

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

IN RE: Chapter 9  
City of Detroit, Michigan, Case No. 13-53846  
Debtor.

**CERTIFICATE OF SERVICE**

The undersigned certifies that on October 17, 2013, the Pre-Trial Brief of the Detroit Public Safety Unions, Consisting of the Detroit Fire Fighters Association (the "DFFA"), the Detroit Police Officers Association (the "DPOA"), The Detroit Police Lieutenants & Sergeants Association (the "DPLSA") and The Detroit Police Command Officers Association (the "DPCOA") was electronically filed with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

/s/ Barbara A. Patek  
BARBARA A. PATEK (P34666)  
Erman, Teicher, Miller,  
Zucker & Freedman, P.C.  
400 Galleria Officentre, Ste. 444  
Southfield, MI 48034  
Telephone: 248-827-4100  
Facsimile: 248-827-4106  
Email: [bpatek@ermanteicher.com](mailto:bpatek@ermanteicher.com)

Dated: October 18, 2013