
In the Matter of the Rehabilitation of:

Case No. 10 CV 1576

Segregated Account of Ambac Assurance Corporation

**NOTICE OF MOTION AND MOTION TO ENFORCE INJUNCTION AGAINST
ASSURED GUARANTY CORP. AND ASSURED GUARANTY RE LTD.**

TO: All Interested Parties

Attorneys Steven Klugman & Ana L. Frischtak
Debevoise & Plimpton LLP
919 Third Avenue
New York, NY 10022

Attorney James E. Bartzen
Boardman Suhr Curry & Field LLP
1 South Pinckney Street, 4th Floor
PO Box 927
Madison, WI 53701-0927

PLEASE TAKE NOTICE that the Commissioner of Insurance of the State of Wisconsin, as Court-appointed Rehabilitator of the Segregated Account of Ambac Assurance Corporation, moves the Court to enforce its March 24, 2010 injunction against parties-in-interest Assured Guaranty Corp. and Assured Guaranty Re Ltd. The Rehabilitator will present this motion before the Honorable William D. Johnston, presiding by judicial appointment, at the Lafayette County Courthouse, 626 Main Street, Darlington, Wisconsin, at a date and time to be determined by the Court. The hearing will be conducted in open court and will be open to the public and to all parties-in-interest.

The grounds for this Motion are set forth in the accompany brief and affidavit (with exhibits).

The Motion and other documents pertaining thereto have all been posted on the court-approved website for this proceeding, <http://ambacpolicyholders.com>. Consistent with Paragraph 2 of the Court's March 24, 2010 Order Regarding Form of Notice, the Web site serves as the official, court-approved means for effecting notice of all filings, orders, notices and hearings. Any policyholders and counterparties who lack regular access to either the Internet or a computer printer may receive a mailed hard copy of the motion or any other document posted on the website by mailing a request for "hard copy" service to:

Heidi Ernst
Foley & Lardner LLP
P.O. Box 1497
Madison, WI 53701-1497

Dated this 15th day of April, 2011.

FOLEY & LARDNER LLP

By:



Michael B. Van Sicklen, SBN 1017827
Naikang Tsao, SBN 1036747
Matthew R. Lynch, SBN 1066370

Counsel for the Rehabilitator

Michael B. Van Sicklen
Naikang Tsao
Matthew R. Lynch
150 East Gilman Street
Post Office Box 1497
Madison, Wisconsin 53701
Telephone: (608) 257-5035
Facsimile: (608) 258-4258