

# **EXHIBIT 6**

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9 **AMBAC ASSURANCE CORPORATION**

10  
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **COUNTY OF MONTEREY**

13 Monterey Bay Military Housing LLC, and  
14 Monterey Bay Land LLC,

15 Plaintiffs,

16 v.

17 Ambac Assurance Corporation,

18 Defendant.

Case No.: 15CV000599

**RESPONSES TO PLAINTIFF'S  
REQUESTS FOR SPECIAL  
INTERROGATORIES  
(SET TWO)**

19 **PROPOUNDING PARTIES:** Monterey Bay Military Housing LLC and

20 Monterey Bay Land LLC

21 **RESPONDING PARTY:** Ambac Assurance Corporation

22 **SET NO.:** Two

1 **GENERAL OBJECTIONS**

2 1. Defendant Ambac Assurance Corporation (“Ambac”), generally objects to each  
3 Interrogatory to the extent it seeks information protected by the attorney-client privilege, attorney  
4 work product doctrine, or other applicable privilege, including, but not limited to, the privilege  
5 established by Wis. Stat. § 601.465.

6 2. Ambac objects to the Instructions and Definitions to the extent they seek to impose  
7 duties upon Ambac in excess of those required by California law.

8 3. An objection to a specific request does not imply that information and/or  
9 documents responsive to the request exist.

10 4. Ambac does not admit, adopt, or acquiesce in any factual or legal contention,  
11 assertion, or characterization that is contained in these requests.

12 5. The identification and/or production of any information (including, but not limited  
13 to the identification of any person) and/or document shall not be a waiver of any of the above, and  
14 the inadvertent disclosure of any privileged matter shall also not constitute a waiver of any of the  
15 above.

16  
17 **RESPONSES TO SPECIAL INTERROGATORIES**

18 **SPECIAL INTERROGATORY NO. 1:**

19 Identify all factual bases, including any and all Communications and Documents that  
20 support these factual bases, that support Your denial of Plaintiffs’ Request for Admission No. 2 in  
21 Your Response to Plaintiffs’ Requests For Admission (Set One) that You served on February 5,  
22 2016.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

24 Subject to the General Objections, Ambac responds that it had actual notice of Plaintiffs’  
25 failure to comply with Section 4.17 of the Construction Servicing Agreement when Plaintiffs  
26 failed to replace the Reserve Account Contract or cash fund within ten business days after notice  
27 from US Bank on October 6, 2015, that they must do so.



1 proceedings or otherwise.” See Disclosure Statement, at 1; see also March 24, 2010 Order of  
2 Rehabilitation at ¶ 2 (“This proceeding pertains solely to the Segregated Account and to the  
3 policies, contracts, rights, assets, equity ownership interests, and liabilities allocated to it in  
4 accordance with Wis. Stat § 611.24, and does not pertain to the policies, contracts, assets, equity  
5 ownership interests, and liabilities remaining in Ambac’s General Account.”).

6 Third, the Order did not authorize the taking of a material portion of Ambac’s property.

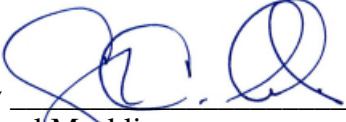
7 Fourth, even if anything allocated to the Segregated Account (as described in the Plan of  
8 Operation), could properly be considered “Ambac property,” it would not constitute a material  
9 portion of Ambac’s “property.” Virtually all of Ambac’s assets prior to the creation of the  
10 Segregated Account remained in Ambac after the Segregated Account was created.

11 Fifth, the Order was not appealed.

12 Documents supporting these facts are: the Order, pleadings in the Wisconsin Proceeding,  
13 including, without limitation, the Plan of Operation and other documents to be produced in the  
14 litigation.

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16 Dated: March 11, 2016

Respectfully submitted,  
**BRYAN CAVE LLP**

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19 By  \_\_\_\_\_  
20 Meryl Macklin  
Attorneys for Defendant  
21 AMBAC ASSURANCE CORPORATION  
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VERIFICATION

I, Gregory Mayer, am Managing Director of Ambac Assurance Corporation, and am authorized to make this verification on its behalf. I have read the document entitled **RESPONSES TO PLAINTIFF'S SPECIAL INTERROGATORIES (SET TWO)** and know its contents. I am informed and believe and on that ground state that the matters stated in the foregoing document are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 11, 2016 at New York, New York.

  
Gregory Mayer