

January 23, 2018

**VIA E-FILING**

Hon. Richard G. Niess  
Dane County Courthouse  
215 S Hamilton St. #1000  
Madison, WI 53703

Re: *In re the Matter of the Rehabilitation of: Segregated Account of Ambac Assurance Corp.*;  
Dane County Circuit Court Case No. 10-CV-1576

Dear Judge Niess:

The Rehabilitator filed today a Notice of Entry of Final Order in this case. As ordered by the Court, that Order is the Final Order for purposes of appeal.

This letter is to inform the Court and Parties that the Rehabilitator will not file a Motion to Amend the Court's Final Confirmation Order issued on January 22, 2018. The Second Amended Plan contains Article 6.8, entitled "Discharge and Release Injunction." It includes a provision that reads as follows:

All Entities will be permanently barred and enjoined from asserting against the Ambac Parties, or their respective successors or property or any of their respective current or former members, shareholders, affiliates, officers, directors, employees, advisors or agents, any and all Claims, Deferred Amounts, obligations, rights, Causes of Action or liabilities, based upon any act, omission, transaction, or other activity of any kind or nature in connection with the Segregated Account, the Proceeding, and the Proceeding Circumstances, other than as expressly provided for in this Plan.

(See Second Amended Plan, p. 51, Art. 6.8). In the Rehabilitator's judgment, the language in Article 6.8 is therefore sufficient as written. No amendment to the Final Order will be requested by the Rehabilitator.



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Sincerely,

**MICHAEL BEST & FRIEDRICH LLP**

***Electronically signed by Kimberly A. Streff***

KAS:sll

Enclosures

cc: All counsel of record (via Filing)

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