

MOTION

The MHPI Projects, by their attorneys, Kravit, Hovel & Krawczyk s.c., hereby move the Court, pursuant to Wis. Stat. §§ 808.07 and 809.12, for a stay pending appeal of the enforcement and effect of this Court's February 7, 2018 injunction order, as well as a stay pending appeal of the enforcement and effect of the January 22, 2018 Confirmation Order to the extent it enjoins the MHPI Projects through the injunctive relief set forth in Article 6.8 or the declaratory relief set forth in Article 6.13 of the Second Amended Plan of Rehabilitation ("Plan") from arguing full faith and credit in other state courts or responding to Ambac's motion to reconsider the Amended Opinion and Order signed by the Circuit Court for Anne Arundel County, Maryland on January 18, 2018. The reasons and grounds for this Motion are set forth in the accompanying Brief in Support of the MHPI Projects' Motion for Stay Pending Appeal.

Dated this 6th day of March, 2018.

KRAVIT, HOVEL & KRAWCZYK s.c.

/s/ Stephen E. Kravit

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