

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

No. 13-53846

Chapter 9

HON. STEVEN W. RHODES

**STIPULATION AND AGREEMENT REGARDING THE
SUBPOENAS FROM FINANCIAL GUARANTY INSURANCE
COMPANY (DKT. #5477)**

THE PARTIES STIPULATE AND AGREE, through their attorneys, to the following with respect to the Financial Guaranty Insurance Company's ("FGIC") subpoenas to Governor Rick Snyder, Dennis Muchmore, and witness(es) pursuant to Federal Rules of Civil Procedure 30(b)(6) on behalf of the Executive Office of the Governor of the State of Michigan (collectively, the "State Parties") (Dkt. #5477):

1. The depositions of the State Parties noticed in the subpoenas for July 3, 2014 are adjourned without date.

2. FGIC agrees to first depose the witness(es) designated by the State Parties as the most knowledgeable about the Deposition Topics listed in its subpoena at a date, time, and location mutually agreed

upon by the Parties. FGIC further agrees that it will seek the depositions of Governor Snyder and Dennis Muchmore only if the witness(es) produced by the State to address the Deposition Topics are unable to address the Deposition Topics in full.

3. The deadline to produce documents pursuant to the document requests attached to the subpoenas is adjourned without date.

4. FGIC withdraws document requests nos. 2, 3, 4, and 6 of each of the subpoenas.

5. The State Parties and FGIC will continue to discuss issues relating to all outstanding, non-withdrawn requests –document requests nos. 1, 5, 7, 8, 9, 10, 11, 12 – and in the event that the parties cannot reach agreement concerning the scope of those requests, the parties agree to request a conference with the Court in an attempt to resolve the issues. FGIC and the State Parties reserve their rights with respect to document requests nos. 1, 5, 7, 8, 9, 10, 11, and 12 in the event the limitations agreed to by the Parties during their July 2, 2014 meet and confer, agreements contained in this Stipulation, and further discussions between the parties, prove unfruitful.

6. The deadline for the State Parties to file objections to the document requests is extended without date.

7. With the exception of the matters contained in this stipulation: (i) each of the parties reserves its respective rights and remedies; and (ii) nothing in this stipulation shall prejudice the parties or constitute a waiver of such rights and remedies.

Respectfully submitted:

/s/ Steven G. Howell

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Dated: July 2, 2014

/s/ Edward Soto

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Dated: July 2, 2014