

STATE OF WISCONSIN

CIRCUIT COURT
BRANCH 9

DANE COUNTY

In the Matter of the Rehabilitation of:

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

Segregated Account of Ambac Assurance Corporation

**NOTICE OF MOTION AND MOTION OF GENERAL ACCOUNT
STAKEHOLDERS' TO ADJOURN PROCEEDINGS ON THE
REHABILITATOR'S SEPTEMBER 25, 2017 MOTION TO FURTHER
AMEND THE PLAN OF REHABILITATION CONFIRMED ON
JANUARY 24, 2011 TO FACILITATE AN EXIT FROM REHABILITATION**

TO: **VIA MESSENGER**

**VIA ELECTRONIC FILING &
ELECTRONIC MAIL**

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

Counsel of Record

NOTICE

PLEASE TAKE NOTICE that on November 17, 2017, at 11:00 a.m., or as soon thereafter as counsel may be heard, Cyrus Capital Partners, L.P., Polygon Global Partners LLP, and Taconic Capital Advisors (the "General Account Stakeholders") 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, Courtroom 5109, to be heard on their Motion to Adjourn Proceedings on the Rehabilitator's September 25, 2017 motion to further amend the plan of rehabilitation confirmed on January 24, 2011 to facilitate an exit from rehabilitation.

MOTION

PURSUANT TO WIS. STAT. §§ 645.33(5) and 802.10, the General Account Stakeholders hereby move this Court for an Order adjourning proceedings on the Rehabilitator's September 25, 2017 motion to further amend the plan of rehabilitation confirmed on January 24, 2011 to facilitate an exit from rehabilitation. In support of the General Account Stakeholders' motion to adjourn, the General Account Stakeholders submit a Supporting Brief and the Affidavit of John F. Finnegan, sworn to on November 13, 2017, with accompanying exhibits.

Dated at Madison, Wisconsin this 13th day of November 2017.

Respectfully submitted,

**PETERSON, JOHNSON
& MURRAY, S.C.**

By *Electronically signed by Michael P. Crooks*

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—and—

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