**IN THE UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF DELAWARE**

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| CONSUMER FINANCIAL PROTECTION BUREAU<br><br>Plaintiff,<br><br>v.<br><br>THE NATIONAL COLLEGIATE MASTER STUDENT LOAN TRUST, et al.<br><br>Defendants. | C.A. No. 17-cv-01323 (MN) |

**DECLARATION OF GABRIEL HOPKINS FOR PLAINTIFF CONSUMER FINANCIAL PROTECTION BUREAU IN SUPPORT OF PLAINTIFF'S REPLY IN SUPPORT OF ITS MOTION TO APPROVE THE PROPOSED CONSENT JUDGMENT**

I, GABRIEL HOPKINS, hereby declare and state as follows:

1. I am lead counsel for Plaintiff Consumer Financial Protection Bureau in the above-captioned matter. I submit this Declaration in support of Plaintiff's Reply in Support of its Motion to Approve the Proposed Consent Judgment.

2. Attached as **Exhibit A** is a true and correct copy of an email exchange between Ed Keefe, of the Bureau, and Dorie Costello, of Wilmington Trust Company, dated May 9, 2016 to May 13, 2016.

3. Attached as **Exhibit B** is a true and correct copy of CPFB Bulletin No. 2001-04, Notice & Opportunity to Respond & Advise (NORA) (2011), attached to the May 9, 2016 email from Ed Keefe to Dorrie Costello reproduced in Exhibit A.

4. Attached as **Exhibit C** is a true and correct copy of excerpts of the deposition testimony of Dorie Costello, sitting as 30(b)(6) designee for Wilmington Trust Company, dated January 10, 2020.

5. Attached as **Exhibit D** is a true and correct copy of a document entitled "Issuer Order" sent by Wilmington Trust Company to GSS Data Services, Inc, dated August 8, 2016.

6. Attached as **Exhibit E** are true and correct copies of statements of payments from Defendant Trusts' accounts dated September 26, 2016.

7. Attached as **Exhibit F** are true and correct copies of statements of payments from Defendant Trusts' accounts dated November 26, 2016.

8. Attached as **Exhibit G** is a true and correct copy of an email from Lance Gotthoffer of Chaitman, LLP, to Tristan Fleming, of GSS Data Services, Inc., dated June 14, 2016

9. Attached as **Exhibit H** is a true and correct copy of excerpts of the deposition testimony of James Kosch, dated January 8, 2020.

10. Attached as **Exhibit I** is a true and correct copy of excerpts of the deposition testimony of Lance Gotthoffer, dated February 12, 2020.

11. Attached as **Exhibit J** is a true and correct copy of a July 19, 2016 invoice submitted by McCarter & English, LLP, to Chaitman, LLP, for services rendered to Defendant Trusts.

12. Attached as **Exhibit K** is a true and correct copy of excerpts of the deposition testimony of Donald Uderitz, dated February 6, 2020.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 30, 2020

Respectfully submitted,

*Attorneys for Plaintiff*
Consumer Financial Protection Bureau

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/s/ Gabriel Hopkins

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CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2020, I electronically filed the Redacted Declaration of Gabriel Hopkins in Support of Plaintiff's Reply in Support of its Motion to Approve the Proposed Consent Judgment with the Clerk of Court using CM/ECF which will send notification of such filing(s) to all parties to this matter registered for CM/ECF.

I hereby further certify that on May 7, 2020, I sent a copy of the Redacted Declaration of Gabriel Hopkins in Support of Plaintiff's Reply in Support of its Motion to Approve the Proposed Consent Judgment by email to Intervenor Wilmington Trust Company which is agent authorized to accept service on behalf of the Defendants.

Dated: May 7, 2020

/s/ Gabriel Hopkins
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*Attorney for Plaintiff Consumer Financial Protection Bureau*