

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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	: Index No. 401265/2012
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In the Matter of the Rehabilitation of	: Doris Ling-Cohan, J.
FINANCIAL GUARANTY INSURANCE	:
COMPANY.	: Motion Sequence No. 4
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**NOTICE OF WITHDRAWAL OF OBJECTIONS OF  
AURELIUS CAPITAL MANAGEMENT, LP TO PLAN OF  
REHABILITATION FOR FINANCIAL GUARANTY INSURANCE  
COMPANY SUBJECT TO ENTRY OF REVISED PLAN APPROVAL ORDER**

Aurelius Capital Management, LP ("**Aurelius**"), by and through its undersigned attorneys, respectfully submits the following notice of withdrawal of (i) *Objection and Joinder of Aurelius Capital Management, LP to (I) the Objection of U.S. Bank National Association and U.S. Bank Trust National Association, each in its Capacity as Trustee, to the Plan of Rehabilitation Dated September 27, 2012, and (II) the Objections of The Bank of New York Mellon and The Bank of New York Mellon Trust Company, N.A., as Trustee to the Proposed Plan of Rehabilitation, dated November 19, 2012 (the "**Plan Objection**")*, (ii) *Amended Objection of Aurelius Capital Management, LP to the Proposed Plan of Rehabilitation and Joinder to the Amended Objections of The Bank of New York Mellon and The Bank of New York Mellon Trust Company, N.A., as Trustee to the Proposed Plan of Rehabilitation, dated January 22, 2013 (the "**Amended Plan Objection**")* and (iii) *Memorandum of Law in Support of the Amended Objection of Aurelius Capital Management, LP to the Proposed Plan of Rehabilitation and Joinder to the Amended Objections of The Bank of New York Mellon and The Bank of New York Mellon Trust Company, N.A., as Trustee to the Proposed Plan of Rehabilitation, dated January*

22, 2013 (the “**Memorandum**” and, together with the Plan Objection and the Amended Plan Objection, the “**Plan Objections**”):

1. On September 27, 2012, the Superintendent of Financial Services of the State of New York, as the court-appointed rehabilitator (the “**Rehabilitator**”) of Financial Guaranty Insurance Company (“**FGIC**”) filed the Plan of Rehabilitation for Financial Guaranty Insurance Company, dated September 27, 2012.
2. On November 19, 2012, Aurelius filed the Plan Objection.
3. On December 12, 2012, the Rehabilitator filed the First Amended Plan of Rehabilitation for Financial Guaranty Insurance Company, dated December 12, 2012, which addressed certain objections raised by objecting parties.
4. On January 22, 2013, Aurelius filed the Amended Plan Objection and the Memorandum.
5. On April 12, 2013, the Rehabilitator filed a revised version of the First Amended Plan of Rehabilitation for Financial Guaranty Insurance Company, dated April 12, 2013 (the “**April 12 Plan**”), which further addressed certain objections raised by objecting parties.
6. Subsequently, Aurelius participated in discussions with the Rehabilitator to resolve the Plan Objections. As a result, Aurelius and the Rehabilitator reached agreements regarding certain revisions to the April 12 Plan and the proposed order approving the April 12 Plan (the “**Proposed Plan Approval Order**”), which revisions fully resolve the Plan Objections and are reflected in the First Amended Plan of Rehabilitation for Financial Guaranty Company,


dated June 4, 2013, and a revised version of the Proposed Plan Approval Order, filed with the Court on June 4, 2013.

WHEREFORE, the Plan Objections are withdrawn with prejudice effective upon entry of the Proposed Plan Approval Order containing the finding in (e) and the ordered language in paragraph 7 and otherwise substantially in the form filed with the Court on June 4, 2013 approving the Plan.

Dated: June 4, 2013  
New York, New York

Respectfully submitted,

**DECHERT LLP**

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