

**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
)

**AMENDED NOTICE OF VIDEOTAPED
DEPOSITION OF GAURAV MALHOTRA**¹

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 **Wednesday, 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.

¹ *Changes from the original Notice of Videotaped Deposition of Gaurav Malhotra [Docket No. 1963] are noted in italic and underlined print herein.*

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

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.*

EXHIBIT 1

Party	Counsel for Party
<i>Syncora Guarantee Inc. and Syncora Capital Assurance Inc.</i>	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

Party	Counsel for Party
<p><i>Hypothekenbank Frankfurt AG; Hypothekenbank Frankfurt International S.A.; and Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A..</i></p>	<p>Howard S. Sher JACOB & WEINGARTEN, P.C. Somerset Place 2301 W. Big Beaver Road, Suite 777 Troy, Michigan 48084 Tel: (248) 649-1200 Fax: (248) 649-2920 E-mail: howard@jacobweingarten.com -and- Matthew G. Summers BALLARD SPAHR LLP 919 North Market Street, 11th Floor Wilmington, Delaware 19801 Tel: (302) 252-4428 Fax: (410) 361-8930 E-mail: summersm@ballardspahr.com -and- Vincent J. Marriott, III BALLARD SPAHR LLP 1735 Market Street, 51st Flr. Philadelphia, PA 19103 Phone: 215.864.8236 Fax: 215.864.9762 Email: marriott@ballardspahr.com</p>

Party	Counsel for Party
<i>FMS Wertmanagement AöR</i>	<p>Suzanne L. Wahl SCHIFF HARDIN LLP 350 S. Main Street, Ste. 210 Ann Arbor, Michigan 48104 (734) 222-1517 swahl@schiffhardin.com</p> <p>-and-</p> <p>Rick L. Frimmer Michael W. Ott SCHIFF HARDIN, LLP 233 S. Wacker Drive, Ste. 6600 Chicago, IL 60606 312-258-5500 Fax: 312-258-5600 rfrimmer@schiffhardin.com mott@schiffhardin.com</p>
<i>Retiree Association Parties</i>	<p>Co-Counsel for Retiree Association Parties Thomas R. Morris Karin F. Avery SILVERMAN & MORRIS, P.L.L.C. 30500 Northwestern Highway, Suite 200 Farmington Hills, Michigan 48334 (248) 539-1330 Fax: (248) 539-1355 morris@silvermanmorris.com avery@silvermanmorris.com</p> <p>-and-</p> <p>LIPPITT O'KEEFE, PLLC Brian D. O'Keefe Ryan C. Plecha 370 East Maple Road, 3rd Floor Birmingham, Michigan 48009 (248) 646-8292 Fax: (248) 646-8375 bokeefe@lippitokeefe.com rplecha@lippitokeefe.com</p>

Party	Counsel for Party
<i>Ambac Assurance Corporation</i>	<p>Carol Connor Cohen Caroline Turner English ARENT FOX LLP 1717 K Street, NW Washington, DC 20036-5342 (202) 857-6054 Carol.Cohen@arentfox.com</p> <p>-and-</p> <p>David L. Dubrow Mark A. Angelov ARENT FOX LLP 1675 Broadway New York, NY 10019 (212) 484-3900</p> <p>-and-</p> <p>SCHAFER AND WEINER, PLLC Daniel J. Weiner (P32010) Brendan G. Best (P66370) 40950 Woodward Ave., Ste. 100 Bloomfield Hills, MI 48304 (248) 540-3340 bbest@schaferandweiner.com</p>

Party	Counsel for Party
<p><i>National Public Finance Guarantee Corporation</i></p>	<p>Eric D. Novetsky Louis P. Rochkind JAFFE, RAITT, HEUER & WEISS, P.C. 2777 Franklin Road, Suite 2500 Southfield, MI 48034 Tel: (248) 351-3000 Fax: (248) 351-3082 Email: enovetsky@jaffelaw.com -and- Jeffrey E. Bjork SIDLEY AUSTIN LLP 555 West Fifth Street, Ste. 4000 Los Angeles, CA 90013 Tel: (213) 896-6000 Fax: (213) 896-6600 Email: jbjork@sidley.com -and- 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</p>
<p><i>Assured Guaranty Municipal Corp.</i></p>	<p>Lawrence A. Larose Samuel S. Kohn Marc D. Ashley Marc B. Roitman Chadbourne & Parke LLP 30 Rockefeller Plaza New York, NY 10012 Telephone: (212) 408-5100 llarose@chadbourne.com skohn@chadbourne.com mashley@chadbourne.com mroitman@chadbourne.com</p>

Party	Counsel for Party
<i>Financial Guaranty Insurance Company</i>	Ernest J. Essad Jr. Mark R. James WILLIAMS, WILLIAMS, RATTNER & PLUNKETT, P.C. 280 North Old Woodward Avenue, Suite 300 Birmingham, MI 48009 Telephone: (248) 642-0333 Facsimile: (248) 642-0856 Email: EJEssad@wwrplaw.com Email: mrjames@wwrplaw.com -and- Alfredo R. Pérez WEIL, GOTSHAL & MANGES LLP 700 Louisiana Street, Suite 1600 Houston, TX 77002 Telephone: (713) 546-5000 Facsimile: (713) 224-9511 Email: alfredo.perez@weil.com
<i>David Sole, Party in Interest</i>	Jerome D. Goldberg JEROME D. GOLDBERG, PLLC 2921 East Jefferson, Suite 205 Detroit, MI 48207 Phone: 313-393-6001 Fax: 313-393-6007 Email: apclawyer@sbcglobal.net
<i>Police and Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit</i>	Robert D. Gordon Shannon L. Deeby CLARK HILL PLC 151 South Old Woodward Avenue, Suite 200 Birmingham, Michigan 48009 Telephone: (248) 988-5882 Facsimile: (248) 988-2502 rgordon@clarkhill.com

Party	Counsel for Party
<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 *Amended Notice of Videotaped 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

Stephen C. Hackney