IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

) Case N	o.: Case No. 3:13-cv-00325
SEGREGATED ACCOUNT OF AMBAC ASSURANCE CORPORATION)))	
Plaintiff,)	
)	
v.)	
ONEWEST BANK, FSB)	
)	
Defendant.)	
	_)	

SUPPLEMENTAL STIPULATION TO EXTEND TIME FOR ONEWEST BANK, FSB
TO FILE ITS BRIEF IN OPPOSITION TO THE COMMISSIONER'S MOTION FOR
REIMBURSEMENT OF LEGAL EXPENSES PURSUANT TO COURT'S REMAND
ORDER OF JULY 8, 2013

The parties to this action -- OneWest Bank, FSB ("OneWest") and The Segregated Account of Ambac Assurance Corporation, by its court-appointed Rehabilitator (collectively, the "Parties") -- are in the process of negotiating a settlement of their disputes, including the only remaining issue in this action. They therefore stipulated that OneWest may have a short extension of time to file papers addressing that issue until this Friday, August 23, 2013, and the Court entered that stipulation as an order. (Dkt. No. 23.) Thereafter, a complication arose that has delayed completion of the settlement agreement. The Parties now anticipate that the settlement agreement will be completed sometime next week, and they have stipulated to a supplemental extension of OneWest's deadline to the end of next week.

More specifically, the Parties enter into this stipulation with reference to the following circumstances:

- 1. On July 8, 2013, the Court entered an Opinion and Order (Dkt. No. 17) (the "July 8 Order") by which it granted the Rehabilitator's motion to remand this action to the Dane County Circuit Court, and it gave the Rehabilitator until July 31, 2013 to submit an itemized request for fees and costs.
- 2. Pursuant to the July 8 Order, the Rehabilitator submitted a motion for reimbursement of legal expenses on July 30, 2013. (Dkt. No. 20.)
- 3. OneWest's deadline to file a brief in opposition was then set for August 20, 2013. (Dkt. No. 20.)
- 4. On August 16, 2013, in anticipation of reaching a settlement, the Parties filed a stipulation to extend the time for OneWest to file its opposition brief to August 23. (Dkt. No. 22.) On August 19, 2013, the Court approved the stipulation and granted OneWest the extension. (Dkt. No. 23.)
- 5. Thereafter, an unanticipated development has delayed completion of the settlement agreement. The Parties are working diligently to resolve the unanticipated development and finalize an agreement that would resolve their disputes, including the Rehabilitator's motion for reimbursement of legal expenses. The Parties anticipate the

settlement will be completed next week. The Parties, therefore, anticipate that the Court need

not resolve the Rehabilitator's motion, or any further issues in this action.

6. While the Parties anticipate that they will reach a final settlement agreement

shortly, they are not certain that the settlement agreement will be finalized by OneWest's August

23, 2013 deadline to file its brief in opposition to the motion for reimbursement of legal

expenses.

Accordingly, IT IS HEREBY STIPULATED AND AGREED between the Parties that

OneWest may have an extension of time to file its Opposition to the Rehabilitator's motion for

reimbursement of legal expenses, and that OneWest's new deadline shall be Friday, August 30,

at 1:00 pm central time.

Dated: August 23, 2013.

Respectfully submitted, GODFREY & KAHN S.C.

s/ James A. Friedman

James A. Friedman

Godfrey & Kahn S.C.

One East Main Street, Suite 500

P. O. Box 2719

Madison, WI 53701-2719

Telephone: (608) 284-2617

Fax: (608) 257-0609

jfriedma@gklaw.com

Attorneys for OneWest Bank, FSB

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ARNOLD & PORTER LLP

s/ Eric Shapland

Matthew T. Heartney

Eric Shapland

Emilia P. E. Morris

Arnold & Porter LLP

777 S. Figueroa St., 44th Floor

Los Angeles, CA 90017-5844

Telephone: (213) 243-4000

Fax: (213) 243-4199

Matthew.Heartney@aporter.com

Eric.Shapland@aporter.com

Emilia.Morris@aporter.com

Attorneys for OneWest Bank, FSB

FOLEY & LARDNER LLP

s/ Jeffrey A. Simmons

Michael B. Van Sicklen

Jeffrey A. Simmons

Matthew R. Lynch

150 East Gilman Street

Madison, WI 53703

Telephone: (608) 257-5035

Fax: (608) 258-4258

Attorneys for the Wisconsin Commissioner of Insurance, as Court-Appointed Rehabilitator of the

Segregated Account of Ambac Assurance

Corporation