

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

DECLARATION OF MARK TYLER KNIGHTS

I, Mark Tyler Knights, state as follows:

1. I am an attorney with the law firm of Goodwin Procter LLP, Exchange Place, Boston, Massachusetts 02109. I am a member in good standing of the Bar of the Commonwealth of Massachusetts, and am counsel of record for Defendants Bank of America, N.A. and BAC Home Loans Servicing, LP (collectively, "Bank of America") in this matter.

2. I make this declaration in support of Bank of America's Motion to Dismiss Consolidated Class Action Complaint.

3. Attached hereto as Exhibit A is a true and correct copy of a December 4, 2009 letter from Sandra Braunstein, Director of the Federal Reserve Board's Division of Consumer and Community Affairs. This letter was retrieved from the Federal Reserve's website (<http://www.federalreserve.gov/boarddocs/caletters/2009/0913/caltr0913.htm>) on February 18, 2011.

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct this 21st day of February, 2011.

/s/ Mark Tyler Knights
Mark Tyler Knights