

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

In the Matter of the Rehabilitation of  
FINANCIAL GUARANTY INSURANCE  
COMPANY.

Index No. 401265/2012

Doris Ling-Cohan, J.

Motion Sequence #

**NOTICE OF WITHDRAWAL OF OBJECTIONS OF CHILDRENS HEALTH  
PARTNERSHIP HOLDINGS PTY LTD TO PLAN OF REHABILITATION FOR  
FINANCIAL GUARANTY INSURANCE COMPANY**

Childrens Health Partnership Holdings Pty Ltd (ACN 127 920 496), in its capacity as trustee of the CHP Holdings Unit Trust (“**CHP Holdings**”) for itself and on behalf of Childrens Health Partnership Pty Ltd (ACN 119 703 445) in its capacity as trustee of the CHP Unit Trust (“**CHP**”) and Ancora (RCH) Pty Ltd (ACN 127 920 754) (“**Ancora RCH**”) (each, an “**Obligor**” and, together, the “**Obligors**”) respectfully submits the following notice of withdrawal of CHP Holdings’ November 19, 2012 limited objection and January 22, 2013 amended limited objection (the “**Plan Objections**”) to the Plan of Rehabilitation (the “**Plan**”) filed by the Superintendent of Financial Services of the State of New York, as rehabilitator to FGIC (the “**Rehabilitator**”).

1. Subsequent to filing the Plan Objections, the Obligors, the Rehabilitator and various other interested parties negotiated in good faith in an attempt to resolve the Plan Objections.

2. On April 16, 2013, the Obligors, the Rehabilitator and various other interested parties finalized the Termination Agreement, a true and correct copy of which is


attached hereto as **Exhibit A** (the "**Termination Agreement**"), which, among other things, resolved the Plan Objections. The Termination Agreement has been separately submitted to the Court for approval.

3. PLEASE TAKE NOTICE that, based upon its entry into the Termination Agreement, CHP Holdings hereby WITHDRAWS the Plan Objections on behalf of itself and the Obligors, *provided* that such withdrawal is without prejudice to CHP Holdings' right to reinstate the Plan Objections in accordance with the terms and conditions of Section 5(iv) of the Termination Agreement.

Dated: New York, NY  
April 30, 2013

Respectfully submitted,

Linklaters LLP

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Holdings Pty Ltd as trustee of the CHP  
Holdings Unit Trust and as attorneys for each  
other Obligor named herein*