

STATE OF WISCONSIN : CIRCUIT COURT DANE COUNTY

In the Matter of the Rehabilitation of:

Case No.: 10-CV-1576

Segregated Account of Ambac Assurance Corporation

**STIPULATION REGARDING USE OF AFFIDAVITS OF
WILLIAM BARBAGALLO, FREDERICH BINGHAM AND THEA WATKINS
AT PLAN CONFIRMATION HEARING**

IT IS HEREBY STIPULATED AND AGREED, by and between (A) the Commissioner of Insurance of the State of Wisconsin, in his capacity as the Court-appointed Rehabilitator of the Segregated Account of Ambac Assurance Corporation (the "Rehabilitator"), (B) Access to Loans for Learning Student Loan Corporation ("ALL Student Loan"), and (C) Lloyd's TSB Bank plc ("Lloyd's Bank"), as follows:

1. For the convenience of the parties and to help facilitate the orderly and efficient presentation of proofs and arguments at the hearing regarding the Rehabilitator's Proposed Plan of Confirmation, currently scheduled to commence on November 15, 2010 (the "Plan Confirmation Hearing"), subject to the reserved evidentiary objections of the Rehabilitator set forth below, the following affidavits, all of which were previously filed with the Court in this proceeding, shall be deemed admitted in evidence and shall constitute part of the record of the Plan Confirmation Hearing:

- a. Affidavit of William C. Barbagallo, dated August 31, 2010;
- b. Affidavit of Frederich J. Bingham, dated August 31, 2010;

- c. Affidavit of Thea Watkins, dated June 22, 2010; and
- d. Affidavit of Thea Watkins, dated August 31, 2010.

2. Based upon this stipulation, William C. Barbagallo, Frederick J. Bingham, and Thea Watkins will not appear in person at the Plan Confirmation Hearing. The Rehabilitator reserves and may assert all evidentiary objections to statements contained in the affidavits as if those statements had been made during live testimony at the Plan Confirmation Hearing.

3. The Rehabilitator's Disclosure Statement (including written amendments and supplements thereto) and any written responses of the Rehabilitator to written questions filed by interested persons on or about November 8, 2010, and affidavits previously filed by the Rehabilitator in this proceeding, shall be deemed admitted in evidence and shall constitute part of the record of the Plan Confirmation Hearing.

- 4. This Stipulation may be signed in counterpart and by facsimile or email.

Dated this 12th day of November, 2010.



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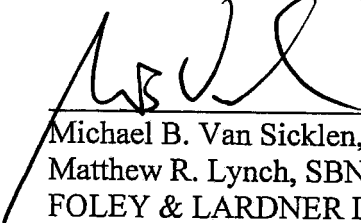
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Dated this 12th day of November, 2010.

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*Attorneys for Wisconsin Office of the
Commissioner of Insurance and the
Commissioner of Insurance of the State of
Wisconsin, as the Court-Appointed
Rehabilitator of the Segregated
Account of Ambac Assurance Corporation*