

JEFFREY S. SCHULTZ, CFA Vice President/Trust Investment Officer

July 1, 2011

Hon. Mary F. Walrath United States Bankruptcy Court District of Delaware 824 Market Street, 3<sup>rd</sup> Floor Wilmington, DE 19801

RE: Motion to Appoint a Dime LTW Committee

Dear Judge Walrath:

American National Bank has several clients who hold Dime LTWs. It is my understanding that a motion is being brought forward by a small group of concerned holders of the Dime LTWs to have the Trustee appoint a Dime LTW Committee. American National Bank strongly supports this motion. Our concern is very simple. We want to have our clients' interests adequately represented in this court.

This court created a class for the LTW holders, similar to equity holders and unsecured creditors who each have a class. The court created an Equity Committee (EC) and an Unsecured Creditor's Committee (UCC). This motion asks that the court create the Dime LTW Holders Committee (LTWC).

The EC and the UCC have not only refused to represent the LTW holders, they have spent an enormous amount of money opposing us. The debtor opposes us. Everyone treats us as the red haired step child.

As the court is well aware, the LTW holders have individually had to fund their case. Broadbill has now dropped out and contributions had to be sought.

Imagine if you will the UCC or EC not having a source of funds and having to pass the hat to raise funds to protect their interests. They have a significant advantage over us and we feel we have a class similar to theirs and we should be funded in a manner similar to them. All we seek is equality with the EC and the UCC.

Funding the LTWC will insure that the class will be able to make a unified and orderly presentation to the court. We feel the last thing the court would want is to have numerous pro se holders coming forward thinking with Broadbill out that they are no longer going to be represented. There is also a distinct possibility that other LTW holders would want to bring in their own counsel, rather than put

money in the hat being passed around. If the current effort was no longer able to be financed I would almost guarantee you that American National and many others would bring in their separate counsel. This of course would be chaotic.

The debtor WMI, the EC and the UCC are all represented by extremely capable and expensive law firms. They are all funded by the estate. They are formidable foes. To date American National is very pleased with our representation and would certainly support having the LTWC continue with our same team that is currently representing us.

I realize the Trustee recently turned down a request to form a LTWC. However I feel the request was not explained in enough detail and am now asking for the court to appoint a LTWC based on the complete information now being submitted.

Sincerely,

Jeffrey Schultz, CFA

Vice President and Trust Investment Officer

JSS/jbh