, NY 10022-3908
Phone: 212 891-1600
Fax 212 891-1699
Email: abarkow@jenner.com

Paul M. Smith
Matthew S. Hellman (*admitted pro hac vice*)
JENNER & BLOCK LLP
1099 New York Ave NW
Washington, DC 20001-4412
Phone: 202 639-6000
Fax: 202 639-6066
Email: psmith@jenner.com
mhellman@jenner.com

Barbara S. Steiner (*admitted pro hac vice*)
Megan B. Poetzel (*admitted pro hac vice*)
JENNER & BLOCK LLP
353 N. Clark St.
Chicago, IL 60654
Phone: 312 222-9350
Fax: 312 527-0484
Email: bsteiner@jenner.com
mpoetzel@jenner.com

Attorneys for Defendant WMC Mortgage, LLC