

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

In re: Bank of America Home Affordable
Modification Program (HAMP) Contract
Litigation

No. 1:10-md-02193-RWZ

DECLARATION OF MARK E. MCELROY
IN SUPPORT OF DEFENDANT'S MOTION FOR A PROTECTIVE
ORDER REGARDING CONFIDENTIAL INFORMATION

FILED UNDER SEAL

I, Mark E. McElroy, state as follows:

1. I am employed by Bank of America, N.A. ("BANA"), successor by merger to BAC Home Loans Servicing L.P., as the Sourcing Executive supporting Legacy Asset Services. I have been employed by BANA since 2008 and was previously employed by Countrywide Home Loans since 1995. In this role, I am responsible for, among other things, establishment of the contractual relationship between BANA and third party vendors, including the confidential contractual terms therein. As part of my job, I have become familiar with BANA's relationship with its third-party vendors, including Urban Lending Solutions ("Urban"), formerly known as Urban Settlement Services, LLC.

2. This Declaration is based upon my personal knowledge, and/or review of business records and information kept in the regular course of BANA's business and available to me in the course of my duties at BANA, as well as information provided to me by BANA's employees.

3. [REDACTED]

[Remainder of this page intentionally left blank]

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct this 14th day of August, 2012.



Mark E. McElroy

CERTIFICATE OF SERVICE

I, James W. McGarry, hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies shall be served by first class mail postage prepaid on all counsel who are not served through the CM/ECF system on August 24, 2012.

/s/ James W. McGarry