UNITED STATES BANKRUPTCY COURT 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 NATIONAL PUBLIC FINANCE GUARANTEE CORPORATION'S (1) OBJECTION TO CITY'S POST-PETITION FINANCING MOTION; AND (2) JOINDER IN OBJECTION OF AMBAC ASSURANCE <u>CORPORATION TO CITY'S ASSUMPTION MOTION</u>

National Public Finance Guarantee Corporation ("<u>National</u>"), by and through its undersigned attorneys, hereby withdraws (the "<u>Withdrawal</u>") (1) its Objection to 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. 1863] (the "<u>Financing Objection</u>"); and (2) its Joinder in the Objection of Ambac Assurance Corporation to the Motion for Entry of an Order Authorizing (I) the Assumption of that Certain Forbearance and Optional Termination Agreement Pursuant to Section 362(a) of the Bankruptcy Code, (II) Approving Such Agreement Pursuant to Rule 9019, and (III) Granting Related Relief [Docket No.

2662633.1

353] (the "<u>Swap Settlement Objection</u>" and with the Financing Objection, the "<u>Objections</u>").

The Withdrawal is based on the inclusion of provisions resolving the Objections, as agreed upon by National and the City of Detroit, in the Second 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. 2177] (as such proposed order may be amended from time to time, the "Proposed Order"). National reserves the right to reinstate its Objections if, for any reason, the provisions resolving the Objections are changed, omitted, or deleted from the Proposed Order.

Dated: December 19, 2013

JAFFE RAITT HEUER & WEISS, P.C.

By: <u>/s/ Paul R. Hage</u> Louis P. Rochkind (P24121) Paul R. Hage (P70460) 27777 Franklin Road, Suite 2500 Southfield, MI 48034-8214 Telephone: (248) 351-3000 <u>lrochkind@jaffelaw.com</u> phage@jaffelaw.com

-and-

2

SIDLEY AUSTIN LLP

Guy S. Neal 1501 K Street, N.W. Washington, D.C. 20005 Telephone: (202) 736-8041 gneal@sidley.com

Jeffrey E. Bjork Gabriel MacConaill 555 West Fifth Street, Suite 4000 Los Angeles, CA 90013 Telephone: (213) 896-6000 jbjork@sidley.com gmacconaill@sidley.com

Counsel for National Public Finance Guarantee Corp.