

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:
	:
LEHMAN BROTHERS INC.,	:
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	:
	:
Debtor.	:
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Case No. 08-01420 (JMP) SIPA

**DECLARATION OF PETER FELDMAN IN SUPPORT OF MEMORANDUM OF LAW OF
(I) THE FDIC, AS RECEIVER OF WESTERNBANK PUERTO RICO AND (II) CARVAL
INVESTORS UK LIMITED, AS MANAGER OF ASSIGNEE OF DORAL BANK AND
DORAL FINANCIAL CORPORATION, IN OPPOSITION TO TRUSTEE’S MOTION FOR
AN ORDER CONFIRMING THE TRUSTEE’S DETERMINATION OF CLAIMS
RELATING TO REPURCHASE AGREEMENTS BETWEEN LBI AND WESTERNBANK
PUERTO RICO AND DORAL BANK AND DORAL FINANCIAL CORPORATION**

Peter Feldman, under penalty of perjury, declares as follows:

1. I am an attorney duly admitted to practice in this Court and I am a member of the firm of Otterbourg, Steindler, Houston & Rosen, P.C., attorneys for the Federal Deposit Insurance Corporation (the “FDIC”), as receiver of Westernbank Puerto Rico (“Westernbank”). I submit this declaration in support of the Memorandum of Law of (I) the FDIC, as Receiver of Westernbank Puerto Rico and (II) Carval Investors UK Limited (“CarVal”), as Manager of Assignee of Doral Bank and Doral Financial Corporation (collectively “Doral”), in Opposition to Trustee’s Motion for an Order Confirming the Trustee’s Determination of Claims Relating to Repurchase Agreements Between LBI and Westernbank Puerto Rico and Doral Bank and Doral Financial Corporation (the “Opposition Memorandum”).¹

2. Attached as Exhibits 1 through 39 are copies of the following documents:

¹ Capitalized terms utilized but not otherwise defined herein shall have the meanings ascribed to them in the Opposition Memorandum.

EXHIBIT	DOCUMENT
1	Deposition Transcript of Leonard J. Legotte, dated May 31, 2012
2	Deposition Transcript of Daniel T. McIsaac, dated June 4, 2012
3	Deposition Transcript of William Burke, dated June 6, 2012
4	Deposition Transcript of Joseph De Stephan, dated June 26, 2012
5	Deposition Transcript of Oscar Caiazza, dated June 11, 2012
6	Trustee's Response to FDIC's Requests for Admission
7	Trustee's Response to CarVal's Requests for Admission
8	Repo Manual, Updated November 8, 2005
9	Excerpts from Consolidated Statement of Financial Condition, Lehman Brothers Inc. & Subsidiaries as of May 31, 2008
10	FDIC Press Release, dated April 30, 2010
11	Form 10-K filed by Doral Financial Corp. with the SEC on March 20, 2009, for the period ending December 31, 2008
12	Email dated March 1, 2004
13	Email dated January 16, 2002
14	Form 10-K filed by W Holding Company, Inc. with the SEC on October 28, 2009, for the period ending December 31, 2008
15	Global Account Detail - Doral
16	Global Account Detail - Westernbank
17	Customer Account Form - Westernbank
18	Customer Account Forms - Doral
19	Westernbank Client Statements
20	Doral Client Statements

EXHIBIT	DOCUMENT
21	Letter Agreements executed by LBI and Doral
22	LehmanLive Records - Doral
23	LehmanLive Records - Westernbank
24	Doral Stock Records
25	Westernbank Stock Records
26	Westernbank R&D Records
27	Doral R&D Records
28	Westernbank CAMEO Report
29	Doral CAMEO Report
30	Doral Infinity Report
31	Westernbank Infinity Report
32	Email dated June 9, 2003
33	Email dated June 9, 2004
34	Email dated January 23, 2004
35	Email dated May 4, 2004
36	Customer Claim Form filed by Westernbank Puerto Rico (Claim No. 900007799), dated June 1, 2009
37	Customer Claim Form filed by Westernbank International (Claim No. 900007798), dated June 1, 2009
38	Transcript of Dan McIsaac dated August 18, 2010 in connection with Underwriters Customer Claim Litigation
39	<i>Official Comm. Of Unsecured Creditors v. Doe (In re Refco, Inc.)</i> , Case No. 05-60006, Transcript of Hearing (Bankr. S.D.N.Y Mar. 14, 2006)

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

Executed on July 20, 2012

/s/ Peter Feldman

Peter Feldman

EXHIBITS 1 TO 39 FILED UNDER SEAL