

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

C. Alan Walker, in his capacity as  
Secretary for the Department of  
Community and Economic  
Development,

Petitioner,

v.

City of Harrisburg,

Respondent

No. 569 M.D. 2011

RECEIVED & FILED  
COMMONWEALTH COURT  
OF PENNSYLVANIA  
2013 DEC 23 P 1:07

**NOTICE OF CONSUMMATION OF  
THE HARRISBURG STRONG PLAN**

Comes now William B. Lynch, Receiver for the City of Harrisburg in the above captioned matter, and pursuant to Paragraph I of this Court's Order dated September 23, 2013, advises the Court that the Conditions to Consummation, as that term is defined in the Harrisburg Strong Plan (the "Plan"), have been satisfied.

As such: (i.) the asset transactions contemplated by the Plan have been completed and are effective; (ii.) the various settlement agreements that were a material component of the Plan have all be executed and are now effective according to their terms; and (iii.) the required payments or distributions to the

City of Harrisburg and to various creditors as contemplated by the Plan have now been made.

Respectfully submitted,

MCKENNA LONG & ALDRIDGE LLP

Date: December 23, 2013

By: 

Mark S. Kaufman, Esq.  
Georgia Bar No. 409194  
Joseph Krolikowski, Esq.  
Pennsylvania Bar No. 26300  
B. Summer Chandler  
Georgia Bar No. 120521  
303 Peachtree Street, N.E.  
Suite 5300  
Atlanta, Georgia 30308  
Tel: (404) 527-4000  
Fax: (404) 527-4198  
[mkaufman@mckennalong.com](mailto:mkaufman@mckennalong.com)  
[jkrolikowski@mckennalong.com](mailto:jkrolikowski@mckennalong.com)  
[schandler@mckennalong.com](mailto:schandler@mckennalong.com)

*Attorneys for William B. Lynch, in his  
official capacity as Receiver for the City of  
Harrisburg*

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

C. Alan Walker, in his capacity as  
Secretary for the Department of  
Community and Economic  
Development,

Petitioner,

v.

City of Harrisburg,

Respondent

No. 569 M.D. 2011

CERTIFICATE OF SERVICE

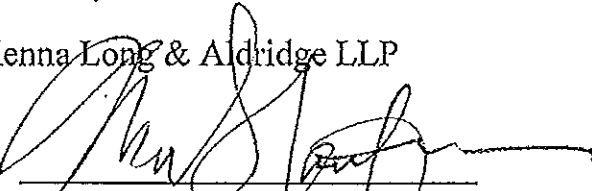
The undersigned hereby certifies that, through counsel, William B. Lynch, in his capacity as Receiver for the City of Harrisburg, caused true and correct copies of the NOTICE OF CONSUMMATION OF THE HARRISBURG STRONG PLAN to be served, via first class mail, postage prepaid upon the individuals identified on Exhibit A hereto at the addressees indicated on Exhibit A.

Dated: December 23, 2013

Respectfully submitted,

McKenna Long & Aldridge LLP

By:



Mark S. Kaufman, Esq.

Georgia Bar No. 409194

Joseph Krolikowski, Esq.

Pennsylvania Bar No. 26300

B. Summer Chandler

Georgia Bar No. 120521

303 Peachtree Street, N.E.

Suite 5300

Atlanta, Georgia 30308

Tel: (404) 527-4000

Fax: (404) 527-4198

[mkaufman@mckennalong.com](mailto:mkaufman@mckennalong.com)

[jkrolikowski@mckennalong.com](mailto:jkrolikowski@mckennalong.com)

[schandler@mckennalong.com](mailto:schandler@mckennalong.com)

*Attorneys for William B. Lynch, in his official  
capacity as Receiver for the City of Harrisburg*

EXHIBIT A

<p>The Honorable C. Alan Walker          Department of Community and Economic          Development          Commonwealth Keystone Building          400 North Street, 4th Floor          Harrisburg, PA 17120          (866) 466-3972</p>	<p>The Honorable Linda Thompson          Mayor of the City of Harrisburg          Dr. Martin Luther King, Jr.          Government Center          10 North 2nd Street          Harrisburg, PA 17101          (717) 255-3040</p>
<p>The Harrisburg City Council          c/o Kirk Petroski, Chief City Clerk          Office of City Clerk/City Council          Dr. Martin Luther King, Jr. Government          Center          10 North Second Street, Suite 1 Lower          Level          Harrisburg, PA 17101          (717) 258-6500</p>	<p>Neil Anthony Grover          Attorney at Law          2201 N 2nd St          Harrisburg, PA 17110          (717) 260-9651  <i>(Attorney for the Harrisburg City          Council)</i></p>
<p>Kenneth W. Lee          Post &amp; Schell, P.C.          17 North Second Street          12th Floor          Harrisburg, PA 17101          (717) 612-6035  <i>(Attorneys for the Mayor of the City of          Harrisburg)</i></p>	<p>Brian Allen Kint          Cozen O'Connor          1900 Market St          Philadelphia, PA 19103          (215) 665-4686  <i>(Attorneys for C. Alan Walker, DCED          Secretary)</i></p>
<p>Scott T. Wyland          Salzmann Hughes PC          105 N. Front Street, Suite 205          Harrisburg, PA 17101          (717) 249-6333  <i>(Attorneys for certain Suburban          Municipalities)</i></p>	<p>Eric Louis Scherling          Cozen O'Connor          1900 Market St          Philadelphia, PA 19103          (215) 665-2042  <i>(Attorneys for C. Alan Walker, DCED          Secretary)</i></p>

<p>Jeffrey G. Weil  Neal David Colton  Stephen Aaron Miller  Cozen O'Connor  1900 Market St  Philadelphia, PA 19103  (215) 665-2060  <i>(Attorneys for C. Alan Walker, DCED Secretary)</i></p>	<p>Edward Lee Stinnett, II  Salzmann Hughes PC  105 N. Front Street, Suite 205  Harrisburg, PA 17101  (717) 249-6333  <i>(Attorneys for certain Suburban Municipalities)</i></p>
<p>Nevin J. Mindlin  2550 N. 3rd Street  Harrisburg, PA 17110  (717) 238-8705  <i>(Debt Watch Harrisburg)</i></p>	<p>Lee E. Morrison  420 Lamp Post Lane  Camp Hill, PA 17011  (717) 761-9090  <i>(Attorney for Harrisburg City Council)</i></p>
<p>Markian Roman Slobodian  Law Offices of Markian R. Slobodian  801 N 2nd St  Harrisburg, PA 17102—3213  (717) 232-5180  <i>(Attorneys for Ambac Assurance Corporation)</i></p>	<p>Marck Joachim  Arent Fox LLP  1050 Connecticut Ave., NW  Washington, DC 20036  (202) 857-6018  <i>(Attorneys for Ambac Assurance Corporation)</i></p>
<p>Howard B. Klein  Law Office of Howard Bruce Klein, P.C.  1700 Market Street, Suite 3025  Philadelphia, PA 19103  (215) 972-1411  <i>(Attorneys for David Unkovic)</i></p>	<p>Geoffrey R. Johnson  Sprague &amp; Sprague  1110 Wellington Road  Jenkintown, PA 19046  (215) 490-7436  <i>(Attorneys for Mark D. Schwartz)</i></p>

<p>Daniel L. Sullivan  Saidis, Flower &amp; Lindsay  Saidis Sullivan &amp; Rogers  26 W High St  Carlisle, PA 17013  (717) 243-6222  <i>(Attorneys for County of Dauphin)</i></p>	<p>Charles B. Zwally  Ronald L. Finck  Mette, Evans &amp; Woodside  3401 N Front St  PO Box 5950  Harrisburg, PA 17110  (717) 232-5000  <i>(Attorneys for County of Dauphin)</i></p>
<p>Paul M. Hummer  Matthew M. Haar  Saul Ewing LLP  Centre Square West  1500 Market Street, 38th Floor  Philadelphia, PA 19102-2186  (215) 972-7777  <i>(Attorneys for Assured Guaranty  Municipal Corp.)</i></p>	<p>James S. Gkonos  Saul Ewing LLP  Centre Square West  1500 Market Street, 38<sup>th</sup> Floor  Philadelphia, PA 19102-2186  (215) 972-8667  <i>(Attorneys for Assured Guaranty  Municipal Corp.)</i></p>
<p>Daniel C. Miller  Harrisburg City Controller  City of Harrisburg  10 N. 2nd Street – Suite 403  Harrisburg, PA 17101  (717) 234-2250  <i>(Pro se)</i></p>	