

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

In re	)
	) Chapter 9
	)
CITY OF DETROIT, MICHIGAN,	) Case No. 13-53846
	)
Debtor.	) Hon. Steven W. Rhodes
_____	)

**NOTICE OF VIDEOTAPED DEPOSITION OF GAURAV MALHOTRA**

To: Parties on the attached **Exhibit 1** and **Exhibit 2**.

**PLEASE TAKE NOTICE** that, pursuant to Federal Rules of Civil Procedure 26 and 30, made applicable to this proceeding by Federal Rules of Bankruptcy Procedure 7026 and 7030, and the *Order Establishing Dates and Deadlines Regarding the Debtor's Motion to Assume Lease or Executory Contract* [Dkt. No. 281], Syncora Guarantee Inc. and Syncora Capital Assurance Inc. and all of the objecting parties set forth in **Exhibit 1**, attached hereto, by and through their attorneys of record, will take the deposition upon oral examination of **Gaurav Malhotra** at The Westin Book Cadillac, 1114 Washington Blvd, Conference Room: Founders AB, 3rd Floor, Detroit, Michigan 48226 on **Wednesday, August 28, 2013**, or at such other date or place to which the parties mutually agree. The deposition will begin at **1:00 p.m.**, and continue until completed. Mr. Malhotra's deposition will be taken before a court reporter or other person authorized by law to administer oaths and provide an official record of the deposition.

Mr. Malhotra's deposition will be recorded by stenograph and videotaped for the purpose of discovery, for use in the above-titled action, and for any other purpose permitted under the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure.

Dated: August 26, 2013

Respectfully submitted,

**KIRKLAND & ELLIS LLP**

By: /s/ Ryan Blaine Bennett

James H.M. Sprayregen, P.C.

Ryan Blaine Bennett

Stephen C. Hackney

KIRKLAND & ELLIS LLP

300 North LaSalle

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

- and -

Stephen M. Gross

David A. Agay

Joshua Gadharf

MCDONALD HOPKINS PLC

39533 Woodward Avenue

Bloomfield Hills, MI 48304

Telephone: (248) 646-5070

Facsimile: (248) 646-5075

*Attorneys for Syncora Guarantee Inc. and  
Syncora Capital Assurance Inc.*

**EXHIBIT 1**

**List of Objecting Parties**

<b>Objecting Party</b>	<b>Counsel for Objection Party</b>
<i>Syncora Guarantee Inc. and Syncora Capital Assurance Inc.</i>	James H.M. Sprayregen, P.C. Ryan Blaine Bennett Stephen C. Hackney KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, Illinois 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200 - and - Stephen M. Gross David A. Agay Joshua Gadharf MCDONALD HOPKINS PLC 39533 Woodward Avenue Bloomfield Hills, MI 48304 Telephone: (248) 646-5070 Facsimile: (248) 646-5075
<i>Erste Europäische Pfandbrieffund Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A.</i>	Howard S. Sher JACOB & WEINGARTEN, P.C. Somerset Place 2301 W. Big Beaver Road, Suite 777 Troy, Michigan 48084 Tel: (248) 649-1200 Fax: (248) 649-2920 E-mail: howard@jacobweingarten.com -and- Matthew G. Summers BALLARD SPAHR LLP 919 North Market Street, 11th Floor Wilmington, Delaware 19801 Tel: (302) 252-4428 Fax: (410) 361-8930 E-mail: summersm@ballardspahr.com

Objecting Party	Counsel for Objection Party
	-and- Vincent J. Marriott, III BALLARD SPAHR LLP 1735 Market Street, 51st Flr. Philadelphia, PA 19103 Phone: 215.864.8236 Fax: 215.864.9762 Email: marriott@ballardspahr.com
<i>DEPFA Bank PLC</i>	Suzanne L. Wahl SCHIFF HARDIN LLP 350 S. Main Street, Ste. 210 Ann Arbor, Michigan 48104 (734) 222-1517 swahl@schiffhardin.com -and- Rick L. Frimmer Michael W. Ott SCHIFF HARDIN, LLP 233 S. Wacker Drive, Ste. 6600 Chicago, IL 60606 312-258-5500 Fax: 312-258-5600 rfrimmer@schiffhardin.com mott@schiffhardin.com

Objecting Party	Counsel for Objection Party
<i>Retiree Association Parties</i>	Co-Counsel for Retiree Association Parties Thomas R. Morris Karin F. Avery SILVERMAN & MORRIS, P.L.L.C. 30500 Northwestern Highway, Suite 200 Farmington Hills, Michigan 48334 (248) 539-1330 Fax: (248) 539-1355 morris@silvermanmorris.com avery@silvermanmorris.com -and- LIPPITT O'KEEFE, PLLC Brian D. O'Keefe Ryan C. Plecha 370 East Maple Road, 3rd Floor Birmingham, Michigan 48009 (248) 646-8292 Fax: (248) 646-8375 bokeefe@lippittokeefe.com rplecha@lippittokeefe.com
<i>Retired Detroit Police Members Association</i>	Lynn M. Brimer Meredith E. Taunt Mallory Field (75289) STROBL & SHARP, P.C. 300 East Long Lake Road, Suite 200 Bloomfield Hills, MI 48304-2376 Telephone: (248) 540-2300 Facsimile: (248) 645-2690 E-mail: mtaunt@stroblpc.com
<i>Ambac Assurance Corporation</i>	Carol Connor Cohen Caroline Turner English ARENT FOX LLP 1717 K Street, NW Washington, DC 20036-5342 (202) 857-6054 Carol.Cohen@arentfox.com -and- David L. Dubrow Mark A. Angelov ARENT FOX LLP

Objecting Party	Counsel for Objection Party
	<p>1675 Broadway  New York, NY 10019  (212) 484-3900  -and-  <b>SCHAFFER AND WEINER, PLLC</b>  Daniel J. Weiner (P32010)  Brendan G. Best (P66370)  40950 Woodward Ave., Ste. 100  Bloomfield Hills, MI 48304  (248) 540-3340  bbest@schaferandweiner.com</p>
<p><i>National Public Finance Guarantee Corporation</i></p>	<p>Eric D. Novetsky  Louis P. Rochkind  <b>JAFFE, RAITT, HEUER &amp; WEISS, P.C.</b>  2777 Franklin Road, Suite 2500  Southfield, MI 48034  Tel: (248) 351-3000  Fax: (248) 351-3082  Email: enovetsky@jaffelaw.com  -and-  Jeffrey E. Bjork  <b>SIDLEY AUSTIN LLP</b>  555 West Fifth Street, Ste. 4000  Los Angeles, CA 90013  Tel: (213) 896-6000  Fax: (213) 896-6600  Email: jbjork@sidley.com  -and-  <b>SIDLEY AUSTIN LLP</b>  Guy S. Neal  1501 K Street, N.W.  Washington, DC 20005  Tel: (202) 736-8000  Fax: (202) 736-8711  Email: gneal@sidley.com</p>

Objecting Party	Counsel for Objection Party
<i>Assured Guaranty Municipal Corp.</i>	Lawrence A. Larose, Esq. Samuel S. Kohn, Esq. Carrie V. Hardman, Esq. WINSTON & STRAWN LLP 200 Park Avenue New York, NY 10166-4193 Telephone: (212) 294-6700 Facsimile: (212) 294-4700 Email: llarose@winston.com skohn@winston.com chardman@winston.com -and- Sarah T. Foss, Esq. WINSTON & STRAWN LLP 1111 Louisiana, 25th Floor Houston, Texas 77002-5242 Telephone: (713) 651-2600 Facsimile: (713) 651-2700 Email: sfoss@winston.com
<i>Financial Guaranty Insurance Company</i>	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@wvrplaw.com Email: mrjames@wvrplaw.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

Objecting Party	Counsel for Objection Party
<i>David Sole, Party in Interest</i>	Jerome D. Goldberg JEROME D. GOLDBERG, PLLC 2921 East Jefferson, Suite 205 Detroit, MI 48207 Phone: 313-393-6001 Fax: 313-393-6007 Email: apclawyer@sbcglobal.net
<i>Attorneys for DEPFA Bank, PLC, Solely in Its Capacity as Agent for FMS Wertmanagement</i>	Rick L. Frimmer Karen V. Newbury Michael W. Ott SCHIFF HARDIN LLP 233 South Wacker Drive Suite 6600 Chicago, IL 60606 Tel. 312-258-5500 Fax. 312-258-6500 Rfrimmer@schiffhardin.com knewbury@schiffhardin.com mott@schiffhardin.com
<i>Police and Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit</i>	Robert D. Gordon Shannon L. Deeby CLARK HILL PLC 151 South Old Woodward Avenue, Suite 200 Birmingham, Michigan 48009 Telephone: (248) 988-5882 Facsimile: (248) 988-2502 rgordon@clarkhill.com



**Certificate of Service**

I, Ryan Blaine Bennett, hereby certify that on August 26, 2013, I caused the foregoing *Notice of Videotaped Deposition of Gaurav Malhotra* to be filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter and via electronic mail to the parties set forth in **Exhibit 2**, attached hereto.

*/s/ Ryan Blaine Bennett*

\_\_\_\_\_  
Ryan Blaine Bennett

**EXHIBIT 2**

**Service List**

<b>Party</b>	<b>Counsel for Party</b>
<i>Attorneys for the City of Detroit</i>	<p>David G. Heiman Heather Lennox JONES DAY North Point 901 Lakeside Avenue Cleveland, Ohio 44114 Telephone: (216) 586-3939 Facsimile: (216) 579-0212 dgheiman@jonesday.com hlennox@jonesday.com</p> <p>Bruce Bennett JONES DAY 555 South Flower Street Fiftieth Floor Los Angeles, California 90071 Telephone: (213) 243-2382 Facsimile: (213) 243-2539 bbennett@jonesday.com</p> <p>Thomas F. Cullen, Jr. (DC 224733) Gregory M. Shumaker (DC 416537) Geoffrey S. Stewart (DC 287979) JONES DAY 51 Louisiana Ave., N.W. Washington, D.C. 20001 Telephone: (202) 879-3939 Facsimile: (202) 626-1700 tfcullen@jonesday.com gshumaker@jonesday.com gstewart@jonesday.com</p>

Party	Counsel for Party
	Robert S. Hertzberg (P30261) Deborah Kovsky-Apap (P68258) PEPPER HAMILTON LLP 4000 Town Center, Suite 1800 Southfield, MI 48075 Telephone: (248) 359-7300 Facsimile: (248) 359-7700 hertzbergr@pepperlaw.com kovskyd@pepperlaw.com
<i>Syncora Guarantee Inc. and            Syncora Capital Assurance Inc.</i>	James H.M. Sprayregen, P.C. Ryan Blaine Bennett Stephen C. Hackney KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, Illinois 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200 - and - Stephen M. Gross David A. Agay Joshua Gadharf MCDONALD HOPKINS PLC 39533 Woodward Avenue Bloomfield Hills, MI 48304 Telephone: (248) 646-5070 Facsimile: (248) 646-5075
<i>Erste Europäische Pfandbrieffund            Kommunalkreditbank Aktiengesellschaft in            Luxemburg S.A.</i>	Howard S. Sher JACOB & WEINGARTEN, P.C. Somerset Place 2301 W. Big Beaver Road, Suite 777 Troy, Michigan 48084 Tel: (248) 649-1200 Fax: (248) 649-2920 E-mail: howard@jacobweingarten.com -and- Matthew G. Summers BALLARD SPAHR LLP 919 North Market Street, 11th Floor

Party	Counsel for Party
	<p>Wilmington, Delaware 19801  Tel: (302) 252-4428  E-mail: summersm@ballardspahr.com  -and-  Vincent J. Marriott, III  BALLARD SPAHR LLP  1735 Market Street, 51st Flr.  Philadelphia, PA 19103  Phone: 215.864.8236  Fax: 215.864.9762  Email: marriott@ballardspahr.com  Fax: (410) 361-8930</p>
<p><i>DEPFA Bank PLC</i></p>	<p>Suzanne L. Wahl  SCHIFF HARDIN LLP  350 S. Main Street, Ste. 210  Ann Arbor, Michigan 48104  (734) 222-1517  swahl@schiffhardin.com  -and-  Rick L. Frimmer  Michael W. Ott  SCHIFF HARDIN, LLP  233 S. Wacker Drive, Ste. 6600  Chicago, IL 60606  312-258-5500  Fax: 312-258-5600  rfrimmer@schiffhardin.com  mott@schiffhardin.com</p>

Party	Counsel for Party
<i>Retiree Association Parties</i>	Co-Counsel for Retiree Association Parties Thomas R. Morris Karin F. Avery SILVERMAN & MORRIS, P.L.L.C. 30500 Northwestern Highway, Suite 200 Farmington Hills, Michigan 48334 (248) 539-1330 Fax: (248) 539-1355 morris@silvermanmorris.com avery@silvermanmorris.com -and- LIPPITT O'KEEFE, PLLC Brian D. O'Keefe Ryan C. Plecha 370 East Maple Road, 3rd Floor Birmingham, Michigan 48009 (248) 646-8292 Fax: (248) 646-8375 bokeefe@lippittokeefe.com rplecha@lippittokeefe.com
<i>Retired Detroit Police Members Association</i>	Lynn M. Brimer Meredith E. Taunt Mallory Field (75289) STROBL & SHARP, P.C. 300 East Long Lake Road, Suite 200 Bloomfield Hills, MI 48304-2376 Telephone: (248) 540-2300 Facsimile: (248) 645-2690 E-mail: mtaunt@stroblpc.com
<i>Ambac Assurance Corporation</i>	Carol Connor Cohen Caroline Turner English ARENT FOX LLP 1717 K Street, NW Washington, DC 20036-5342 (202) 857-6054 Carol.Cohen@arentfox.com -and- David L. Dubrow Mark A. Angelov ARENT FOX LLP

Party	Counsel for Party
	1675 Broadway New York, NY 10019 (212) 484-3900 -and- SCHAFFER AND WEINER, PLLC Daniel J. Weiner (P32010) Brendan G. Best (P66370) 40950 Woodward Ave., Ste. 100 Bloomfield Hills, MI 48304 (248) 540-3340 bbest@schaferandweiner.com
<i>National Public Finance Guarantee Corporation</i>	Eric D. Novetsky Louis P. Rochkind JAFFE, RAITT, HEUER & WEISS, P.C. 2777 Franklin Road, Suite 2500 Southfield, MI 48034 Tel: (248) 351-3000 Fax: (248) 351-3082 Email: enovetsky@jaffelaw.com -and- Jeffrey E. Bjork SIDLEY AUSTIN LLP 555 West Fifth Street, Ste. 4000 Los Angeles, CA 90013 Tel: (213) 896-6000 Fax: (213) 896-6600 Email: jbjork@sidley.com -and- SIDLEY AUSTIN LLP Guy S. Neal 1501 K Street, N.W. Washington, DC 20005 Tel: (202) 736-8000 Fax: (202) 736-8711 Email: gneal@sidley.com
<i>Assured Guaranty Municipal Corp.</i>	Lawrence A. Larose, Esq. Samuel S. Kohn, Esq. Carrie V. Hardman, Esq.

Party	Counsel for Party
	<p>WINSTON &amp; STRAWN LLP  200 Park Avenue  New York, NY 10166-4193  Telephone: (212) 294-6700  Facsimile. (212) 294-4700  Email: llarose@winston.com  skohn@winston.com  chardman@winston.com  -and-  Sarah T. Foss, Esq.  WINSTON &amp; STRAWN LLP  1111 Louisiana, 25th Floor  Houston, Texas 77002-5242  Telephone: (713) 651-2600  Facsimile: (713) 651-2700  Email: sfoss@winston.com</p>
<i>Financial Guaranty Insurance Company</i>	<p>Ernest J. Essad Jr.  Mark R. James  WILLIAMS, WILLIAMS, RATTNER &amp;  PLUNKETT, P.C.  280 North Old Woodward Avenue, Suite  300  Birmingham, MI 48009  Telephone: (248) 642-0333  Facsimile: (248) 642-0856  Email: EJEssad@wvrplaw.com  Email: mrjames@wvrplaw.com  -and-  Alfredo R. Pérez  WEIL, GOTSHAL &amp; MANGES LLP  700 Louisiana Street, Suite 1600  Houston, TX 77002  Telephone: (713) 546-5000  Facsimile: (713) 224-9511  Email: alfredo.perez@weil.com</p>

Party	Counsel for Party
<i>David Sole, Party in Interest</i>	Jerome D. Goldberg JEROME D. GOLDBERG, PLLC 2921 East Jefferson, Suite 205 Detroit, MI 48207 Phone: 313-393-6001 Fax: 313-393-6007 Email: apclawyer@sbcglobal.net
<i>Attorneys for DEPFA Bank, PLC, Solely in Its Capacity as Agent for FMS Wertmanagement</i>	Rick L. Frimmer Karen V. Newbury Michael W. Ott SCHIFF HARDIN LLP 233 South Wacker Drive Suite 6600 Chicago, IL 60606 Tel. 312-258-5500 Fax. 312-258-6500 Rfrimmer@schiffhardin.com knewbury@schiffhardin.com mott@schiffhardin.com
<i>Police and Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit</i>	Robert D. Gordon Shannon L. Deeby CLARK HILL PLC 151 South Old Woodward Avenue, Suite 200 Birmingham, Michigan 48009 Telephone: (248) 988-5882 Facsimile: (248) 988-2502 rgordon@clarkhill.com