

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

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: :  
In re : Chapter 9  
: :  
CITY OF DETROIT, MICHIGAN, : Case No. 13-53846  
: :  
Debtor. : Hon. Steven W. Rhodes  
: :  
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**STIPULATION FOR AN ORDER AUTHORIZING AMBAC ASSURANCE CORPORATION AND BLACKROCK FINANCIAL MANAGEMENT, INC. TO CHANGE THEIR VOTES ON THE CITY'S PLAN OF ADJUSTMENT**

The City of Detroit (the "City"), Ambac Assurance Corporation ("Ambac") and BlackRock Financial Management, Inc., on behalf of its managed funds and accounts reflected in Exhibit 1 ("BlackRock," and together with the City and Ambac, the "Parties"), by and through their respective undersigned counsel, stipulate as follows:

1. On May 5, 2014, the City filed the *Fourth Amended Plan for the Adjustment of Debts of the City of Detroit* (Docket No. 4392) (as it has been and may be further modified, amended or supplemented, the "Plan"). Capitalized terms not otherwise defined herein have the meanings given to them in the Plan.
2. On March 11, 2014, the Court entered the *Order (I) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or*

*Reject Plan of Adjustment and (II) Approving Notice Procedures Related to Confirmation of the Plan of Adjustment* (Docket No. 2984) (the "Solicitation Procedures Order").

3. On June 9, 2014, the Court entered the *Fifth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to Debtor's Plan of Adjustment* (Docket No. 5259) (the "Scheduling Order"). The Scheduling Order established July 11, 2014 as the deadline for submitting ballots to vote on the Plan.

4. Pursuant to the Solicitation Procedures Order and the Scheduling Order, Ambac and BlackRock submitted timely ballots rejecting the Plan with respect to Class 7 Limited Tax General Obligation ("LTGO") Bond Claims.

5. Prior to the July 11, 2014 voting deadline, the City reached an agreement with Ambac and BlackRock regarding the treatment of Class 7 claims (the "LTGO Settlement"), and Ambac delivered to counsel for the City a superseding ballot changing its Class 7 vote to a "yes" vote, which was to be held in escrow pending the final documentation of the LTGO Settlement.

6. As a result of the Parties' agreement regarding the treatment of Class 7 claims and the completion of the final documentation of the LTGO Settlement, Ambac and BlackRock believe that the Plan should be approved with

respect to the LTGO Bond Claims, and each of Ambac and BlackRock desires to change its votes rejecting the Plan to a vote accepting the Plan.

7. Accordingly, the Parties have agreed, pursuant to Federal Rule of Bankruptcy Procedure 3018(a), that Ambac and BlackRock shall be permitted to submit new ballots to the City's balloting agent, Kurtzman Carson Consultants, and that such new ballots shall (a) accept the Plan, (b) be deemed timely and (c) supersede any previous Class 7 ballots submitted by Ambac and BlackRock.

Dated: July 25, 2014

**ARENT FOX**

/s/ Carol Connor Cohen

Carol Connor Cohen  
Caroline Turner English  
Randall Brater  
1717 K Street, NW  
Washington, DC 20036-5342  
(202) 857-6054  
Email: Carol.Cohen@arentfox.com

David L. Dubrow  
Mark A. Angelow  
1675 Broadway  
New York, NY 10019  
(212) 484-3900

-and-

**SCHAFFER AND WEINER, PLLC**

Daniel J. Weiner (P32010)  
Brendan G. Best (P66370)  
40950 Woodward Ave, Ste. 100  
Bloomfield Hills, MI 48304  
(248) 540-3340  
Email: bbest@schaferandweiner.com

ATTORNEYS FOR AMBAC  
ASSURANCE CORPORATION

**JONES DAY**

/s/ Heather Lennox

David G. Heiman (OH 0038271)  
Heather Lennox (OH 0059649)  
JONES DAY  
North Point  
901 Lakeside Avenue  
Cleveland, Ohio 44114  
Telephone: (216) 586-3939  
Facsimile: (216) 579-0212  
dgheiman@jonesday.com  
hlennox@jonesday.com

Bruce Bennett (CA 105430)  
JONES DAY  
555 South Flower Street  
Fiftieth Floor  
Los Angeles, California 90071  
Telephone: (213) 243-2382  
Facsimile: (213) 243-2539  
bbennett@jonesday.com

Jonathan S. Green (MI P33140)  
Stephen S. LaPlante (MI P48063)  
MILLER, CANFIELD, PADDOCK  
AND STONE, P.L.C.  
150 West Jefferson  
Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 963-6420  
Facsimile: (313) 496-7500  
green@millercanfield.com  
laplante@millercanfield.com

ATTORNEYS FOR THE CITY

**KRAMER LEVIN NAFTALIS &  
FRANKEL LLP**

/s/ Amy Caton

Amy Caton  
1177 Avenue of the Americas  
New York, NY 10036  
(212) 715-7772  
Email: [acaton@kramerlevin.com](mailto:acaton@kramerlevin.com)

-and-

**STEINBERG SHAPIRO & CLARK**

Geoffrey T. Pavlic, Esq.  
25925 Telegraph Road, Suite 203  
Southfield, MI 48033  
(248) 352-4700  
[pavlic@steinbergshapiro.com](mailto:pavlic@steinbergshapiro.com)

ATTORNEYS FOR BLACKROCK  
FINANCIAL MANAGEMENT, INC.

## **EXHIBIT 1**

BlackRock Core Bond Trust  
BlackRock Income Opportunity Trust, Inc.  
BlackRock High Yield Municipal Fund  
BlackRock Global Funds - Fixed Income Global Opportunities Fund  
Ford Motor Company Defined Benefit Master Trust  
BlackRock MuniAssets Fund, Inc.  
BlackRock MuniAssets Fund, Inc.  
The Obsidian Master Fund  
United Technologies Stable Value (Met SA 100C) FIGO Portfolio

**EXHIBIT 2**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
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**ORDER AUTHORIZING AMBAC ASSURANCE CORPORATION  
AND BLACKROCK FINANCIAL MANAGEMENT, INC. TO  
CHANGE THEIR VOTES ON THE CITY'S PLAN OF ADJUSTMENT**

This matter came before the Court on the Stipulation for an Order Authorizing Ambac Assurance Corporation and BlackRock Financial Management, Inc. to Change Their Votes on the City's Plan of Adjustment (the "Stipulation"), filed by the City of Detroit (the "City"), Ambac Assurance Corporation ("Ambac") and BlackRock Financial Management, Inc. ("BlackRock"). The Court has reviewed the Stipulation and finds that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b) and (c) there is cause under Federal Rule of Bankruptcy Procedure 3018(a) to permit Ambac and BlackRock to change their Class 7 votes on the City's plan of adjustment.



Accordingly, IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED.
2. Ambac and BlackRock shall, within two business days of the entry of this Order, submit superseding ballots changing their Class 7 votes to "yes" votes accepting the City's Plan.

**CERTIFICATE OF SERVICE**

I, Heather Lennox, hereby certify that the foregoing Stipulation for an Order Authorizing Ambac Assurance Corporation and BlackRock Financial Management, Inc. to Change Their Votes on the City's Plan of Adjustment, was filed and served via the Court's electronic case filing and noticing system on this 25th day of July, 2014.

/s/ Heather Lennox \_\_\_\_\_