

**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
)

**JOINT MOTION OF SYNCORA AND THE CITY OF DETROIT FOR
ADJOURNMENT OF THE HEARING**

Syncora Capital Assurance Inc. and Syncora Guarantee Inc. (“Syncora”) and the City of Detroit (the “City” or the “Debtor”) submit this joint motion for an adjournment of the hearing on the City’s Plan of Adjustment (“Motion to Adjourn”) until 8:30 a.m. ET on September 12, 2014 in light of the fact that Syncora and the City have reached an agreement in principle and need 48 hours to address certain conditions and logistics. We also note for the Court that if this agreement is finalized within this time period as we expect, it will profoundly alter the course of the proceeding and the litigation plans of the remaining parties.

WHEREFORE, for the foregoing reasons, Syncora and the City respectfully request that this Court enter an order adjourning the hearing on the City’s Plan of Adjustment until 8:30 a.m. September 12, 2014. Syncora and the City will be available at 8:30 a.m. ET September 10, 2014 to address any concerns the Court may raise.

Dated: September 9, 2014

Respectfully submitted,

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Attorneys for the City of Detroit

Exhibit 1
Proposed Order

**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
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ORDER GRANTING JOINT MOTION FOR ADJOURNMENT

This matter having come before the Court on Syncora’s and the City’s Joint Motion for Adjournment (the “Motion for Adjournment”), the Court having reviewed the Motion for Adjournment, and the Court having determined that the legal and factual bases set forth in the Motion for Adjournment establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Motion for Adjournment is GRANTED;
2. The hearing on the City’s Plan of Adjustment is adjourned until 8:30 a.m. ET on September 12, 2014;
3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

IT IS SO ORDERED.

Exhibit 2

Notice of Motion and Opportunity to Object

**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
)	

**NOTICE OF JOINT MOTION OF SYNCORA AND THE CITY OF
DETROIT FOR ADJOURNMENT OF THE HEARING**

PLEASE TAKE NOTICE that on September 9, 2014, Syncora Guarantee Inc., Syncora Capital Assurance Inc. and the City of Detroit (collectively, “Syncora and the City”) filed the *Joint Motion of Syncora and the City of Detroit for Adjournment of the Hearing* in the United States Bankruptcy Court for the Eastern District of Michigan (the “Bankruptcy Court”) to adjourn the hearing on the City’s Plan of Adjustment (“Motion to Adjourn”) until 8:30 a.m. ET on September 12, 2014.

PLEASE TAKE FURTHER NOTICE that your rights may be affected by the relief sought in the Motion. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Bankruptcy Court to grant the Objectors’ Motion or you want the Bankruptcy Court to consider your views on the Motion, by September 24, 2014¹, you or your attorney must:

¹ Concurrently herewith, Syncora and the City are seeking expedited consideration and shortened notice of the Motion. If the Court grants such expedited consideration and shortened notice, Syncora and the City will file and serve notice of the new response deadline.

File with the Bankruptcy Court a written response to the Motion, explaining your position, electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to:²

United States Bankruptcy Court
Theodore Levin Courthouse
231 West Lafayette Street
Detroit, MI 48226

You must also serve a copy of any objection or response upon:

James H.M. Sprayregen, P.C.
Ryan Blaine Bennett
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² A response must comply with F. R. Civ. P. 8(b), (c) and (e).

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If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting such relief.

Dated: September 9, 2014

Respectfully submitted,

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Exhibit 3

None [Brief Not Required]

Exhibit 4

Certificate of Service [To be filed separately]

Exhibit 5
Affidavits
[Not Applicable]

Exhibit 6

**Documentary Exhibits
[Not Applicable]**