IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re: Chapter 9

CITY OF DETROIT, MICHIGAN Case No. 13-53846

Debtor. Hon. Steven W. Rhodes

NOTICE OF WITHDRAWAL OF ASSURED GUARANTY MUNICIPAL CORP.'S: (1) LIMITED OBJECTION (DOCKET NO. 1842) TO CITY'S POST-PETITION FINANCING MOTION; AND (2) JOINDER IN OBJECTION OF AMBAC ASSURANCE CORPORATION (DOCKET NO. 357) TO CITY'S ASSUMPTION MOTION

Assured Guaranty Municipal Corp., formerly known as Financial Security Assurance Inc. ("Assured"), a creditor and party in interest in the chapter 9 case of the City of Detroit, Michigan (the "City"), hereby withdraws (1) its Limited Objection to the 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 [Docket No. 1842] (the "Limited Objection"); and (2) its Joinder in Objection of Ambac Assurance Corporation to the 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 [Docket No. 357] (together with the Limited Objection, the "Objections").

This withdrawal is premised on the inclusion of certain provisions resolving the Objections, as agreed upon by Assured and the City, in the Notice of Revised Proposed Order in Connection with 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. 2148] (as such proposed order may be amended from time to time, the "Proposed Order"). Assured reserves the right to reinstate its Objections if, for any reason, the provisions resolving the Objections are omitted or deleted from the Proposed Order.

Dated: December 16, 2013 New York, New York

CHADBOURNE & PARKE LLP

By: <u>/s/ Lawrence A. Larose</u>

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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of December 2013, I caused the *Notice of Withdrawal of Assured Guaranty Municipal Corp.'s: (1) Limited Objection (Docket No. 1842) to City's Post-Petition Financing Motion; and (2) Joinder in Objection of Ambac Assurance Corporation (Docket No. 357) to City's Assumption Motion to be filed with the Clerk of the Court using the CM/ECF system, which provides electronic notification of such filing to all counsel of record.*

Dated: December 16, 2013 New York, New York

CHADBOURNE & PARKE LLP

By: <u>/s/ Lawrence A. Larose</u>
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