UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION – DETROIT

Chapter 9
-
Case No. 13-53846
Hon. Steven W. Rhodes

NATIONAL PUBLIC FINANCE GUARANTEE CORPORATION'S JOINDER IN THE MOTION OF SYNCORA GUARANTEE INC. AND SYNCORA CAPITAL ASSURANCE INC. FOR AUTHORITY TO ISSUE DOCUMENT AND DEPOSITION SUBPOENAS TO THE DEBTOR, THE EMERGENCY MANAGER, AND CERTAIN OF THE DEBTOR'S ADVISORS PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004

National Public Finance Guarantee Corporation ("National"), by and through its undersigned counsel, hereby submits this joinder (the "Joinder") in the Motion of Syncora Guarantee Inc. and Syncora Capital Assurance Inc. for Authority to Issue Document and Deposition Subpoenas to the Debtor, the Emergency Manager, and Certain of the Debtor's Advisors Pursuant to Federal Rule of Bankruptcy Procedure 2004 [Docket No. 1342] (the "2004 Motion"). In support of this Joinder, National respectfully submits as follows:

1. National is a municipal bond insurer and is a creditor and/or party in interest in this chapter 9 proceeding. In particular, National has insured several bonds issued by the City of Detroit (the "City"), including unlimited tax general

obligation bonds, water supply system bonds, and sewage disposal system bonds. National has also insured bonds issued by, or transferred to, various discrete City or State authorities that are entities separate from the City. In aggregate, National has provided insurance for approximately \$2.4 billion of the City's municipal bonds and bonds issued by City authorities.

2. National hereby joins the 2004 Motion and adopts and incorporates the arguments in the 2004 Motion in their entirety as if fully set forth in this Joinder.

WHEREFORE, National respectfully requests that the Court grant the relief requested in the 2004 Motion and grant such other and further relief as is just and proper.

Dated: November 6, 2013 Respectfully submitted,

/s/ Eric D. Novetsky

JAFFE, RAITT, HEUER & WEISS, P.C.

Eric D. Novetsky (P71953) Louis P. Rochkind (P24121)

2777 Franklin Road, Suite 2500

Southfield, MI 48034 Tel: (248) 351-3000 Fax: (248) 351-3082

Email: enovetsky@jaffelaw.com

and

SIDLEY AUSTIN LLP

Jeffrey E. Bjork 555 West Fifth Street, Ste. 4000

Los Angeles, CA 90013

Tel: (213) 896-6000 Fax: (213) 896-6600

Email: jbjork@sidley.com

SIDLEY AUSTIN LLP

Guy S. Neal

1501 K Street, N.W.

Washington, DC 20005

Tel: (202) 736-8000

Fax: (202) 736-8711

Email: gneal@sidley.com

Attorneys for National Public Finance Guarantee Corporation