

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

IKB INTERNATIONAL S.A. IN LIQUIDATION and  
IKB DEUTSCHE INDUSTRIEBANK AG

Plaintiffs,

v.

BANK OF AMERICA CORPORATION; BANK OF  
AMERICA, N.A.; NB HOLDINGS CORPORATION;  
COUNTRYWIDE FINANCIAL CORPORATION;  
COUNTRYWIDE HOME LOANS, INC.;  
COUNTRYWIDE SECURITIES CORPORATION;  
CWABS, INC.; and CWMBS, INC.,

Defendants.

Index #:

**Summons with Notice**

**TO THE ABOVE-NAMED DEFENDANTS:**

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED and required to serve upon Plaintiffs' 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.

Plaintiffs designate 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 and/or a declaratory judgment arising from Plaintiffs' investment in residential mortgage-backed securities (the "Securities") which were securitized by Defendants and sold to Plaintiffs by Defendants. Plaintiffs purchased \$200,319,000 in Securities in the offerings listed on Exhibit A attached hereto (the "Offerings"). The Securities were sold by Plaintiffs at a loss.

Defendants were actively involved in each step of the securitization and sale of the Securities to Plaintiffs. 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 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 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 Plaintiffs 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 Plaintiffs by means of Offering Materials which contained knowing material misrepresentations and omissions.

Plaintiffs 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 Plaintiffs' damages, which include loss of market value on the Securities.

Plaintiffs' causes of action against Bank of America Corporation, NB Holdings Corporation, Bank of America, N.A. and Countrywide Financial Corporation 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. 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.

Upon your failure to appear, judgment will be taken against you by default for money damages in an amount of at least \$200,319,000, and interest thereon, together with punitive damages of \$200,319,000, rescissory damages, legal fees, and the costs of this action.

Dated: New York, New York  
May 14, 2012

**LABATON SUCHAROW LLP**

By: /s/ Joel H. Bernstein  
Joel H. Bernstein

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New York, NY 10005  
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*Attorneys for IKB International S.A. in  
Liquidation and IKB Deutsche  
Industriebank AG*

Exhibit A

Trade Date	Start Date	CUSIP	Issuing Entity	Short Name	Tranche	Sponsor	Underwriter/ Counterparty	Depositor	Original Position
12/01/2005	11/30/2005	126670KB3	CWABS Trust 2005-HYB9	CWHL 05- HYB9	M1		Countrywide Securities Corporation	CWABS, Inc.	\$6,279,000
01/12/2006	01/31/2006	126694WS3	CHL Mortgage Pass-Through Trust 2006- HYB1	CWHL 06- HYB1	M	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWMBS, Inc.	\$8,700,000
04/24/2007	03/31/2004	1266715M4	CWABS Asset- Backed Certificates Trust 2004-4	CWL 04-4	M3	Countrywide Home Loans, Inc.		CWABS, Inc.	\$13,000,000
11/04/2005	11/21/2005	126670HG6	CWABS Asset- Backed Certificates Trust 2005-13	CWL 05-13	3AV3	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$15,000,000
02/24/2006	11/21/2005	126670GU6	CWABS Asset- Backed Certificates Trust 2005-13	CWL 05-13	MF1	Countrywide Home Loans, Inc.		CWABS, Inc.	\$3,800,000
11/30/2005	12/21/2005	126670LM8	CWABS Asset- Backed Certificates Trust 2005-14	CWL 05-14	3A2	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$20,000,000
12/01/2005	12/21/2005	126670LV8	CWABS Asset- Backed Certificates Trust 2005-14	CWL 05-14	M7	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$3,000,000
12/06/2005	12/30/2005	126670MF2	CWABS Asset- Backed Certificates Trust 2005-15	CWL 05-15	2AV2	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$25,000,000

<b>Trade Date</b>	<b>Start Date</b>	<b>CUSIP</b>	<b>Issuing Entity</b>	<b>Short Name</b>	<b>Tranche</b>	<b>Sponsor</b>	<b>Underwriter/ Counterparty</b>	<b>Depositor</b>	<b>Original Position</b>
11/21/2005	11/29/2005	126670KS6	CWABS Asset-Backed Certificates Trust 2005-AB4	CWL 05-AB4	M4	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$4,200,000
12/06/2005	12/28/2005	126670NL8	CWABS Asset-Backed Certificates Trust 2005-BC5	CWL 05-BC5	M7	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$4,325,000
11/16/2005	12/21/2005	126670JD1	CWABS Asset-Backed Certificates Trust 2005-IM3	CWL 05-IM3	A3	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$5,000,000
01/27/2006	02/10/2006	126670TJ7	CWABS Asset-Backed Certificates Trust 2006-1	CWL 06-1	MF1	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$4,000,000
06/23/2006	06/30/2006	12666PAK0	CWABS Asset-Backed Certificates Trust 2006-10	CWL 06-10	MF4	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$2,550,000
06/23/2006	06/30/2006	12666PAL8	CWABS Asset-Backed Certificates Trust 2006-10	CWL 06-10	MF5	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$2,465,000
07/24/2006	07/28/2006	23242EAP4	CWABS Asset-Backed Certificates Trust 2006-13	CWL 06-13	MV4	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$3,000,000
07/24/2006	07/28/2006	23242EAQ2	CWABS Asset-Backed Certificates Trust 2006-13	CWL 06-13	MV5	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$2,000,000
07/24/2006	07/28/2006	23242EAS8	CWABS Asset-Backed Certificates Trust 2006-13	CWL 06-13	MV7	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$4,000,000

Trade Date	Start Date	CUSIP	Issuing Entity	Short Name	Tranche	Sponsor	Underwriter/ Counterparty	Depositor	Original Position
09/19/2006	09/28/2006	23243WAH1	CWABS Asset-Backed Certificates Trust 2006-18	CWL 06-18	M4	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$6,500,000
09/19/2006	09/28/2006	23243WAJ7	CWABS Asset-Backed Certificates Trust 2006-18	CWL 06-18	M5	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$6,000,000
09/27/2006	09/29/2006	12667CAH5	CWABS Asset-Backed Certificates Trust 2006-19	CWL 06-19	M4	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$4,500,000
09/27/2006	09/29/2006	12667CAJ1	CWABS Asset-Backed Certificates Trust 2006-19	CWL 06-19	M5	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$4,500,000
02/16/2006	02/27/2006	126670VY1	CWABS Asset-Backed Certificates Trust 2006-3	CWL 06-3	2A2	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$5,000,000
03/08/2006	03/28/2006	126670YG7	CWABS Asset-Backed Certificates Trust 2006-5	CWL 06-5	2A2	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$5,000,000
06/01/2006	06/27/2006	12666MAB7	CWABS Asset-Backed Certificates Trust 2006-SPS1	CWL 06-SPS1	M1	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$5,000,000
06/01/2006	06/27/2006	12666MAC5	CWABS Asset-Backed Certificates Trust 2006-SPS1	CWL 06-SPS1	M2	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$4,500,000
08/23/2006	08/29/2006	12667BAB0	CWABS Asset-Backed Certificates Trust 2006-SPS2	CWL 06-SPS2	M1	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$10,000,000

<b>Trade Date</b>	<b>Start Date</b>	<b>CUSIP</b>	<b>Issuing Entity</b>	<b>Short Name</b>	<b>Tranche</b>	<b>Sponsor</b>	<b>Underwriter/ Counterparty</b>	<b>Depositor</b>	<b>Original Position</b>
03/20/2007	03/29/2007	12668WAK3	CWABS Asset-Backed Certificates Trust 2007-4	CWL 07-4	M6	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$9,000,000
03/20/2007	03/29/2007	12668WAM9	CWABS Asset-Backed Certificates Trust 2007-4	CWL 07-4	M8	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$4,000,000
07/22/2005	08/30/2005	1266734B5	CWABS Asset-Backed Certificates Trust 2005-IM1	CWL 05-IM1	M1	Countrywide Home Loans, Inc.	Countrywide Securities Corporation	CWABS, Inc.	\$10,000,000
									<b>\$200,319,000</b>