

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

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

**FINANCIAL GUARANTY INSURANCE COMPANY AMENDED  
DISCLOSURE OF EXHIBITS IN ADVANCE OF DECEMBER 17-19, 2013 HEARING**

1. Financial Guaranty Insurance Company (“**FGIC**”) hereby amends its previously-filed exhibit list [Docket No. 1979] and identifies the following exhibits that it may use at the evidentiary hearing related to the *Motion of Debtor for Entry of an Order (i) Authorizing the Assumption of that Certain Forbearance and Optional Termination Agreement Pursuant to Section 365(a) of the Bankruptcy Code, (ii) Approving Such Agreement Pursuant to Rule 9019, and (iii) Granting Related Relief* [Docket No. 157] (the “**Assumption Motion**”) and the *Motion of the Debtor for a Final Order Pursuant to 11 U.S.C. §§ 105, 362, 364(c)(1), 364(c)(2), 364(e), 364(f), 503, 507(a)(2), 904, 921 and 922 (i) Approving Post-Petition Financing, (ii) Granting Liens and Providing Superpriority Claim Status and (iii) Modifying Automatic Stay* [Docket No. 1520] (the “**Postpetition Financing Motion**”):

a. the exhibits listed in the *Statement of Stipulated Facts Regarding Motion of Debtor for Entry of an Order (i) Authorizing the Assumption of that Certain Forbearance and Optional Termination Agreement Pursuant to Section 365(a) of the Bankruptcy Code, (ii) Approving Such Agreement Pursuant to Rule 9019, and (iii) Granting Related Relief* [Docket No. 2061]; and

b. the exhibits listed below:

	<u>Ex. No.</u>
<b><u>Assumption Motion Exhibits</u></b>	
GRS Service Corporation Articles of Incorporation ( <i>Pérez Dec. Ex. D</i> ) <sup>1</sup> .....	1
PFRS Service Corporation Articles of Incorporation ( <i>Pérez Dec. Ex. E</i> ).....	2
Termination Consent Letter ( <i>Pérez Dec. Ex. I</i> ).....	3
TRO ( <i>Pérez Dec. Ex. S</i> ).....	4
FGIC Order of Rehabilitation, dated June 28, 2012.....	5
FGIC Rehabilitation Plan Approval Order, dated June 11, 2013.....	6
<b><u>Postpetition Financing Motion Exhibits</u></b>	
Project Piston Cash Flow Forecast – through FY 2017 (No Casino Trap; No DIP), dated 10/3/13 8:04 PM.....	7
Quarterly Report of the Emergency Manager, dated October 15, 2013.....	8
Project Piston Cash Flow Forecast – through FY 2017 (DIP Financing Scenario), dated 12/9/13 9:15 AM.....	9

2. FGIC reserves the right to use any Exhibits listed by the Debtor with respect to the Hearing regarding the Assumption Motion and the Postpetition Financing Motion.

3. FGIC reserves the right to use any Exhibits marked or identified in the depositions of the Debtor’s and other objecting parties’ witnesses with respect to the Assumption Motion and the Postpetition Financing Motion.

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<sup>1</sup> Declaration of Alfredo R. Pérez in Support of Limited Objection of Financial Guaranty Insurance Company to Motion of Debtor for Entry of an Order (i) Authorizing the Assumption of that Certain Forbearance and Optional Termination Agreement Pursuant to Section 365(a) of the Bankruptcy Code, (ii) Approving Such Agreement Pursuant to Rule 9019, and (iii) Granting Related Relief [Docket No. 360-1]

4. FGIC reserves the right to use any Exhibits listed by any of the other objecting parties with respect to the Hearing regarding the Assumption Motion and the Postpetition Financing Motion.

Dated: December 13, 2013  
Birmingham, Michigan

/s/ Mark R. James  
Ernest J. Essad Jr.  
Mark R. James  
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– and –

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Company*

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 13, 2013 the *Financial Guaranty Insurance Company Amended Disclosure of Exhibits in Advance of December 17-19, 2013 Hearing* was filed and served via the Court's electronic case filing and noticing system to all parties registered to received electronic notices in this matter.

/s/ Mark R. James  
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Dated: December 13, 2013