

Exhibit D

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, <i>et al.</i> ,)	
)	Civil Action No. 1:12-cv-00361-RMC
Plaintiffs,)	
and)	
)	
RAYMOND WRAY, on behalf of himself)	
and all those similarly situated)	
)	
Intervenor)	
)	
v.)	
)	
BANK OF AMERICA CORP., <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**INTERVENOR RAYMOND WRAY’S MOTION
TO ALTER OR AMEND THE CONSENT JUDGMENT**

Intervenor, Raymond Wray, a retired staff sergeant in the United States Army, on behalf of himself and all similarly-situated men and women serving in the United States Armed Forces, hereby moves pursuant to Rule 60(b) of the Federal Rules of Civil Procedure to alter or amend the Court’s Consent Judgment (Dkt. No. 12) as to Defendants Citigroup Inc., Citibank, N.A., and CitiMortgage, Inc. (collectively, “Citi”) so as to (1) strike § II(b) of Exhibit H from the Consent Judgment; (2) prohibit Citi from soliciting the release of all SCRA claims from members of the proposed class of United States service men and women in the case captioned Wray v. CitiMortgage, Inc., Case No. 3:12-3628-CMC (the “Wray action”), pending before the United States District Court for the District of South Carolina, (3) and void any previously-obtained release of SCRA claims from having any effect.

The factual and legal reasons for granting this motion are contained in Intervenor's previously-filed memorandum of law in support of his motion to intervene, petition for a temporary restraining order, and motion for a preliminary injunction.

Respectfully submitted by:

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