

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

-----X	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
-----X	:	

**CERTIFICATION OF NO RESPONSE OR OBJECTION  
REGARDING MOTION OF DEBTOR, PURSUANT TO  
SECTIONS 105(A) AND 107 OF THE BANKRUPTCY CODE,  
FOR ENTRY OF AN ORDER (A) AUTHORIZING AND DIRECTING  
CITY OFFICIALS TO RELEASE CERTAIN INFORMATION  
REGARDING POTENTIAL TAX CREDITORS AND (B) AUTHORIZING  
FILING OF SUCH INFORMATION UNDER SEAL (Docket No. 706)**

On September 3, 2013, the Motion of Debtor, Pursuant to Sections 105(a) and 107 of the Bankruptcy Code, for Entry of an Order (A) Authorizing and Directing City Officials to Release Certain Information Regarding Potential Tax Creditors and (B) Authorizing the Filing of Such Information Under Seal (Docket No. 706) (the "Motion"), was filed with this Court and served by the City of Detroit, Michigan (the "City"), on the parties identified on the Certificate of Service (Docket No. 767) attached hereto as Exhibit A via electronic mail, facsimile and overnight mail. Attached as Exhibit 2 to the Motion was a Notice of Hearing identifying September 17, 2013 as the deadline for objections to the

Motion (the "Objection Deadline"). A copy of the Notice of Hearing is attached hereto as Exhibit B.

No response or objection to the Motion was filed with the Court by the Objection Deadline. Accordingly, pursuant to Rule 9014-1(c) of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Eastern District of Michigan, the City respectfully requests that the Court enter a final order in the form attached as Exhibit 1 to the Motion and attached hereto as Exhibit C.

Dated: September 24, 2013

Respectfully submitted,

/s/ Heather Lennox

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Heather Lennox (OH 0059649)  
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ATTORNEYS FOR THE CITY

**EXHIBIT A**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

Chapter 9

City of Detroit, Michigan,

Case No. 13-53846

Debtor.

Hon. Steve W. Rhodes

**CERTIFICATE OF SERVICE**

I, Lydia Pastor Nino, certify and say that I am employed by Kurtzman Carson Consultants LLC (KCC), the proposed claims and noticing agent for the Debtor in the above-captioned case.

On September 3, 2013, at my direction and under my supervision, employees of KCC caused to be served the following documents via Email on the service list attached hereto as **Exhibit A**; and via First Class mail on the service list attached hereto as **Exhibit B**:

- **Statement of Debtor Regarding Notice of Proposed Fee Review Order** [Docket No. 705]
- **Motion of Debtor, Pursuant to Sections 105(a) and 107 of the Bankruptcy Code, for Entry of an Order (A) Authorizing and Directing City Officials to Release Certain Information Regarding Potential Tax Creditors and (B) Authorizing Filing of Such Information Under Seal** [Docket No. 706]

Dated: September 5, 2013

/s/ Lydia Pastor Nino  
Lydia Pastor Nino  
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# EXHIBIT A

**Exhibit A  
Served via Email**

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**Exhibit A  
Served via Email**

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**Exhibit A  
Served via Email**

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**Exhibit A  
Served via Email**

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**Exhibit A  
Served via Email**

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Union Representative	Sanitary, Chemists & Technicians Association	Attn: Saulius Simoliunas	simoliun@dwsd.org
Contract Counterparty	SBS Financial Products Company, LLC	Attn: John Carter	jcarter@sbsco.com
Counsel for Ambac Assurance Corporation	Schafer and Weiner PLLC	Brendan G Best	bbest@schaferandweiner.com
Counsel for Ambac Assurance Corporation	Schafer and Weiner PLLC	Daniel J Weiner	dweiner@schaferandweiner.com
Counsel for DEPFA Bank PLC	Schiff Hardin LLP	Rick L Frimmer & Matthew W Ott	rfrimmer@schiffhardin.com; mott@schiffhardin.com
Counsel for DEPFA Bank PLC	Schiff Hardin LLP	Suzanne L Wahl	swahl@schiffhardin.com
Attorney for Trustee	Schneider Miller PC	Kenneth M Schneider	kschneider@schneidermiller.com
Counsel for Schneiderman and Sherman PC	Schneiderman & Sherman PC	Brett A Border	bborder@ssplegal.com
Union Representative	SEIU Local 517M	Attn: Yolanda Langston	langstony@gmail.com
Union Representative	Senior Accountants, Analysts & Appraisers Association	Attn: Audrey Bellamy	ayoung586@comcast.net
Union Representative	Senior Water Systems Chemist Association	Attn: Andrew Ross	aross@dwsd.org
Fee Examiner	Shaw Fishman Glantz & Towbin LLC	Robert M Fishman Peter J Roberts Ira Bodenstein Gordon Gouveia David Doyle and Marc Reiser	proberts@shawfishman.com; rfishman@shawfishman.com; ibodenstein@shawfishman.com; ggouveia@shawfishman.com; ddoyle@shawfishman.com; mreiser@shawfishman.com
Counsel to National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn: Jeffrey Bjork, Esq. & Eric D. Tashman, Esq.	etashman@sidley.com; jbjork@sidley.com
Counsel to National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn: Guy S. Neal, Esq.	gneal@sidley.com
Counsel to National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn Guy S Neal	gneal@sidley.com
Counsel to National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn James F Bendernagel	jbendernagel@sidley.com
Counsel to National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn Jeffrey E Bjork	jbjork@sidley.com
Counsel to National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn Peter L Canzano	pcanzano@sidley.com
Counsel for Retired Detroit Police and Fire Fighters Association ("RDPFFA"); 2) Donald Taylor, President of RDPFFA; 3) Detroit Retired City Employees Association ("DRCEA"); and 4) Shirley V. Lightsey, President of DRCEA	Silverman & Morris PLLC	Thomas R Morris and Karin F. Avery	morris@silvermanmorris.com; avery@silvermanmorris.com
Counsel for Unisys Corporation	Sirlin Lesser & Benson PC	Dana S Plon	dplon@sirlinlaw.com
Counsel for Airgas USA LLC	Smith Katzenstein & Jenkins LLP	Kathleen M Miller	kmiller@skjlaw.com
State of Michigan Chief Legal Counsel	State of Michigan Chief Legal Counsel	Matthew Schneider	Schneiderm7@michigan.gov
State of Michigan Assistant Attorney General, Counsel to State of Michigan	State of Michigan Revenue & Collections Division	Steven B Flancher & Matther Schneider	flanchers@michigan.gov; schneiderm7@michigan.gov
The Office of the Treasurer for the State of Michigan	State Treasurer		MIStateTreasurer@michigan.gov
Counsel for Gabriel, Roeder, Smith & Company	Stevenson & Bullock PLC	Charles D Bullock & Elliot G Crowder	cbullock@sbplclaw.com; ecrowder@sbplclaw.com
Counsel to the Retired Detroit Police Members Association	Strobl & Sharp PC	Attn Lynn M Brimer	lbrimer@stroblpc.com
Counsel to the Retired Detroit Police Members Association	Strobl & Sharp PC	Attn Meredith E Taunt	mfield@stroblpc.com
Counsel to the Retired Detroit Police Members Association	Strobl & Sharp PC	Attn Meredith E Taunt	mtaunt@stroblpc.com
Union Representative	Teamsters Local #214	Attn: Joseph Valenti	TL214teams@ameritech.net
City's Secured & Unsecured Bonds	The Bank of New York Mellon Trust Company, National Association, as trustee	Attn: Eduardo Rodriguez	eduardo.rodriguez@bnymellon.com
Counsel for Kevin Lewis & Jeremy Morris	The Markowitz Law Office	Carolyn B Markowitz PC	bankruptcy@markowitzlegal.com
Counsel to Michigan Council 25 of the American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO	The Sanders Law Firm PC	Herbert A Sander	hsanders@miafscme.org
Counsel for Michigan Auto Recovery Service Inc	Thornbladh Legal Group PLLC	Kurt Thornbladh	kthornbladh@gmail.com
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water)	U.S. Bank National Association, as trustee, bond registrar transfer agent, paying agent, custodian and/or contract administrator	Attn: Susan T. Brown	susan.brown5@usbank.com

**Exhibit A  
Served via Email**

<b>Party Description</b>	<b>Company</b>	<b>Contact</b>	<b>Email</b>
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water)	U.S. Bank National Association, as trustee, bond registrar transfer agent, paying agent, custodian and/or contract administrator	Attn: Susan E. Jacobsen VP	susan.jacobsen2@usbank.com
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water Bonds)	U.S. Bank National Association, as trustee, for the Detroit Sewer and Water Bonds	Attn: Lawrence J. Bell	lawrence.bell@usbank.com
Union Representative	UAW - Local # 412	Attn: John Cunningham	jcunningham@uaw.net
Union Representative	UAW - Local #212	Attn: John Cunningham	jcunningham@uaw.net
Union Representative	UAW – PAA Local #2211	Attn: Robyn Brooks	BrooR@detroitmi.gov
Union Representative	UAW – WWTP Local #2200	Attn: Laurie Stuart	mimilaurie@yahoo.com; ltownse@detroitpubliclibrary.org
Union Representative	United Auto Workers Union	Attn: Michael Nicholson & Mike Dwyer	mdwyer@uaw.net
Counsel for United States of America	Unites States Attorney	Julia A. Caroff, Asssitant US Attorney	julia.caroff@usdoj.gov
Union Representative	Utility Workers Union of America	Attn: James Harrison	jharrison@uwua.net
Union Representative	Utility Workers Union of America Local #488	Attn: Carl Anderson	canderson@dwsd.org
Union Representative	Utility Workers Union of America Local #504	Attn: Curlisa Jones	mcqueen@dwsd.org
Union Representative	Utility Workers Union of America Local #531	Attn: Samuel Wilson	swilson@dwsd.org
Counsel for Center for Community Justice and Advocacy ("CCJA")	Vanessa G. Fluker, Esq., PLLC	Vanessa G Fluker	vgflawyer@sbcglobal.net
Interested Party	Vanguardians	Barry Allen	pra@vanguardians.org
Counsel to U.S. Bank National Association (Top 20 Creditor)	Waller Lansden Dortch & Davis LLP	Attn: David E. Lemke, Esq. & Courtney Rogers	david.lemke@wallerlaw.com; courtney.rogers@wallerlaw.com
Counsel to U.S. Bank National Association (Top 20 Creditor)	Waller Lansden Dortch & Davis LLP	Michael R Paslay Ryan K Cochran	Mike.Paslay@wallerlaw.com; Ryan.Cochran@wallerlaw.com
Counsel for UBS AG and Merrill Lynch Capital Services, Inc.	Warner Norcross & Judd LLP	Charles N Ash Jr	cash@wnj.com
Counsel for UBS AG and Merrill Lynch Capital Services Inc	Warner Norcross & Judd LLP	Stephen B Grow Douglas A Dozeman & Charles N Ash Jr	sgrow@wnj.com; ddozeman@wnj.com; cash@wnj.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Alfredo R Perez	alfredo.perez@weil.com
Counsel to Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Attn: Gary T. Holtzer, Esq. & Alfredo R. Pérez, Esq.	gary.holtzer@weil.com; alfredo.perez@weil.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Kelly DiBlasi	kelly.diblas@weil.com
Counsel for Robbie Flowers, Michael Wells, Janet Whitson, Mary Washington and Bruce Goldman	William A. Wertheimer		billwertheimer@gmail.com
Counsel for Financial Guaranty Insurance Company	Williams Williams Rattner & Plunkett PC	Ernest J Essad Jr & Mark R James	ejessad@wvrplaw.com; mrjames@wvrplaw.com
Counsel to Assured Guaranty Municipal Corporation	Winston & Strawn LLP	Attn: Lawrence A. Larose Samuel S. Kohn Carrie V. Hardman	llarose@winston.com; skohn@winston.com; chardman@winston.com
Counsel to Assured Guaranty Municipal Corporation	Winston & Strawn LLP	Sarah T. Foss	sfoss@winston.com
Counsel for The Bank of New York Mellon	Wolfson Bolton PLLC	Scott A Wolfson & Anthony J Kochis	swolfson@wolfsonbolton.com; akochis@wolfsonbolton.com
Interested Party	Ziulkowski & Associates, PLC	Janet M. Ziulkowski	ecf@zaplc.com

# EXHIBIT B

**Exhibit B**  
**Served via First Class Mail**

Party Description	Company	Contact	Address 1	Address 2	Address 3	City	State	Zip
Union Representative	AFSCME Local #0023	Attn: Robert Stokes	600 W. Lafayette, Ste. 134			Detroit	MI	48226
Union Representative	AFSCME Local #0312	Attn: Phillip Douglas	14022 Linwood			Detroit	MI	48238
Union Representative	AFSCME Local #1642	Attn: Gina Thompson-Mitchell	600 W. Lafayette, Ste. L – 123			Detroit	MI	48226
Retiree Representative	Detroit Firemen's Fund Association	Attn: Kim Fett	250 W. Larned Street, Suite 202			Detroit	MI	48226
Retiree Representative	Detroit Police Benefit and Protective Association	Attn: Delbert R. Jennings, Sr.	3031 W. Grand Boulevard, Suite 405			Detroit	MI	48202
Union Representative	Field Engineers Association	Attn Larry Hart	PO Box 252805			West Bloomfield	MI	48325
The Office of the Governor of the State of Michigan	Governor Rick Snyder		P.O. Box 30013			Lansing	MI	48909
Counsel for IBM Credit LLC	IBM Credit LLC	Andy Gravina	Special Handling Group MD NC317	6303 Barfield Rd NE		Atlanta	GA	30328
Office of the United States Trustee	Office of the United States Trustee	Daniel McDermott	211 West Fort Street Suite 700			Detroit	MI	48226
The City, c/o the Emergency Manager	The City of Detroit	Attn: Kevyn D. Orr, Emergency Manager	Coleman A. Young Municipal Center	2 Woodward Ave Suite 1126		Detroit	MI	48226
Corporation Counsel for the City of Detroit	The City of Detroit	Attn: Corporation Counsel	Coleman A. Young Municipal Center	2 Woodward Avenue	Fifth Floor	Detroit	MI	48226

**EXHIBIT B**

**UNITED STATES BANKRUPTCY COURT  
Eastern District of Michigan**

**In re:**

**CITY OF DETROIT, MICHIGAN,**

**Debtor.**

**Chapter: 9**

**Case No.: 13-53846**

**Judge: Hon. Steven W. Rhodes**

Address: 2 Woodward Avenue, Suite 1126  
Detroit, Michigan 48226

Last four digits of Social Security or  
Employer's Tax Identification (EIN) No(s).(if any): 38-6004606

**NOTICE OF MOTION OF DEBTOR, PURSUANT TO SECTIONS 105(A) AND 107 OF THE  
BANKRUPTCY CODE, FOR ENTRY OF AN ORDER (A) AUTHORIZING AND DIRECTING  
CITY OFFICIALS TO RELEASE CERTAIN INFORMATION REGARDING POTENTIAL TAX  
CREDITORS AND (B) AUTHORIZING THE FILING OF SUCH INFORMATION UNDER SEAL**

The City of Detroit, Michigan (the "City") has filed papers with the Court seeking entry of an order, pursuant to sections 105(a) and 107 of the Bankruptcy Code: (a) authorizing and directing applicable officials of the City to release certain information regarding potential tax creditors to the City's advisors and certain other entities for use in the preparation of documents required to be filed by the Bankruptcy Code and for other required purposes in this chapter 9 case; and (b) authorizing the City to file such information under seal.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, **on or by September 17, 2013**, you or your attorney must:

1. File with the court a written response or an answer, explaining your position at:<sup>1</sup>

**United States Bankruptcy Court**  
United States Bankruptcy Court  
211 W. Fort Street, Suite 2100  
Detroit, Michigan 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

<sup>1</sup> Any response or answer must comply with F. R. Civ. P. 8(b), (c) and (e).



You must also mail a copy to:

David G. Heiman (OH 0038271)  
Heather Lennox (OH 0059649)  
JONES DAY  
North Point  
901 Lakeside Avenue  
Cleveland, Ohio 44114  
Telephone: (216) 586-3939  
Facsimile: (216) 579-0212

Bruce Bennett (CA 105430)  
JONES DAY  
555 South Flower Street  
Fiftieth Floor  
Los Angeles, California 90071  
Telephone: (213) 243-2382  
Facsimile: (213) 243-2539

Jonathan S. Green (MI P33140)  
Stephen S. LaPlante (MI P48063)  
MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.  
150 West Jefferson  
Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 963-6420  
Facsimile: (313) 496-7500

2. If a response or answer is timely filed and served, the Court will schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing. The City has requested that the Court schedule a hearing date of October 2, 2013 at 10:00 a.m., Eastern Time with respect to the motion.

**If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.**

Dated: September 3, 2013

Respectfully submitted,

/s/ Heather Lennox

David G. Heiman (OH 0038271)

Heather Lennox (OH 0059649)

JONES DAY

North Point

901 Lakeside Avenue

Cleveland, Ohio 44114

Telephone: (216) 586-3939

Facsimile: (216) 579-0212

dgheiman@jonesday.com

hlennox@jonesday.com

Bruce Bennett (CA 105430)

JONES DAY

555 South Flower Street

Fiftieth Floor

Los Angeles, California 90071

Telephone: (213) 243-2382

Facsimile: (213) 243-2539

bbennett@jonesday.com

Jonathan S. Green (MI P33140)

Stephen S. LaPlante (MI P48063)

MILLER, CANFIELD, PADDOCK AND

STONE, P.L.C.

150 West Jefferson

Suite 2500

Detroit, Michigan 48226

Telephone: (313) 963-6420

Facsimile: (313) 496-7500

green@millercanfield.com

laplante@millercanfield.com

ATTORNEYS FOR THE CITY

**EXHIBIT C**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

-----X  
In re : Chapter 9  
CITY OF DETROIT, MICHIGAN, : Case No. 13-53846  
Debtor. : Hon. Steven W. Rhodes  
-----X

**ORDER, PURSUANT TO SECTIONS 105(a) AND 107 OF THE  
BANKRUPTCY CODE, (A) AUTHORIZING AND DIRECTING  
CITY OFFICIALS TO RELEASE CERTAIN INFORMATION  
REGARDING POTENTIAL TAX CREDITORS AND  
(B) AUTHORIZING FILING OF SUCH INFORMATION UNDER SEAL**

This matter coming before the Court on the Motion of Debtor,  
Pursuant to Sections 105(a) and 107 of the Bankruptcy Code, for Entry of an Order  
(A) Authorizing and Directing City Officials to Release Certain Information  
Regarding Potential Tax Creditors and (B) Authorizing the Filing of Such  
Information Under Seal (the "Motion"),<sup>1</sup> filed by the City of Detroit, Michigan  
(the "City"); the Court having reviewed the Motion and having considered the  
statements of counsel and the evidence adduced with respect to the Motion at a  
hearing before the Court (the "Hearing"); the Court finding that: (a) the Court has

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b); (c) notice of the Motion and the Hearing was sufficient under the circumstances; (d) all of the relief requested in the Motion is necessary and appropriate to carry out the provisions of the Bankruptcy Code and in the best interests of the City, its creditors and other parties in interest; and (e) cause exists justifying the filing of the Creditor Information under seal; and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The City Officials are hereby authorized and directed to provide the Creditor Information, as requested, to the EM Staff, the City Advisors and the Claims Agent, pursuant to section 105(a) of the Bankruptcy Code.
3. The EM Staff, the City Advisors and the Claims Agent, as applicable, shall hold any Creditor Information in confidence subject to the terms of this Order. Notwithstanding the foregoing, the EM Staff, the City Advisors and the Claims Agent shall not be required to execute any confidentiality agreement or fulfill any other requirement to obtain access to the Creditor Information.
4. This Order constitutes a "proper judicial order" within the meaning of M.C.L. § 141.674 and Detroit City Code § 18-10-16.

5. The City is hereby authorized to file the portion of the List of Creditors and Claims containing the Creditor Information, or any other document containing the Creditor Information, under seal pursuant to sections 105(a), 107(b)(1) and 107(c)(1) of the Bankruptcy Code.