

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

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

***EX PARTE* MOTION OF SYNCORA GUARANTEE, INC. AND
SYNCORA CAPITAL ASSURANCE, INC. FOR AN *EX PARTE*
ORDER ENLARGING THE TIME FOR SYNCORA GUARANTEE,
INC. AND SYNCORA CAPITAL ASSURANCE, INC. TO FILE PRE-
TRIAL BRIEF**

Syncora Guarantee, Inc. and Syncora Capital Assurance, Inc. (“Syncora”) hereby move the Court, through its undersigned counsel, for entry of an order pursuant to Federal Rule of Bankruptcy Procedure 9006(b) and Local Rule 9006-1(b) enlarging the time for Syncora to file a pre-trial brief. When filing its pre-trial brief via the ECF system, Syncora was locked out of the PACER system due to hyperlinks contained in its Exhibit 33. Attached as **Exhibit 6** is a copy of an e-mail from Alexandra Schwarzman to Heather Lennox, counsel for the City, seeking consent of the Debtor to this Motion. As of the filing of this Motion, no consent was received.

RELIEF REQUESTED

WHEREFORE, Syncora respectfully requests that this Court (i) enter an order substantially in form attached hereto as **Exhibit 1**, granting the relief

requested herein; and (ii) grant such other and further relief to the Committee as the Court may deem proper.

Dated: August 28, 2014

Respectfully submitted,

/s/ Stephen C. Hackney
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- and -

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*Attorneys for Syncora Guarantee Inc. and
Syncora Capital Assurance Inc.*

Exhibit 1

**UNITED STATES BANKRUPTCY COURT
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***EX PARTE* ORDER ENLARGING THE TIME FOR SYNCORA
GUARANTEE, INC. AND SYNCORA CAPITAL ASSURANCE, INC.
TO FILE PRE-TRIAL BRIEF**

This matter coming before the Court on the *ex parte* motion (the “Motion”) of Syncora Guarantee, Inc. and Syncora Capital Assurance, Inc. (“Syncora”) for an order enlarging the time for it to file a Pre-Trial Brief;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. Syncora may file its Pre-Trial Brief after 12:00am (EDT) on August 28, 2014.

Exhibit 6

Schwarzman, Alexandra

From: Schwarzman, Alexandra
Sent: Thursday, August 28, 2014 12:14 AM
To: Heather Lennox
Cc: Bennett, Ryan Blaine; Hackney, Stephen C.
Subject: Pacer Lockout

Heather,

When filing our pretrial brief earlier this evening, we got kicked out of PACER because of hyperlinks contained in Exhibit 33. We are requesting your consent to file our pretrial brief outside of time?

Thanks,
Alex

Alex Schwarzman

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