

STATE OF WISCONSIN : CIRCUIT COURT : DANE COUNTY

In the Matter of the Rehabilitation of the:

**SEGREGATED ACCOUNT OF
AMBAC ASSURANCE CORPORATION**

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

**REHABILITATOR'S NOTICE OF MOTION AND MOTION FOR INJUNCTIVE
RELIEF AND MOTION FOR CONTEMPT**

NOTICE

PLEASE TAKE NOTICE that on a date and at a time to be set by the Court, the Commissioner of Insurance of the State of Wisconsin (the “**Rehabilitator**”) of the Segregated Account (the “**Segregated Account**”) of Ambac Assurance Corporation (“**Ambac**”), will appear before Branch 9 of the Dane County Circuit Court, the Hon. Richard G. Niess presiding, located at 215 S. Hamilton Street, Madison, Wisconsin, Room 5109, to be heard on its Motion for Injunctive Relief against the MHPI Projects and Motion for Contempt against the Fort Bliss Project.

MOTIONS

PURSUANT TO WIS. STAT. CH. 785, SECTION 645.05 and prior orders of this Court, the Rehabilitator hereby moves the Court for Injunctive Relief (“**Injunction Order**”) to ensure that the Second Amended Plan of Rehabilitation and the “Order Granting the Rehabilitator’s Motion to Further Amend the Plan of Rehabilitation and Confirming the Second Amended Plan of Rehabilitation” dated January 22, 2018 (the “**Confirmation Order**”) are adhered to by the MHPI Projects going forward. As a separate and independent request, the Rehabilitator also

moves the Court for a finding of Contempt (“**Contempt Order**”) against the Fort Bliss Project. The basis of the motion for a Contempt Order is the conduct and arguments of the Fort Bliss Project in this Court and others that are contrary to the Confirmation Order.

In support of its Motions, the Rehabilitator also files herewith a combined Brief In Support For Injunctive Relief and Entry of a Contempt Order, the Affidavit of Andrew G. Spaniol, and the Affidavit of Counsel.

Dated at Milwaukee, Wisconsin this 7th day of February, 2018.

MICHAEL BEST & FRIEDRICH LLP

Electronically signed by John D. Finerty, Jr.

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Insurance of the State of Wisconsin, as the
Court Appointed Rehabilitator of the
Segregated Account of Ambac Assurance
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