

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

In re:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

Re: Docket Nos. 2714, 2730

**JOINDER OF ASSURED GUARANTY MUNICIPAL CORP. IN  
THE OBJECTION TO MOTION OF THE DEBTOR FOR  
APPROVAL OF DISCLOSURE STATEMENT PROCEDURES**

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”),<sup>1</sup> hereby joins in the Objection to Motion of the Debtor for Approval of Disclosure Statement Procedures [Docket No. 2730] (the “Objection”). In support of this joinder, Assured adopts and incorporates the arguments in the Objection as if fully set forth herein, and respectfully submits as follows:

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<sup>1</sup> Assured is a creditor and/or party in interest as it is the bond insurer of certain of the City’s unlimited tax general obligation, sewer system, and water system bonds.

1. As set forth in the Objection, the Disclosure Statement<sup>2</sup> is grossly inadequate and lacks significant material economic information. Many documents that are critical to the Plan and referenced in the Plan and Disclosure Statement—and purportedly attached as exhibits thereto—have not been filed (if they even exist).

2. Notably, the Plan provides that each holder of Unlimited Tax General Obligation Bonds shall receive a pro rata share of “Plan UTGO Notes,” substantially on the terms set forth in Exhibit I.A.206. *See* Plan, at II.B.3, IV.B. However, Exhibit I.A.206—a mere summary of the “Principal Terms of Plan UTGO Notes”—has not been filed.

3. A “disclosure” document that does not even include a bare-bones summary of terms for new notes provides no disclosure at all. There is no way for holders of Unlimited Tax General Obligation Bonds to evaluate the proposed treatment. Accordingly, this Court should not even consider the City’s filing to be a “disclosure statement” within the meaning of Bankruptcy Rule 3016(b).

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection or the Plan.

WHEREFORE, for the reasons set forth herein and in the Objection, Assured respectfully requests that the Court (1) deny the City's Scheduling Motion, and (2) grant Assured such other and further relief as the Court may deem just and proper.

Dated: February 24, 2014  
New York, New York

**CHADBOURNE & PARKE LLP**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of February 2014, I caused the *Joinder of Assured Guaranty Municipal Corp. in the Objection to Motion of the Debtor for Approval of Disclosure Statement Procedures (Docket No.2730)* 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: February 24, 2014  
New York, New York

**CHADBOURNE & PARKE LLP**

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