

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

CITY OF DETROIT, MICHIGAN

Case No. 13-53846-SWR

Chapter 9

Hon. Steven W. Rhodes

Debtor.

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**STIPULATION FOR ENTRY OF PROTECTIVE ORDER**

The State of Michigan, International Union, UAW, the Flowers Plaintiffs, The Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees, and the Retired Detroit Police Members Association, stipulate to entry of the attached Protective Order, resolving the State of Michigan Motion for Protective Order Pursuant to Federal Rule of Civil Procedure 26(c)(1)(D) (the "Motion") [Dkt #1094].

Dated: October 7, 2013

<p>STATE OF MICHIGAN</p> <p>By: <u>    /s/ Steven G. Howell    </u> Steven G. Howell Special Assistant Attorney General Dickinson Wright PLLC 500 Woodward Avenue, Suite 4000 Detroit, MI 48226 <a href="mailto:showell@dickinsonwright.com">showell@dickinsonwright.com</a></p>	<p>LOWENSTEIN SANDLER LLP</p> <p>By: <u>    /s/ Sharon L. Levine    </u> Sharon L. Levine Attorneys for Michigan Council 25 of the American Federation of State, County &amp; Municipal Employees, AFL-CIO 65 Livingston Avenue Roseland, NJ 07068-1791 <a href="mailto:slevine@lowenstein.com">slevine@lowenstein.com</a></p>
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<p>INTERNATIONAL UNION, UAW</p> <p>By: <u>    /s/ Michael Nicholson    </u>  Michael Nicholson  General Counsel - International Union, UAW  Solidarity House - 8000 East Jefferson Avenue  Detroit, Michigan 48214  <a href="mailto:mnicholson@uaw.net">mnicholson@uaw.net</a></p>	<p>LAW OFFICES OF WILLIAM A WERTHEIMER</p> <p>By: <u>          /s/ Willaim A. Wertheimer, Jr.          </u>  William A. Wertheimer, Jr.  Attorneys for Flowers Plaintiffs  30515 Timberbrook Lane  Bingham Farms, MI 48025  <a href="mailto:billwertheimer@gmail.com">billwertheimer@gmail.com</a></p>
<p>STROBL &amp; SHARP PC</p> <p>By: <u>    /s/ Lynn M. Brimer    </u>  Lynn M. Brimer  Attorneys for Retired Detroit Police Members  Association  300 East Long Lake Road, Suite 111  Bloomfield Hills, MI 48304  <a href="mailto:lbrimer@stroblpc.com">lbrimer@stroblpc.com</a></p>	

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**PROTECTIVE ORDER**

This matter comes before the Court upon the State of Michigan Motion for Protective Order Pursuant to Federal Rule of Civil Procedure 26(c)(1)(D) (the "Motion")[Dkt #1094]; and the Court being fully advised in the premises:

IT IS ORDERED that:

1. The Motion is GRANTED only to the extent set forth herein.
2. The names of non-selected candidates for the position of emergency manager of the City of Detroit may be redacted from any responsive documents that are produced by the State Deponents (as defined in the Motion) pursuant to the discovery requests of International Union, UAW and the Flowers Plaintiffs, but no responsive documents shall be withheld from production on the basis that they contain such names.
3. The parties participating in the depositions of the State Deponents may not ask the State deponents to identify the names of such non-selected candidates absent a separate order from this Court.
4. International Union, UAW, the Flowers Plaintiffs and the other parties that participate in the deposition of the State Deponents (including the Rule 30(b)(6) deposition of the State of Michigan scheduled for October 14, 2013) may seek an order from this Court, for cause,

seeking the information permitted to be redacted and not to be inquired into pursuant to this Order, including an order that may permit such non-selected candidates to be contacted by the deposing parties for interview as potential eligibility trial witnesses. The State of Michigan reserves the right to oppose entry of such order.