

**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
	)

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**NOTICE OF VIDEOTAPED DEPOSITION OF GAURAV MALHOTRA**

To: The City of Detroit, Michigan and Parties on the attached **Exhibit 1**.

**PLEASE TAKE NOTICE** that, pursuant to Federal Rules of Civil Procedure 26 and 30, made applicable to this proceeding by Federal Rules of Bankruptcy Procedure 7026 and 7030, and the Syncora Guarantee Inc. and Syncora Capital Assurance Inc. and all of the parties set forth in **Exhibit 1**, attached hereto, by and through their attorneys of record, will take the deposition upon oral examination of **Gaurav Malhotra** at the offices of Miller Canfield, 150 West Jefferson Suite 2500, Detroit, Michigan 48226 on **Monday, December 11, 2013**, or at such other date or place to which the parties mutually agree. The deposition will begin at **9:30 a.m.**, and continue until completed. Mr. Malhotra's deposition will be taken before a court reporter or other person authorized by law to administer oaths and provide an official record of the deposition. Mr. Malhotra's deposition will be recorded by stenograph and videotaped for the purpose of discovery, for use in the above-titled action, and for any other purpose

permitted under the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure.

Dated: December 6, 2013

Respectfully submitted,

**KIRKLAND & ELLIS LLP**

By: /s/ Stephen C. Hackney

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**EXHIBIT 1**

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<p><i>Michigan Council 25 of the American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO and Sub-Chapter 98, City of Detroit Retirees</i></p>	<p>LOWENSTEIN SANDLER LLP  Sharon L. Levine, Esq.  John K. Sherwood, Esq.  Philip J. Gross, Esq.  Keara M. Waldron, Esq.  65 Livingston Avenue  Roseland, New Jersey 07068  (973) 597-2500 (Telephone)  (973) 597-6247 (Facsimile)  slevine@lowenstein.com  jsherwood@lowenstein.com  pgross@lowenstein.com  kwaldron@lowenstein.com</p> <p>-and-</p> <p>Herbert A. Sanders, Esq.  THE SANDERS LAW FIRM PC  615 Griswold St., Suite 913  Detroit, MI 48226  (313) 962-0099 (Telephone)  (313) 962-0044 (Facsimile)  hsanders@miafscme.org</p> <p>-and-</p> <p>Richard G. Mack, Jr., Esq.  Miller Cohen, P.L.C.  600 West Lafayette Boulevard  4th Floor  Detroit, MI 48226-3191</p>

**Certificate of Service**

I, Stephen C. Hackney, hereby certify that on December 6, 2013, I caused the foregoing *Notice of Deposition of Gaurav Malhotra* to be filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter.

*/s/ Stephen C. Hackney*

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Stephen C. Hackney