

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

_____	)	
In re	)	Case No. 13-53846
	)	
CITY OF DETROIT, MICHIGAN,	)	In Proceedings Under
	)	Chapter 9
Debtor.	)	
_____	)	Hon. Steven W. Rhodes

**AMBAC’S EX PARTE MOTION TO FILE A REPLY BRIEF  
IN EXCESS OF PAGE LIMITS**

Ambac Assurance Corporation (“Ambac”), a creditor in the above-captioned case, by and through its undersigned counsel, hereby moves the Court (the “*Ex Parte* Motion”), pursuant to Rule 9014-1(e) of the Local Rules for the United States Bankruptcy Court for the Eastern District of Michigan (the “Local Bankruptcy Rules”) and Rule 7.1(d) of the Local Rules for the United States District Court for the Eastern District of Michigan (the “Local Rules”), for the entry of an Order authorizing Ambac to file an objection (the “Objection”) to the Fourth Amended Plan for the Adjustment of debts of the City of Detroit [Dkt. 4392] (the “Fourth Amended Plan of Adjustment”),<sup>1</sup> in excess of the page limits imposed by Local Bankruptcy Rule 9014-1(e) (20 pages) (if applicable) and Local

<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.

Rule 7.1(d)(3) (25 pages). In support of this *Ex Parte* Motion, Ambac states as follows:

1. On May 5, 2014, the City filed the Fourth Amended Plan of Adjustment for this Court's approval, along with the Fourth Amended Disclosure Statement with Respect to the Fourth Amended Plan of Adjustment [Dkt. No. 4391] ("Fourth Amended Disclosure Statement"), and a Notice of Filing of Redline Versions of (A) Fourth Amended Plan of Adjustment and (B) Fourth Amended Disclosure Statement with Respect to Fourth Amended Plan of Adjustment [Dkt. No. 4394] ("Notice of Filing of Redline Versions").

2. Combined, the Fourth Amended Plan of Adjustment, the Fourth Amended Disclosure Statement, and the Notice of Filing of Redline Versions total 1,418 pages.

3. Local Rule 7.1(d)(3)(A), made applicable in this case by Local Bankruptcy Rule 9029-1(a), states that an objection may not exceed 25 pages. E.D. Mich. LR 7.1(d)(3)(A).

4. Due to the length, complexity, and importance of the Fourth Amended Plan of Adjustment, Ambac requires more than 25 pages to respond meaningfully. Accordingly, Ambac respectfully requests that it be granted relief from Local Rule 7.1(d)(3)(A) to permit it to file an Objection in excess of the page limitations.

**WHEREFORE**, Ambac respectfully requests that the Court enter an order substantially in the form attached hereto as **Exhibit 1**: (i) granting the relief sought herein, and (ii) granting such other and further relief to Ambac as the Court deems just and proper.

Respectfully Submitted,

**ARENT FOX LLP**

Dated: May 12, 2014

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*Counsel for Ambac Assurance Corporation*

## SUMMARY OF ATTACHMENTS

The following documents are attached to this Motion, labeled in accordance with Local Bankruptcy Rule 9014-1(b):

**Exhibit 1** – Proposed Order

**Exhibit 2** – None [Motion Seeks *Ex Parte* Relief]

**Exhibit 3** – None [Brief Not Required]

**Exhibit 4** – Certificate of Service

**Exhibit 5** – None [No Affidavits Filed Specific to This Motion]

**Exhibit 6** – None [No Documentary Exhibits Filed Specific to this Motion]

# Exhibit 1

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
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In re	)	
	)	Case No. 13-53846
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CITY OF DETROIT, MICHIGAN,	)	In Proceedings Under
	)	Chapter 9
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	)	Hon. Steven W. Rhodes

**ORDER AUTHORIZING AMBAC TO FILE  
AN OBJECTION IN EXCESS OF PAGE LIMITS**

This matter coming before the Court on Ambac’s<sup>2</sup> *Ex Parte* Motion to File an Objection In Excess of Page Limits (the “*Ex Parte* Motion”), and the Court being fully advised in the premises,

**IT IS HEREBY ORDERED THAT:**

1. The *Ex Parte* Motion is GRANTED.
2. Ambac is granted relief from Local Bankruptcy Rule 9014-1(e) and Local Rule 7.1(d) and may file an objection in excess of 25 pages.

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<sup>2</sup> Capitalized terms not otherwise defined have the meanings given to them in the *Ex Parte* Motion.

# Exhibit 4

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of May, 2013 the foregoing *Ex Parte* Motion to File an Objection in Excess of Page Limits was filed with the Court's electronic case filing and noticing system and served on all parties registered to receive electronic notices in this matter.

/s/ Carol Connor Cohen