

United States Code (the “Bankruptcy Code”) authorizing FGIC to intervene in the above-captioned adversary proceeding (the “Adversary Proceeding”). In support of the Motion, FGIC respectfully refers the Court to the Memorandum in Support attached hereto as Exhibit 3.

Jurisdiction

2. This Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334. The Court’s consideration of the Motion is a core proceeding. Venue is proper before this Court pursuant to 28 U.S.C. § 1409.

Statement of Concurrence Sought

3. Pursuant to Local Rule 9014-1(g), on March 14, 2014, counsel for FGIC sought the concurrence of counsel for the City in the relief sought in the Motion. As of the date of the filing of this Motion, such concurrence has not been given.

WHEREFORE FGIC respectfully requests that the Bankruptcy Court enter the Order, substantially in the form attached hereto as Exhibit 1, granting the relief requested herein and such other and further relief as the Court may deem just and proper.

Dated: March 17, 2014

Respectfully submitted,

/s/ Mark R. James
Ernest J. Essad Jr.
Mark R. James
WILLIAMS, WILLIAMS, RATTNER &
PLUNKETT, P.C.
280 North Old Woodward Avenue, Suite 300
Birmingham, MI 48009
Telephone: (248) 642-0333
Facsimile: (248) 642-0856
Email: EJEssad@wwrplaw.com
Email: mrjames@wwrplaw.com

– and –

Alfredo R. Pérez
WEIL, GOTSHAL & MANGES LLP
700 Louisiana Street, Suite 1600
Houston, TX 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511
Email: alfredo.perez@weil.com

– and –

Edward Soto
WEIL, GOTSHAL & MANGES LLP
1395 Brickell Avenue, Suite 1200
Miami, FL 33131
Telephone: (305) 577-3177
Facsimile: (305) 374-7159
Email: edward.soto@weil.com

*Attorneys for Financial Guaranty Insurance
Company*

ATTACHMENTS

Exhibit 1	Proposed Form of Order
Exhibit 2	Notice
Exhibit 3	Memorandum in Support
Exhibit 4	Certificate of Service
Exhibit 5	Pérez Declaration
Exhibit 6	Answer, Counterclaim, and Third-Party Complaint