

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

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

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**STIPULATION TO ENTRY OF PROTECTIVE ORDER**

The City of Detroit, Michigan, the Police and Fire Retirement System of the City of Detroit, and the General Retirement System of the City of Detroit stipulate to entry of the Protective Order attached as Exhibit 1 hereto.

Stipulated and agreed to by:

JONES DAY

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# EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT  
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**STIPULATED PROTECTIVE ORDER**

This matter having come before the Court upon the Stipulation of the City of Detroit, Michigan (the “City”), the Police and Fire Retirement System of the City of Detroit (“PFRS”), and the General Retirement System of the City of Detroit (“GRS,” and together with PFRS, the “Retirement Systems”); the City having subpoenaed documents from the Retirement Systems’ actuary, Gabriel, Roeder, Smith & Co.; the Retirement Systems having reviewed the documents requested by the City and having determined that they may contain personally identifiable information including, but not limited to, social security numbers, dates of birth, pension identification numbers, home addresses, home telephone numbers, and financial account numbers of pensioners; and the City and the Retirement Systems desiring to protect personally identifiable information from disclosure; and the Court finding good cause for granting the relief herein:

**IT IS HEREBY ORDERED:**

1. The City shall keep confidential all personally identifiable information of third parties contained in any and all documents and materials that it receives from the Retirement Systems or Gabriel Roeder Smith & Co. Personally identifiable information shall include names, physical and electronic addresses, telephone numbers, social security numbers, dates of birth, pension identification numbers, financial account numbers, and any other information whose disclosure would create an undue risk of identity theft or other unlawful injury.

2. Nothing in this Order shall be deemed to waive any objections to the production of documents that the Retirement Systems may be entitled to assert under state and federal law, including M.C.L. § 38.1140h.

3. Nothing in this Order shall be deemed to waive any privileges that the Retirement Systems may be entitled to assert, including the attorney-client, work product, and/or accountant-client privileges.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.