

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

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: :  
In re : Chapter 9  
: :  
CITY OF DETROIT, MICHIGAN, : Case No. 13-53846  
: :  
Debtor. : Hon. Steven W. Rhodes  
: :  
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**DEBTOR'S OBJECTION TO MICHIGAN  
COUNCIL 25 OF THE AMERICAN FEDERATION OF  
STATE, COUNTY AND MUNICIPAL EMPLOYEES, AFL-CIO,  
MOTION FOR ENTRY OF AN ORDER MODIFYING THE  
AUTOMATIC STAY SOLELY TO ALLOW ADMINISTRATIVE  
LAW JUDGE TO EXECUTE HIS OPINION AND LIQUIDATE  
DAMAGE AWARD BEFORE HE RETIRES ON OCTOBER 4, 2013**

The City of Detroit (the "City") hereby objects to the Michigan Council 25 of the American Federation of State, County and Municipal Employees, AFL-CIO, Motion for Entry of an Order Modifying the Automatic Stay Solely to Allow Administrative Law Judge to Execute His Opinion and Liquidate Damage Award Before He Retires on October 4, 2013 (Docket No. 1006) (the "Stay Relief Motion") filed by the Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO ("AFSCME"). In support of this Objection, the City incorporates in their entirety the arguments set forth in the Brief in Opposition to Michigan Council 25 of the

American Federation of State, County and Municipal Employees, AFL-CIO,  
Motion for Entry of an Order Modifying the Automatic Stay Solely to Allow  
Administrative Law Judge to Execute His Opinion and Liquidate Damage Award  
Before He Retires on October 4, 2013 filed contemporaneously herewith  
(the "Brief in Opposition") and respectfully represents as follows:

### **Objection**

For all of the reasons set forth in the Brief in Opposition, the relief requested by AFSCME may have far-reaching consequences on the administration of this chapter 9 case and the City's efforts to restructure. As such, cause does not exist warranting relief from the automatic stay, and the Stay Relief Motion should be denied.

WHEREFORE, for the reasons set forth herein and in the Brief in Opposition, the City respectfully requests that this Court: (a) deny the Stay Relief Motion; and (b) grant such other and further relief to the City as the Court may deem proper.

Dated: October 1, 2013

Respectfully submitted,

/s/ Heather Lennox

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