

STATE OF WISCONSIN : CIRCUIT COURT : DANE COUNTY

In the Matter of the Rehabilitation of:

**SEGREGATED ACCOUNT OF
AMBAC ASSURANCE CORPORATION**

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

**REHABILITATOR'S MOTION TO DISSOLVE THE INJUNCTION
DATED FEBRUARY 7, 2018 AND
AMEND THE CONFIRMATION ORDER**

The Office of the Commissioner of Insurance of the State of Wisconsin (“OCI”), as the Court-Appointed Rehabilitator (the “**Rehabilitator**”) of the Segregated Account (“**Segregated Account**”) of Ambac Assurance Corporation (“**Ambac**”), hereby moves the Court for entry of an order to dissolve the injunction dated February 7, 2018 (“**February 7, 2018 Injunction**”) and to amend the Confirmation Order dated January 22, 2018. In support of this Motion, the Rehabilitator states as follows:

1. Dissolution of the Injunction and the proposed revised Article 6.13 is unopposed by the MHPI Projects.
2. Due to the unique circumstances of this case and the policy implications for OCI, the Rehabilitator hereby requests that the Court dissolve the February 7, 2018 Injunction.
3. Given that this Motion and dissolving the February 7, 2018 Injunction addresses and effectively resolves the only issue presented by the MHPI Project’s pending Motion for Reconsideration, the Rehabilitator hereby requests that this Court remove from the Court’s

calendar the May 10, 2018 hearing on MHPI Project's Motion for Reconsideration, which is now moot, and enter the Final Decree.

4. Additionally, due to the unique circumstances of this case and the policy implications for OCI, the Rehabilitator seeks to amend the January 22, 2018 Confirmation Order, and thereby amend Article 6.13 of the Second Amended Plan of Rehabilitation dated September 25, 2017, to clarify that Article 6.13 applies to "Policies" or related "Transactional Documents," which are defined by the Plan to be related to Policies allocated to the Segregated Account only.

5. Filed with this Motion is a proposed Order that amends the Confirmation Order and incorporates the changes that OCI seeks in this Motion.

Dated: May 4, 2018.

MICHAEL BEST & FRIEDRICH LLP

Electronically signed by John D. Finerty, Jr.

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