

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

| | | |
|----------------------------|---|-----------------------|
| In re |) |) |
| |) | Chapter 9 |
| CITY OF DETROIT, MICHIGAN, |) |) |
| |) | Case No. 13-53846 |
| Debtor. |) |) |
| |) | Hon. Steven W. Rhodes |
| |) |) |

**SYNCORA GUARANTEE INC. AND SYNCORA CAPITAL ASSURANCE
INC. DISCLOSURE OF WITNESSES AND DOCUMENTS IN ADVANCE
OF THE DECEMBER 17-19, 2013 HEARINGS**

On November 27, 2013 this Court held a hearing regarding the the City of Detroit (the “City’s”) *Motion for Entry of an Order Establishing Pre-Trial and Trial Procedures and Setting Additional Hearing Dates* dated November 22, 2013 [Docket No. 1788] (the “Trial Procedure Motion”). During the hearing related to the Trial Procedure Motion, certain objectors to the City’s Trial Procedures Motion agreed to provide a list of will-call and may-call witnesses by December 2, 2013. Syncora Guarantee Inc. and Syncora Capital Assurance Inc. (collectively, “Syncora”) file this disclosure of witnesses in connection with the hearing on the City’s Assumption Motion [Docket Nos. #17, #157] and the City’s Motion to Approve Post-Petition Financing [Docket No. #1520] set by this Court for December 17-19, 2013. Syncora may call the following witnesses:

Witnesses

1. Alexandra Schwarzman

2. Scott Davido

Syncora reserves the right, consistent with the parties' agreement of November 27, 2013, to designate rebuttal witnesses by December 12, 2013.

Dated: December 2, 2013

Respectfully submitted,

KIRKLAND & ELLIS LLP

By: /s/ Stephen C. Hackney

James H.M. Sprayregen, P.C.

Ryan Blaine Bennett

Stephen C. Hackney

KIRKLAND & ELLIS LLP

300 North LaSalle

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

- and -

Stephen M. Gross

David A. Agay

Joshua Gadharf

MCDONALD HOPKINS PLC

39533 Woodward Avenue

Bloomfield Hills, MI 48304

Telephone: (248) 646-5070

Facsimile: (248) 646-5075

*Attorneys for Syncora Guarantee Inc. and
Syncora Capital Assurance Inc.*