

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MORTGAGE RESOLUTION SERVICING,	:
LLC, 1ST FIDELITY LOAN SERVICING,	:
LLC, and S & A CAPITAL PARTNERS,	:
INC.,	:
	:
<i>Plaintiffs,</i>	:
	:
- v. -	:
	:
JPMORGAN CHASE BANK, N.A., CHASE	:
HOME FINANCE, LLC, and JPMORGAN	:
CHASE & CO.,	:
	:
<i>Defendants.</i>	:
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No. 15-CV-00293 (LTS)(JCF)

**DECLARATION OF
MICHAEL M. MAYA**

I, MICHAEL M. MAYA, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an attorney at the law firm of Covington & Burling LLP, counsel to Defendants JPMorgan Chase Bank N.A. and JPMorgan Chase & Co. (collectively, “Chase”). I am a member in good standing of the bar of the District of Columbia and am admitted *pro hac vice* in the above-captioned matter. I submit this declaration in support of Defendants’ Motion to File Under Seal. I have personal knowledge of the matters set forth herein.
2. As explained in the parties’ Preliminary Pre-Trial Statement, filed on April 17, 2015 (Dkt. 29-1), Chase intends to move to transfer venue of this action to the United States District Court for the District of Columbia, where it may be coordinated with a related action, *United States ex rel. Schneider v. JPMorgan Chase Bank, N.A.* No. 1:14-cv-01047-RMC (the “Schneider False Claims Act Action” or “Schneider FCA Action”).
3. On November 17, 2014, Relator Laurence Schneider filed a First Amended Complaint in the Schneider FCA Action (the “FCA Complaint”).
4. The FCA Complaint was filed under seal and remains under seal.

5. Chase has been authorized to submit the FCA Complaint to this Court in connection with Chase's motion to transfer, provided that the FCA Complaint is filed under seal in this Court.

6. For the Court's convenience, a form of order granting the relief sought herein is annexed hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 19, 2015 in Washington, DC.



Michael M. Maya

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MORTGAGE RESOLUTION SERVICING,	:	
LLC, 1ST FIDELITY LOAN SERVICING,	:	
LLC, and S & A CAPITAL PARTNERS,	:	No. 15-CV-00293 (LTS)(JCF)
INC.,	:	
	:	
<i>Plaintiffs,</i>	:	
	:	
- v. -	:	[PROPOSED] SEALING ORDER
	:	
JPMORGAN CHASE BANK, N.A., CHASE	:	
HOME FINANCE, LLC, and JPMORGAN	:	
CHASE & CO.,	:	
	:	
	:	
<i>Defendants.</i>	:	
-----	X	

UPON THE APPLICATION OF movants, Defendants JPMorgan Chase Bank, N.A. and JPMorgan Chase & Co., for an order sealing:

- First Amended Complaint, filed under seal on November 17, 2014, in the United States District Court for the District of Columbia, in Case No. 1:14-cv-01047-RMC, *United States ex rel. Schneider v. JPMorgan Chase Bank, N.A., et al.*; and
- An unredacted version of Defendants' Memorandum of Law in Support of Their Motion to Transfer Venue to the United States District Court for the District of Columbia,

and good cause to do so having been found, it is hereby:

ORDERED that the following documents be filed under seal:

- First Amended Complaint, filed under seal on November 17, 2014, in the United States District Court for the District of Columbia, in Case No. 1:14-cv-01047-RMC, *United States ex rel. Schneider v. JPMorgan Chase Bank, N.A., et al.*, and
- An unredacted version of Defendants' Memorandum of Law in Support of Their Motion to Transfer Venue to the United States District Court for the District of Columbia; and

IT IS FURTHER ORDERED that the aforementioned documents shall be filed under seal and the public shall not have access to them; and

IT IS FURTHER ORDERED that the sealed records that have been filed with the clerk shall be removed by the party submitting them (1) within ninety (90) days after a final decision is rendered if no appeal is taken, or (2) if an appeal is taken, within thirty (30) days after final disposition of the appeal. Parties failing to comply with this Order shall be notified by the clerk that, should they fail to remove the sealed records within thirty (30) days, the clerk may dispose of them.

IT IS SO ORDERED, this ___ day of May, 2015.

U.S.D.J.