UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN Debtor.	In Proceedings Under Chapter 9 Hon. Steven W. Rhodes
_____/	

***EX PARTE* MOTION OF AMBAC ASSURANCE CORPORATION TO FILE OBJECTION IN EXCESS OF PAGE LIMIT**

Ambac Assurance Corporation ("Ambac"), by and through its undersigned attorneys, 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 Ambac to file an objection (the "Objection") to the *Amended Disclosure Statement with Respect to Amended Plan of Adjustment of Debts of the City of Detroit* [Dkt. 3382] (the "Amended Disclosure Statement") in excess of the page limit imposed by Local Bankruptcy Rule 9014-1(e) (20 pages) and Local Rule 7.1(d)(3)(A) (25 pages). In support of this Ex Parte Motion, Ambac states as follows:

1. Ambac, a creditor and party in interest in the above-captioned case, seeks to file an Objection to the Amended Disclosure Statement that is

approximately twenty-nine pages long. Local Bankruptcy Rule 9014-1(e) may restrict Ambac's Objection to twenty pages. Local District Court Rule 7.1(d)(3)(A), made applicable in this case by Local Bankruptcy Rule 9029-1(a), may restrict Ambac's Supplemental Objection to twenty-five pages.

3. The City's Amended Disclosure Statement, including exhibits, is over 600 pages long. Ambac submits that it requires more than twenty-five pages to respond to it meaningfully. Accordingly, Ambac 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, Ambac 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 the Ambac as the Court deems just.

Dated: April 7, 2014

/s/ Carol Connor Cohen

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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 LIMIT

This matter coming before the Court on Ambac Assurance Corporation's *Ex Parte Motion to File 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. Ambac[1] is granted relief from Local Bankruptcy Rule 9014-1(e) and Local Rule 7.1(d) and may file its Objection in excess of the applicable page limitations.

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