In the Matter of the Rehabilitation of:

Segregated Account of Ambac Assurance Corporation

Case No.

10CV1576

## MOTION FOR TEMPORARY INJUNCTIVE RELIEF

Pursuant to the authority granted under Chapter 645 of the Wisconsin Statutes, the Office of the Commissioner of Insurance (the "Commissioner") hereby moves the Court for immediate injunctive relief in order to protect the interests of insureds and creditors of the segregated account of Ambac Assurance Corporation, as well as the public. Wis. Stat. §§ 645.01(4) & 645.05(1). The grounds for this Motion are detailed in the accompanying brief.

Consistent with the remedial purposes of Chapter 645 of the Wisconsin Statutes, the Commissioner requests that the Court enter the requested first-day, temporary injunctive relief as set forth in the proposed form of order attached hereto.

By:

Dated this 24th day of March, 2010.

THIS IS AN AUTHENTHRATED COPY OF THE OF IGINAL DOCUMENT FILED WITH THE DANE COUNTY CLERK OF CIRCUIT COURT.

FOLEY & LARDNER LLP

David G. Walsh Michael B. Van Sicklen

Matthew R. Lynch

150 East Gilman Street

Post Office Box 1497

Madison, Wisconsin 53701

Telephone: (608) 257-5035

Facsimile: (608) 258-4258

Kevin G. Fitzgerald Andrew A. Oberdeck

777 East Wisconsin Avenue

Milwaukee, Wisconsin 53202

Telephone: (414) 271-2400

Facsimile: (414) 297-4900

CARLO ESQUEDA

Michael B. Van Sicklen, SBN 1017827

Matthew R. Lynch, SBN 1066370

Attorneys for Petitioner Sean Dilweg, Commissioner of Insurance of the State of

Wisconsin