

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

In re:

Case No. 13-53846

CITY OF DETROIT, MICHIGAN

In Proceedings Under  
Chapter 9

Debtor.

Hon. Steven W. Rhodes

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**AMBAC ASSURANCE CORPORATION'S SECOND AMENDED EXHIBIT  
LIST FOR EVIDENTIARY HEARING ON DEBTOR'S ASSUMPTION  
(DKT. NO. 17/157) AND POST-PETITION FINANCING (DKT. NO. 1520)  
MOTIONS**

1. Ambac Assurance Corporation (“Ambac”) hereby amends its prior-filed exhibit list [Dkt. No. 1978] and identifies the following exhibits that it may use at the Evidentiary Hearing (the “Hearing”) [Dkt. No. 1864] related to the Debtor’s (1) Motion 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 (the “Assumption Motion”) [Dkt. No. 17/157]; and (2) Motion 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 (the “Post-Petition Financing Motion”) [Dkt. No. 1520]:

<b>Exhibit No.</b>	<b>Exhibit Description</b>
401	Detroit City Code § 18-5-120 <i>et. seq.</i> Ambac Assumption Obj. Ex. 1. [Dkt. No. 348-2]
402	GRS Articles of Incorporation. Ambac Assumption Obj. Ex. 2. [Dkt. No. 348-3]
403	PFRS Articles of Incorporation. Ambac Assumption Obj. Ex. 3. [Dkt. No. 348-4]
404	Offering Circular for 2006 COPs. Ambac Assumption Obj. Ex. 6. [Dkt. No. 348-7]
405	City of Detroit 2012 Comprehensive Annual Fiscal Report. Ambac Assumption Obj. Ex. 7. [Dkt. No. 348-8]
406	Detroit City Code § 18-16-1 <i>et. seq.</i> Ambac Assumption Obj. Ex. 8. [Dkt. No. 348-9]
*	Ambac reserves the right to use any Exhibits listed by the Debtor with respect to the Hearing regarding Dkt. Nos. 17/157, and 1520.
**	Ambac reserves the right to use any Exhibits marked or identified in depositions of the Debtor's and Objectors' witnesses with respect to Dkt. Nos. 17/157 and 1520.
***	Ambac reserves the right to use any Exhibits listed by any of the other Objectors with respect to the Hearing regarding Dkt. Nos. 17/157 and 1520.

Respectfully Submitted,

**ARENT FOX LLP**

Dated: December 16, 2013

By: /s/ Carol Connor Cohen  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of December, 2013 the foregoing Second Amended Exhibit List for Evidentiary Hearing on Debtor's Assumption and Post-Petition Financing Motions was filed with the Court's electronic case filing and noticing system and served on all parties registered to receive electronic notices in this matter.

/s/ Carol Connor Cohen