

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**EX PARTE MOTION OF ASSURED GUARANTY MUNICIPAL
CORP. TO FILE OBJECTION IN EXCESS OF PAGE LIMIT**

Assured Guaranty Municipal Corp., formerly known as Financial Security Assurance Inc. (“Assured”),¹ a creditor and party in interest in the above-captioned chapter 9 case of the City of Detroit, Michigan (the “City”), 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 Assured to file an objection (the “Objection”) to the *Motion of the City of Detroit for Approval of the Proposed Disclosure Statement* [Docket No. 2713] (the “Motion”), in excess of the page limits imposed

¹ Assured is a monoline insurer that provides financial guarantees to the U.S. public finance market. Assured and its affiliates insure or reinsure approximately \$2.24 billion in gross aggregate principal amount of outstanding bonds issued by the City, including water supply system bonds, sewage disposal system bonds, and unlimited tax general obligation bonds.



by Local Bankruptcy Rule 9014-1(e) (if applicable) and Local Rule 7.1(d)(3). In support of this *Ex Parte* Motion, Assured states as follows:

1. Assured seeks to file an Objection to the Motion, dated February 21, 2014.

2. Local Bankruptcy Rule 9014-1(e), if applicable, restricts Assured's Objection to twenty pages. See E.D. Mich. LBR 9014-1(e). Local Rule 7.1(d)(3)(A), made applicable in this case by Local Bankruptcy Rule 9029-1(a), restricts Assured's Objection to twenty five pages. See E.D. Mich. LR 7.1(d)(3)(A).

3. Assured submits that it requires more pages than are provided by the applicable rules to meaningfully address the numerous complex issues that have been raised in this matter. The Objection is 37 pages (including the signature block). Accordingly, Assured respectfully requests that it be granted relief from Local Bankruptcy Rule 9014-1(e) and Local Rule 7.1(d)(3)(A), to the extent required, such that it is permitted to file its Objection in excess of the page limitations.

WHEREFORE, Assured 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 Assured as the Court deems just and proper.

Dated: New York, New York
April 7, 2014

CHADBOURNE & PARKE LLP

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SUMMARY OF ATTACHMENTS

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

Exhibit 1 – Proposed Form of Order

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

Exhibit 3 – None [Brief Not Required]

Exhibit 4 – None [Separate Certificate of Service to Be Filed]

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

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

EXHIBIT 1

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**EX PARTE ORDER ALLOWING OBJECTION
IN EXCESS OF PAGE LIMITS**

This matter coming before the Court on Assured Guaranty Municipal Corp.'s *Ex Parte* Motion to File an Objection In Excess of Page Limit (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. Assured² is granted relief from Local Bankruptcy Rule 9014-1(e) and Local Rule 7.1(d) and may file an Objection in excess of the applicable page limitations.

² Capitalized terms not otherwise defined herein shall have the meaning given to them in the *Ex Parte* Motion.