

1. Rule 7.1(d)(3)(A), which applies to this case pursuant to Bankruptcy Court for the Eastern District of Michigan Local Rule 9029-1(a), states that briefs supporting a response, including footnotes and signatures, may not exceed twenty-five (25) pages, but that a party seeking to file a longer brief may apply *ex parte* in writing setting forth the reasons.

2. UAW and the *Flowers* plaintiffs seek an order expanding the twenty-five (25) page limit imposed by U.S.D.C. Local Rule 7.1(d)(3)(A) for the reasons set forth below.

3. The Amended Objection addresses the City of Detroit's eligibility for relief under Chapter 9, the City's Consolidated Reply to objections, and filings by the State of Michigan. These filing raises serious issues arising under the federal and state constitutions, and the Bankruptcy Code, including the validity of the State's authorization for the Chapter 9 filing, good faith and related matters. The legal issues presented require substantial explanation and analysis of constitutional, and state and federal statutory and case law.

4. The Amended Objection exceeds the limitation set forth in U.S.D.C. Local Rule 7.1(d)(3)(A) and is itself forty-one (41) pages long, thus independently warranting relief from the page limit in order to address the complex issues presented.

WHEREFORE, for the foregoing reasons UAW and the *Flowers* plaintiffs respectfully request that this Court enter an order substantially in the form attached hereto as Exhibit 1 and grant such other relief as the Court deems proper.

Dated: New York, New York
October 11, 2013

Respectfully submitted,

International Union, UAW

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