

In the Matter of the Rehabilitation of:

SEGREGATED ACCOUNT OF
AMBAC ASSURANCE CORPORATION

Case No. 10 CV 1576

**NOTICE OF MOTION AND MOTION BY U.S. BANK
NATIONAL ASSOCIATION, ACTING SOLELY IN ITS CAPACITY AS
TRUSTEE FOR CERTAIN SECURITIZATION TRUSTS, IN FURTHER
SUPPORT OF ITS MOTION TO INTERVENE AND TO MODIFY THE
COURT'S ORDER FOR TEMPORARY INJUNCTIVE RELIEF**

TO:

Mr. Sean Dilweg
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c/o Michael B. Van Sicklen
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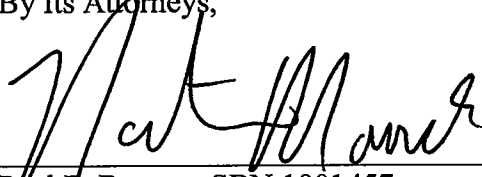
PLEASE TAKE NOTICE that U.S. Bank National Association (hereinafter, "Trustee"), acting solely in its capacity as trustee for certain residential mortgage-backed securities ("RMBS"), other asset-backed securities, collateralized loan obligation and/or collateralized debt obligation trusts (the "Trusts") insured by Ambac Assurance Corporation and/or its affiliates ("Ambac"), by its attorneys, at a time and place to be set by the Court, will move and does hereby move the Court as follows:

1. For an Order dissolving entirely the March 24, 2010 Order for Temporary Injunctive Relief ("Injunction Order") for the reasons set forth in the accompanying memorandum of law, or, alternatively;
2. For an Order modifying the terms of the Injunction Order by:
 - a. modifying Paragraph 7 to permit the Trustee to remit earned premiums and other payments for policies allocated to the Segregated Account into deal-specific escrow accounts until it is finally determined whether the Trusts' setoff rights may be enforced, without any resulting prejudice to the Trusts' coverage rights;
 - b. modifying Paragraphs 6, 9(b) and 9(c) to permit Trust investors to direct the Trustee, and to permit the Trustee to accept such directions and refuse any directions delivered by Ambac or OCI, in its capacity as Rehabilitator of the Segregated Account, if the relevant Transaction Document provides that direction or control rights have shifted from Ambac to such investors;
 - c. modifying slightly Paragraphs 9(b) and 9(c) to permit the parties to exercise their rights under the Transaction Documents to the extent that such rights do not arise out of the Events or from the financial condition of the Segregated Account, the Allocated Subsidiaries, or the Ambac General Account.
3. A prompt hearing on this Motion; and
4. Such other relief as the Court deems just and equitable.

The grounds for this Motion are set forth in the accompanying memorandum of law.

Respectfully submitted,

U.S. BANK NATIONAL ASSOCIATION, solely
in its capacity as Trustee,
By Its Attorneys,



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Dated: June 22, 2010
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