

STATE OF WISCONSIN : CIRCUIT COURT : DANE COUNTY

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**In the Matter of the Rehabilitation of:**

**SEGREGATED ACCOUNT OF  
AMBAC ASSURANCE CORPORATION**

**Case No. 10 CV 1576  
Hon. Richard G. Niess**

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**REHABILITATOR'S NOTICE AND EXPEDITED MOTION FOR A SCHEDULING  
ORDER REGARDING THE REHABILITATOR'S MOTION TO FURTHER AMEND  
THE PLAN OF REHABILITATION CONFIRMED ON JANUARY 24, 2011 TO  
FACILITATE AN EXIT FROM REHABILITATION**

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TO: **VIA MESSENGER**

Hon. Richard G. Niess  
Dane County Circuit Courthouse  
Courtroom 5109  
215 S. Hamilton Street  
Madison, WI 53703

**VIA ELECTRONIC FILING &  
ELECTRONIC MAIL**

Counsel of Record

**NOTICE**

**PLEASE TAKE NOTICE** that on January 4, 2018, or as soon thereafter as counsel may be heard, the Commissioner of Insurance of the State of Wisconsin (the "**Rehabilitator**") of the Segregated Account (the "**Segregated Account**") of Ambac Assurance Corporation ("**AAC**"), will appear before Branch 9 of the Dane County Circuit Court, the Hon. Richard B. Niess presiding, located at 215 S. Hamilton Street, Madison, Wisconsin, Room 5109, to be heard on its Motion to Further Amend The Plan of Rehabilitation Confirmed On January 24, 2011 To Facilitate An Exit From Rehabilitation, together with a Brief in Support (together, the "**Motion**"); such hearing may be adjourned or continued at the Court's discretion.

## MOTION

The Rehabilitator hereby moves the Court for entry of the Scheduling Order to be entered without hearing and served on all Parties in these proceedings. The Scheduling Order sets dates and deadlines for the Court's consideration of the Second Amended Plan and governs the necessary actions of the parties leading up to the Confirmation Hearing as follows:

- November 24, 2017: Objection Deadline
- December 11, 2017: Response Deadline
- December 11, 2017: Pretrial Report Deadline
- December 14, 2017: Pretrial Conference
- January 4-5, 2018: Confirmation Hearing

The proposed Objection Deadline to the Second Amended Plan provides a 60-day period for notice and objection which, under the terms of trust agreements governing the payment of certain RMBS claims, is required to provide due notice to interested parties.

Because the Scheduling Order will govern the logistics and structure of these proceedings, the Rehabilitator requests that the Motion be heard *on an expedited basis* and the Scheduling Order be entered by the Court as soon as practicable after the filing of this Motion.

A proposed Scheduling Order is filed with this Motion.

The Rehabilitator further moves to amend the Caption to reflect the current status of this case as a rehabilitation proceeding pursuant to Ch. 645, as set forth above.

Dated at Milwaukee, Wisconsin this 25<sup>th</sup> day of September 2017.

**MICHAEL BEST & FRIEDRICH LLP**

By: *Electronically signed by John D. Finerty, Jr.*

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State of Wisconsin, as the Court Appointed  
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