UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

CONSUMER FINANCIAL PROTECTION BUREAU, Plaintiff, v. THE NATIONAL COLLEGIATE MASTER STUDENT LOAN TRUST, *et al.*, Defendants.	C.A. No. 17-CV-01323 (MN)

STIPULATION AND [PROPOSED] ORDER UNSEALING SEALED FILINGS

WHEREAS the Objecting Noteholders[1] filed D.I. 164 and 164.1under seal because they contained information produced in discovery by the Responding Non-Parties[2] designated as confidential pursuant to the Stipulated Protective Order (D.I. 131) (the "Designated Information"); and

WHEREAS the Responding Non-Parties have consented to the Designated Information being unsealed;

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[1] The Objecting Noteholders are Waterfall Eden Master Fund, Ltd., Waterfall Delta Offshore Master Fund, LP, Waterfall Sandstone Fund, LP., Baldr Sherwood Fund, Inc., One William Street Capital Master Fund, Ltd., OWS ABS Master Fund II, L.P., OWS COF I Master, L.P., OWS Credit Opportunity I, LLC, OWS Global Fixed Income Fund (USD-Hedged), Ltd., LibreMax Master Fund, Ltd., LibreMax Value Master Fund, Ltd., LibreMax MSW Fund, Ltd., AG Mortgage Value Partners Master Fund, L.P., AG TCDRS, L.P., AG Pisgah, L.P., AG Super RMBS LLC, and AG Opportunistic Whole Loan Select, L.P.

[2] The Responding Non-Parties include VCG Securities, VCG Owners Trust, NC Owners, LLC, NC Residuals Owners Trust, Pathmark Associates LLC, and CeCe & Co. Ltd. LLC.

NOW, THEREFORE, it is stipulated and agreed, by and among the Objecting Noteholders and the Responding Non-Parties through their undersigned counsel, subject to the approval of the Court, that D.I. 164, and 164.1may be unsealed.

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Attorneys for the Objecting Noteholders

Dated: April 26, 2019

IT IS SO ORDERED this ___ day of _____, 2019.

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The Honorable Maryellen Noreika
United States District Judge