

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

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

NOTICE OF APPEARANCE AND REQUEST
FOR NOTICES AND SERVICE OF PAPERS

PLEASE TAKE NOTICE that International Union, UAW (“UAW”), through its undersigned counsel, submits this Notice of Appearance and, pursuant to Federal Rules of Bankruptcy Procedure Rules 2002 and 9010(b) and 11 U.S.C. §§ 901(a) and 1109(b), requests that all notices given or required to be given and all papers served in this Chapter 9 case be delivered to and served upon the counsel as follows:

Michael Nicholson
Niraj R. Ganatra
International Union, UAW
8000 East Jefferson Avenue
Detroit, Michigan 48214
Telephone: (313) 926-5216
Facsimile: (313) 926-5240
Email: mnicholson@uaw.net

Babette A. Ceccotti
Cohen, Weiss and Simon LLP
330 West 42nd Street
New York, New York 10036
Telephone (212) 356-0227
Facsimile: (646) 473-8227
Email: bceccotti@cwsny.com

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Papers is without prejudice to the International Union, UAW’s rights, remedies, and claims against other entities or any objection that may be had to the subject-matter jurisdiction of the Court, the Court’s jurisdiction over the City of Detroit, or the City of Detroit’s eligibility to commence and/or maintain proceedings under Title 11 of the United States Code,

and shall not be deemed or construed to submit International Union, UAW to the jurisdiction of the Court. This Notice is not intended, nor shall it be deemed, to be a consent to or waiver of the right to challenge the jurisdiction of this Court to adjudicate any matter, including, without limitation, whether these proceedings are properly authorized under Michigan or federal law, and any non-core matter; nor is it a consent to or waiver of any right to a jury trial which might be available on any issue during the course of these proceedings, all of which rights are expressly reserved. All rights, remedies, and claims are hereby expressly reserved, including without limitation, International Union, UAW's either this notice nor any subsequent appearance, pleading, claim or suit shall waive (i) the right of the UAW to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) the right of the UAW to a trial by jury in any proceeding so triable in this or any other case, controversy, or proceeding related to these cases, or (iii) right to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal.

Dated: July 23, 2013
Detroit, MI

International Union, UAW

By: /s/ Niraj R. Ganatra
Niraj R. Ganatra (P63150)
Michael Nicholson (P33421)
8000 East Jefferson Avenue
Detroit, Michigan 48214
T: (313) 926-5216

Cohen, Weiss and Simon LLP
Babette A. Ceccotti
330 West 42nd Street
New York, New York 10036-6976
T: 212-563-4100

Attorneys for International Union, UAW