

In the Matter of Rehabilitation of: )  
 )  
 Segregated Account of Ambac )  
 Assurance Corporation )  
 )

Case No. 10 CV 1576

**NOTICE OF MOTION AND MOTION OF ONE STATE STREET LLC TO  
 DISSOLVE OR MODIFY ORDER FOR TEMPORARY INJUNCTIVE RELIEF  
 AND TO INTERVENE**

**TO:**

Honorable William D. Johnston  
 Lafayette County Circuit Court  
 626 Main Street  
 P.O. Box 40  
 Darlington, Wisconsin 53530

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*State of Wisconsin*  
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Capital Management, L.P., Monarch  
Alternative Capital LP, Stonehill Capital  
Management LLC*

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***U.S. Bank National Association;  
Deutsche Bank National Trust Company,  
solely in its capacity as Trustee; Deutsche  
Bank Trust Company Americas, solely in  
its capacity as Trustee***

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PLEASE TAKE NOTICE that the Intervening Party, One State Street, LLC ("One State Street"), the landlord for the world headquarters of Ambac Assurance Corporation ("Ambac"), by its attorneys, Garvey McNeil & Associates, S.C. and Ropes & Gray LLP, at a time and place to be set by the Court,<sup>1</sup> will move and do hereby move this Court as follows:

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<sup>1</sup> One State Street notes that a hearing is currently set on related matters for July 9, 2010, and such a hearing date would be acceptable to One State Street.

1. To the extent procedurally required, to intervene in this action pursuant to paragraph 12 of this Court's *Order for Temporary Injunctive Relief* dated March 24, 2010 (the "TRO"), as an interested party yet reserving all rights to challenge jurisdiction;

2. For an order declaring that the allocation of the Headquarters Lease (as defined in the attached brief in support of this motion) to the Segregated Account was and is unlawful;

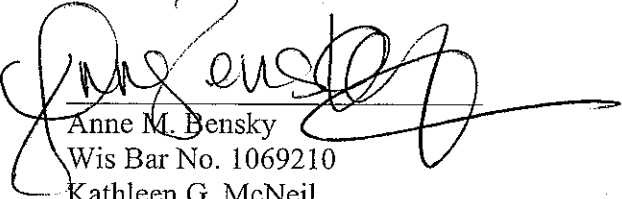
3. For an order modifying or dissolving the TRO, specifically with respect to paragraphs 1-5, 7, 8 and 13 of the TRO; the Headquarters Landlord and the Headquarters Lease should be entirely exempted from the operation of those paragraphs; and

4. For an order granting such other relief as is just and proper under the circumstances.

Support for this motion is set forth in the attached *Memorandum of Law in Support of Motion of One State Street LLC for Dissolution or Modification of Temporary Injunction* dated June 22, 2010.

Respectfully submitted on June 22, 2010.

**GARVEY McNEIL & ASSOCIATES, S.C.**  
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--and--

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