

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT

In the Matter of:

CITY OF DETROIT, MICHIGAN,  
  
Debtor.

Chapter 9  
Case No. 13-53846-swr  
Hon. Steven W. Rhodes

**MOTION AND INCORPORATED MEMORANDUM OF LAW BY PARTY-IN-INTEREST  
THOMAS GERALD MOORE FOR RELIEF FROM THE AUTOMATIC STAY TO ALLOW  
CIVIL LITIGATION TO PROCEED FOR DISCOVERY PURPOSES AND/OR TO RECOVER  
ANY INSURANCE COVERAGE UNDER DEFENDANTS' HOMEOWNERS  
INSURANCE POLICIES**

NOW COMES Thomas Gerald Moore, (“Moore”), by and through counsel, Jay S. Kalish, and for his Motion For Relief from the Automatic Stay to Allow Civil Litigation to Proceed for Discovery Purposes and/or To Recover Any Insurance Coverage under the Defendants’ Homeowners Insurance Policies, and says as follows:

1. Moore is the Plaintiff in a civil action filed on January 2, 2103 in the United States District Court for the Eastern District of Michigan in Detroit assigned case number 2:13-cv-10010-SFC-LJM and styled as *Thomas Gerald Moore vs. Matthew Fulgenzi and Brian Headapohl*,. (the “Lawsuit”).
2. Defendants Matthew Fulgenzi (“Fulgenzi”), and Brian Headapohl (“Headapohl”), are City of Detroit Police Officers.
3. The City of Detroit is not a named Defendant in the Lawsuit.
4. The Lawsuit asks for money damages against Fulgenzi and Headapohl in their individual capacity for the reason that at the time of the alleged conduct, they were off duty but acting under color of law.
5. On January 16, 2013, the City of Detroit, through its Law Department, filed an Answer, Affirmative Defenses and a Jury Demand on behalf of Fulgenzi and Headapohl.

6. On March 6, 2013, Moore filed his First Amended Complaint.
7. On March 7, 2013, the City of Detroit, through its Law Department, filed an Answer, Affirmative Defenses and Reliance on Jury Demand on behalf of Fulgenzi and Headapohl.
8. Through discovery, Plaintiff has determined that the Defendants, Fulgenzi and Headapohl are possessed of homeowner's insurance policies issued by AAA and Farmers Insurance, respectively, which were in force and continue to be in force and which may cover the claims advanced in Moore's Lawsuit as well as providing payment for the costs of defense.
9. On July 18, 2013, the City of Detroit filed a petition for relief under Chapter 9 of the United States Bankruptcy Code.
10. On July 25, 2013, at Docket #166, this Court entered its Order Pursuant to Section 105(a) of the Bankruptcy Code Extending the Chapter 9 Stay to Certain (A) State Entities, (B) Non-Officer Employees and (C) Agents and Representatives of the Debtor, (the "Extended Stay Order").
11. Accordingly, the Lawsuit has been stayed and has been removed from District Court's active docket.
12. Defendants Fulgenzi and Headapohl are "Insured Persons" as that term is defined in their respective homeowner's insurance policies.
13. Plaintiff seeks an Order from this Court granting relief from the automatic stay provided in 11 USC § 362 and the Extended Stay Order to Allow the Lawsuit to proceed for discovery purposes and/or to recover any insurance coverage under the defendants' homeowners insurance policies,.
14. In support of his Motion, Moore states as follows:
  - a. As the legislative history of §362 shows "it will often be more appropriate to permit proceedings to continue in their place of origin, when no great prejudice to the bankruptcy estate would result, in order to leave the parties to their *chosen forum and to relieve the bankruptcy court from any*

*duties that may be handled elsewhere.” In re Lamberjack*, 149 B.R. 467, 470 (Bankr. N.D. Ohio 1992) (citing Senate Report No., 989, 95<sup>th</sup> Cong., 2d Sess., 50)(emphasis added).

b. Section 362(d) of the Bankruptcy Code provides that a party may be entitled to relief from the automatic stay under certain circumstances. 11 U.S.C. § 362(d); *In re Éclair Bakery Ltd.*, 255 B.R. 121, 132 (Bankr. S.D.N.Y. 2000). Specifically, relief from the stay will be granted only where the party seeking relief demonstrates “cause:” §362(d)

On request of a party in interest and after notice and a hearing, the court shall grant relief from the stay provided under subsection (a) of this section, such as by terminating, annulling, modifying, or conditioning such stay –

(1) for cause, including the lack of adequate protection of an interest in property of such party in interest; 11 U.S.C. § 362(d)(1).

The statute does not define what constitutes “cause,” however, many courts have determined that in examining whether cause exists they “must consider particular circumstances of the case and ascertain what is just to the claimants, the debtor, and the estate.” *In re Mego Int’l, Inc.*, 28 B.R. 324, 326 (Bankr. S.D.N.Y. 1983).

In determining what is just to all parties in interest with respect to lifting the automatic stay, Courts generally follow the decision of *In re Sonmax Industries, Inc.*, 907 F.2d 1280 (2d Cir. 1990). *See, e.g., Mazzeo v. Lenhart (In re Mazzeo)*, 167 F.3d 139, 143 (2d Cir. 1999) (vacating a district court order granting stay relief where the bankruptcy court had not applied the *Sonmax* factors, made only sparse factual findings and ultimately did not provide the appellate court “with sufficient information to determine what facts and circumstances specific to the present case the court believed made relief from the automatic stay appropriate.”). In *Sonmax*, the court outlined twelve factors to be considered when deciding whether to lift the automatic stay:

- (1) whether relief would result in a partial or complete resolution of the issues;
- (2) lack of any connection with or interference with the bankruptcy case;
- (3) whether the other proceeding involves the debtor as a fiduciary;
- (4) whether a specialized tribunal with the necessary expertise has been established to hear the cause of action;
- (5) whether the debtor’s insurer has assumed full responsibility for defending it;
- (6) whether the action primarily involves third parties;

- (7) whether litigation in another forum would prejudice the interests of other creditors;
- (8) whether the judgment claim arising from the other action is subject to equitable subordination;
- (9) whether movant's success in the other proceeding would result in a judicial lien avoidable by the debtor;
- (10) the interests of judicial economy and the expeditious and economical resolution of litigation;
- (11) whether the parties are ready for trial in the other proceeding; and
- (12) impact of the stay on the parties and the balance of harms.

*Sonnax*, 907 F.2d at 1286.

Only those factors relevant to a particular case need be considered and the court need not assign them equal weight. *In re Touloumis*, 170 B.R. 825, 828 (Bankr. S.D.N.Y. 1994).

In this case, because the Lawsuit seeks no relief from the Debtor, and the Debtor is neither a party to the Lawsuit or a fiduciary, and the relief sought herein is limited to the availability of the Defendants' insurance coverage, an analysis of all of the *Sonnax* factors must lead to the conclusion that relief from the automatic stay will not impact the Debtor's bankruptcy case in any way.

c. In determining as to whether "cause" exists, most Courts "balance the hardship to the creditor, if they are not allowed to proceed with their lawsuit, against potential prejudice to the Debtor, Debtor's estate and other creditors." *In re R. J. Groover Constr., LLC*, 411 B.R. 460, 463-64 (Bankr. N.D. Ga. 2008).

d. In this case, Defendants Fulgenzi and Headapohl are not debtors in a bankruptcy proceeding; their homeowners insurance policies and any payment from those insurance companies are not property of the bankruptcy estate, and, arguably, the insurance policies should cover the costs of defending the Lawsuit.

15. That the above mentioned facts and law constitute cause for termination of the automatic stay pursuant to 11 USC § 362(d)(1).

16. Pursuant to LBR 4001-1(a) (E.D.M.), notice of this motion has been provided to the Debtor, Debtor's Counsel, Counsel for Fulgenzi and Headapohl and the Office of the U.S. Trustee.

17. Good cause exists for waiving the ten (10) day stay provision of Rule 4001(a)(3) Fed. Rules of Bankruptcy Procedure.

18. That pursuant to L.B.R. 9014-1(b)(4) (E.D.M.), attached is a copy of the proposed Order Terminating the Automatic Stay as to Moore labeled as Exhibit "A".

WHEREFORE, Movant respectfully pray that this Court enter an Order Terminating the Automatic Stay as to Thomas Gerald Moore to Allow Civil Litigation to Proceed for Discovery Purposes and/or To Recover Any Insurance Coverage under the Defendants' Homeowners Insurance Policies and for such additional relief as the Court deems just and equitable.

Respectfully Submitted,

JAY S. KALISH & ASSOCIATES, P.C.

/s/ Jay S. Kalish

JAY S. KALISH

Attorney for Thomas Gerald Moore  
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Mich Bar No. P26301

Dated: September 26, 2013

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT

In the Matter of:

CITY OF DETROIT, MICHIGAN,  
  
Debtor.

Chapter 9  
Case No. 13-53846-swr  
Hon. Steven W. Rhodes

**ORDER GRANTING MOTION BY PARTY-IN-INTEREST THOMAS GERALD MOORE FOR RELIEF FROM THE AUTOMATIC STAY TO ALLOW CIVIL LITIGATION TO PROCEED FOR DISCOVERY PURPOSES AND/OR TO RECOVER ANY INSURANCE COVERAGE UNDER DEFENDANTS' HOMEOWNERS INSURANCE POLICIES**

This matter having come before the Court on the Motion of Thomas Gerald Moore For Relief from the Automatic Stay to Allow Civil Litigation to Proceed for Discovery Purposes and/or To Recover Any Insurance Coverage under the Defendants' Homeowners Insurance Policies (the "Motion"), and Notice of the Motion having been provided to all parties entitled to notice and no response having been filed in the matter set forth in Notices of the Motion and the Court having reviewed the Motion pursuant to 11 USC §§ 362(d), 541(a), and 105(a) and Fed. R. Bankr. P. 4001(a) and 9014 and the Court being duly advised in the premises:

IT IS ORDERED that the Motion is granted.

IT IS FURTHER ORDERED that the stay imposed by 11 USC §362 and the Extended Stay Order as that term is defined in the Motion is terminated to allow the Lawsuit referenced in the Motion to proceed for discovery purposes and/or to recover any insurance coverage under the defendants' homeowners insurance policies.

Exhibit 1

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT

In the Matter of:

CITY OF DETROIT, MICHIGAN,  
  
Debtor.

Chapter 9  
Case No. 13-53846-swr  
Hon. Steven W. Rhodes

**NOTICE OF MOTION BY PARTY-IN-INTEREST THOMAS GERALD MOORE FOR RELIEF  
FROM THE AUTOMATIC STAY TO ALLOW CIVIL LITIGATION TO PROCEED FOR  
DISCOVERY PURPOSES AND/OR TO RECOVER ANY INSURANCE COVERAGE UNDER  
DEFENDANTS' HOMEOWNERS INSURANCE POLICIES**

Thomas Gerald Moore has filed a Motion For Relief from the Automatic Stay to Allow Civil Litigation to Proceed for Discovery Purposes and/or To Recover Any Insurance Coverage under the Defendants' Homeowners Insurance Policies,

**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 Motion For Relief from the Automatic Stay to Allow Civil Litigation to Proceed for Discovery Purposes and/or To Recover Any Insurance Coverage under the Defendants' Homeowners Insurance Policies, or if you want the Court to consider your views on the motion, within 14 days, 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, 211 W. Fort Street, Suite 1700, Detroit, MI 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.

You must also mail a copy to:

Jay S. Kalish, Esq., 28592 Orchard Lake Road, Suite 360, Farmington Hills, MI 48334.

Office of the United States Trustee, 211 West Fort Street, Suite 700, Detroit, MI 48226.

Jonathan S. Green, Attorney for Debtor, 150 W. Jefferson Ave., Ste 2500, Detroit, MI 48226

2. If a response or answer is timely filed and served, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing.

**Exhibit 2**

**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 and may enter an order granting that relief.**

JAY S. KALISH & ASSOCIATES, P.C.

*/s/ Jay S. Kalish*\_\_\_\_\_.

JAY S. KALISH

Attorney for Prime Financial, Inc.

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Farmington Hills, MI 48334

(248) 932-3000

*JSKalish@aol.com*

MI Bar Number: P26301

Dated: September 26, 2013



UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT

In the Matter of:

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Chapter 9  
Case No. 13-53846-swr  
Hon. Steven W. Rhodes

**CERTIFICATE OF SERVICE**

Jay S. Kalish hereby states that he is the attorney for Thomas Gerald Moore and that on September 26, 2013, he filed his Motion For Relief from the Automatic Stay to Allow Civil Litigation to Proceed for Discovery Purposes and/or To Recover Any Insurance Coverage under the Defendants' Homeowners Insurance Policies, and Notice of the Motion using the Court's CM/ECF system which will provide notice of the Motion to all parties entitled to notice.

He further states that he served all parties on the attached mailing list via 1<sup>st</sup> class mail with postage prepaid from a mailbox in Farmington Hills, Michigan.

JAY S. KALISH & ASSOCIATES, P.C.

/s/ Jay S. Kalish

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(248) 932-3000  
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MI Bar Number: P26301

Dated: September 26, 2013

**Exhibit 4**

Label Matrix for local noticing  
0645-2  
Case 13-53846-swr  
Eastern District of Michigan  
Detroit  
Thu Sep 26 12:30:48 EDT 2013  
Bishop Real Estate, L.L.C.  
c/o Stephen M. Gross, Esq.  
39533 Woodward Ave.  
Suite 318  
Bloomfield Hills, MI 48304-5106

City of Detroit, Michigan  
2 Woodward Avenue  
Suite 1126  
Detroit, MI 48226-3443

Eaton Vance Management  
William Delahunty  
2 International Place  
Boston, MA 02110-4101

Financial Guaranty Insurance Company  
125 Park Avenue  
New York, NY 10017-5664

HP Enterprise Services, LLC  
c/o Michael D. Warner, Esq.  
Cole, Schotz, Meisel, Forman & Leonard  
301 Commerce Street, Ste 1700  
Fort Worth, TX 76102-4126

International Union, United Automobile, Aero  
Solidarity House  
8000 East Jefferson Avenue  
Detroit, MI 48214-3963

Michigan Auto Recovery Service, Inc.  
8850 Southfield  
Detroit, MI 48228-1976

Resnick & Moss, P.C.  
40900 Woodward Avenue  
Suite 111  
Bloomfield Hills, MI 48304-5116

State of Michigan  
PO Box 30754  
Lansing, MI 48909-8254

36th District Court for the State of Michigan  
c/o John T. Gregg, Esq.  
Barnes & Thornburg LLP  
171 Monroe Avenue, NW  
Suite 1000  
Grand Rapids, MI 49503-2694

Chase Paymentech, LLC  
Attn: Lazonia Clark, Business Analyst  
14221 Dallas Pkwy, Bldg II  
Dallas, TX 75254-2942

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c/o Schiff Hardin LLP  
Rick L. Frimmer, Esq.  
233 S. Wacker Dr., Ste. 6600  
Chicago, IL 60606-6360

Erste Europäische Pfandbrief- und Kommunalkr  
c/o Matthew G. Summers, Esquire  
Ballard Spahr LLP  
919 N. Market St., 11th Floor  
Wilmington, DE 19801-3062

Gabriel, Roeder, Smith & Company  
c/o Stevenson & Bullock, P.L.C.  
Attn: Charles D. Bullock  
26100 American Drive  
Suite 500  
Southfield, MI 48034-6184

IBM Corporation  
ATTN: National Bankruptcy Coordinator  
IBM Corporation  
275 Viger East, Suite 400  
Montreal, Quebec H2X 3R7  
CANADA

Mario's Restaurant, Inc.  
4222 Second  
Detroit, MI 48201-1706

New England Fertilizer Company

Retired Detroit Police Members Association  
c/o Strobl & Sharp, P.C.  
300 E. Long Lake Road, Suite 200  
Bloomfield Hills, MI 48304-2376

State of Michigan, Department of Attorney Ge  
c/o Dawn R. Copley  
Dickinson Wright PLLC  
500 Woodward Avenue, Suite 4000  
Detroit, MI 48226-5403

Amalgamated Transit Union Local 26  
716 Lothrop Ave.  
Detroit, MI 48202-2715

City of Detroit Water and Sewerage Departmen  
615 Griswold  
Suite 1708  
Detroit, MI 48226-3990

Detroit Retired City Employees Association  
P.O. Box 40713  
Detroit, MI 48240-0713

Fidelity Management & Research Company  
Hannah Kate Sullivan  
One Spartan Way  
Mail Zone TS2T  
Merrimack, NH 03054-4300

Godfrey & Kahn, S.C.  
One East Main Street, Suite 500  
P.O. Box 2719  
Madison, WI 53701-2719

International Outdoor, Inc.  
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Farmington Hills, MI 48334-2971

McAlpine PC  
3201 University Dr., Suite 100  
Auburn Hills, MI 48326-2396

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Detroit, MI 48226

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Retired Detroit Police and Fire Fighters  
2525 E. 14 Mile Rd  
Sterling Heights, MI 48310-5969

The Chair of Saint Peter  
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Washington, DC 20004-3002

Treasurer, City of Detroit  
c/o Law Department  
2 Woodward Ave.  
Suite 500  
Detroit, MI 48226-3440

Upright Wrecking & Demolition, L.L.C.  
5555 Connor Ave. Suite 1249  
Detroit, MI 48213-3495

Waste Management Inc. etal  
c/o Jerry M. Ellis  
39395 W. Twelve Mile Road  
Suite 200  
Farmington Hills, MI 48331-2968

ATTN: National Bankruptcy Coordinator  
IBM Corporation  
275 Viger East, Suite 400  
Montreal, Quebec H2X 3R7  
CANADA

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Suite 100  
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Royal Oak, MI 48067-5401

FedEx Tech Connect Inc as Assignee  
of FedEx Express/Ground/Freight/Office  
3965 Airways Blvd, Module G, 3rd Floor  
Memphis, Tennessee 38116-5017

Fidelity Management & Research Company  
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Heidi Peterson c/o Charles Idelsohn, Attorne  
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CENTRALIZED INSOLVENCY OPERATIONS  
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Xerox Corporation c/o  
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Phebe Lee Woodberry  
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Detroit, MI 48221-2229

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Detroit, MI 48202-1528

Raleigh Chambers  
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Detroit, MI 48227-1413

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Detroit, MI 48202-2128

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Shirley V Lightsey  
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Detroit, MI 48240-0713

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President-Detroit Retired City Emp As  
P.O. Box 40713  
Detroit, MI 48240-0713

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Timothy King  
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Detroit, MI 48238-2632



Tracey Renee Tresvant  
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Ulysses Freeman  
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Valerie Glenn-Simons  
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Detroit, MI 48211-2065

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Detroit, MI 48228-2591

William Hickey  
14910 Lamphere St.  
Detroit, MI 48223-1875

William Curtis Walton  
4269 Glendale  
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Detroit, MI 48212-1082

Woodrow Garrett  
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Detroit, MI 48207-3855

Xylia Hall  
3500 Parker  
Detroit, MI 48214-1893

Zelma Kinchloe  
439 Henry St  
Detroit, MI 48201-2609

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

INTERNAL REVENUE SERVICE  
SB/SE  
P O BOX 330500 STOP 15  
DETROIT MI 48232

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Ad Hoc COPs Holders

(u)Ambac Assurance Corporation

(u)Assured Guaranty Municipal Corp.

(u)Bankruptcy Estate of Simeon Chisara Ohakpo

(u)Berkshire Hathaway Assurance Corporation

(u)BlackRock Financial Management, Inc.

(u)Blue Cross Blue Shield of Michigan and Blu

(u)Center for Community Justice and Advocacy

(u)Courtesy Notice

(u)Detroit Branch NAACP	(u)Detroit Fire Fighters Association, I.A.F.F	(u)Detroit Institute of Arts
(u)Detroit Police Command Officers Associatio	(u)Detroit Police Lieutenants and Sergeants A	(u)Detroit Police Officers Association
(u)Deutsche Bank Securities Inc.	(u)Dexia Credit Local	(u)Dexia Holdings, Inc.
(u)Downtown Development Authority	(u)Enjoi Transportation, LLC	(u)General Motors LLC
(u)General Retirement System of the City of D	(u)Genuine Parts Company	(u)Greektown Casino, LLC
(u)HRT Enterprises	(u)Health Alliance Plan of Michigan	(u)Hercules & Hercules, Inc. 19055 W. Davidson Detroit
(u)IBM Credit LLC	(u)International Business Machines Credit LLC	(u)International Union of Operating Engineers
(u)John W. and Vivian M. Denis Trust	(u)Maddin Hauser Wartell Roth & Heller, PC	(u)Meijer, Inc.
(u)Merrill Lynch Capital Services, Inc.	(u)Michigan Bell Telephone Company d/b/a AT&T	(u)Michigan Council 25 Of The American Federa
(du)Michigan Council 25 of the American Feder	(u)Michigan Property Tax Relief, LLC	(u)Michigan State Conference NAACP

(u)National Public Finance Guarantee Corporat	(u)Nuveen Asset Management	(u)Official Committee of Retirees
(u)P.P.T.A., Inc., or Harold Hoyt	(u)Schneiderman and Sherman, P.C.	(u)Service Employees International Union, Loc
(u)St. Martins Cooperative	(u)Syncora Capital Assurance Inc.	(u)Syncora Guarantee Inc.
(u)Syncora Holdings Ltd.	(u)T&T Management, Inc. , FL	(u)T-Mobile USA, Inc.
(u)The Bank Of New York Mellon	(u)U.S. Bank N.A.	(u)U.S. Bank National Association
(u)UBS AG	(u)US Health & Life Insurance Company	(u)United States Nuclear Regulatory Commissio
(u)United States of America	(u)Wade Trim Associates, Inc.	(u)Xerox Corporation
(d)36th District Court for the State of Michi c/o John T. Gregg, Esq. Barnes & Thornburg LLP 171 Monroe Avenue, NW, Suite 1000 Grand Rapids, MI 49503-2694	(u)Brown Rehabilitation Management, Inc. 29688 Telegraph Suite 100 Southfield48034	(d)Chase Paymentech, LLC Attn: Lazonia Clark, Business Analyst 14221 Dallas Pkwy, Bldg II Dallas, TX 75254-2942
(u)Citizens United Against Corrupt Government	(d)Eaton Vance Management William Delahunty 2 International Place Boston, MA 02110-4101	(d)International Outdoor, Inc. 28423 Orchard Lake Rd., Ste. 200 Farmington Hills, MI 48334-2971
(d)Iron Mountain Information Management, LLC 745 Atlantic Avenue Boston, MA 02111-2735	(d)Michigan Auto Recovery Service, Inc. 8850 Southfield Detroit MI 48228-1976	(u)Michigan Community Action Agency Associati

(du)Michigan Council 25 of the American Feder

(u)Cecily R. McClellan

(u)Daniel M. McDermott

(u)Devery Jones

(u)Donald Glass

(u)Donnell White

(u)Gary Segatti

(u)Gerald Rosen

(u)Heidi Peterson

(u)James Herbert

(u)John Denis

(u)Johnathan Aaron Brown

(u)Johnnie R. Carr  
11310 Mansfield

(u)Judith West

(u)Karl E. Shaw

(u)Keetha R. Kittrell  
22431 Tireman

(u)Lou Ann Pelletier

(u)Mary Washington

(u)Mary Whitson

(u)Maureen Taylor

(u)Michael Wells

(u)Michael J. Abbott

(u)Mignon Lott

(d)Nathaniel Brent  
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Detroit, MI 48209-3031

(d)Patricia Ramirez  
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Ecorse, MI 48229-1075

(u)Rashida Tlaib

(u)Ronald Cook

(u)Shirley Tollivel

(u)Sylvester Davis

(d)Sylvia Jean Brown Jones  
218 Elmshaven Drive  
Lansing, MI 48917-3511

(u)Thomas Stallworth III

(u)Vera Cleo Magee

End of Label Matrix	
Mailable recipients	220
Bypassed recipients	101
Total	321