

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

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In re : Chapter 9
: :
CITY OF DETROIT, MICHIGAN, : Case No. 13-53846
: :
Debtor. : Hon. Steven W. Rhodes
: :
: :
: :
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**EX PARTE MOTION OF DEBTOR FOR AN ORDER
AUTHORIZING IT TO FILE A REPLY IN EXCESS OF PAGE LIMIT**

The City of Detroit, Michigan (the "Debtor"), as the debtor in the above-captioned case, hereby moves the Court, pursuant to Rule 9014-1(e) of the Local Rules for the United States Bankruptcy Court for the Eastern District of Michigan (the "Local Bankruptcy Rules"), for the entry of an order authorizing the Debtor to file its reply (its "Reply") in support of the (i) Motion of Debtor, Pursuant to Section 105(a) of the Bankruptcy Code, for Entry of an Order Extending the Chapter 9 Stay to Certain (A) State Entities, (B) Non-Officer Employees and (C) Agents and Representatives of the Debtor (Docket No. 56) (the "Stay Extension Motion"); and (ii) Motion of Debtor, Pursuant to Section 105(a) of the Bankruptcy Code, for Entry of an Order Confirming the Protections of Sections 362, 365 and 922 of the Bankruptcy Code (Docket No. 53)

(the "Stay Confirmation Motion" and, together with the Stay Extension Motion, the "Stay Motions")¹ in excess of the page limit imposed by Local Bankruptcy Rule 9014-1(e).²

1. The Stay Extension Motion, filed on July 19, 2013, seeks the entry of an order extending the Chapter 9 Stay to (a) the State Entities, (b) the Non-Officer Employees and (c) the City Agents and Representatives. The Stay Confirmation Motion, also filed on July 19, 2013, seeks the entry of a "comfort order" confirming the application of the Chapter 9 Stay and the Contract Protections.

2. On July 22, 2013, the Michigan Council 25 of the American Federation of State, County and Municipal Employees, AFL-CIO filed a 30-page objection (Docket No. 84) (the "AFSCME Objection") to, among other motions filed by the Debtor, the Stay Motions.

3. Local Rule 9014-1(e) restricts the Debtor's Reply to the AFSCME Objection to five pages. E.D. Mich. LBR 9014-1(e).

¹ Capitalized terms not otherwise defined herein have the meanings given to them in the Stay Motions.

² Pursuant to Rule 7.1(d)(3)(B) of the Local Rules (the "Local Civil Rules") for the United States District Court for the Eastern District of Michigan (the "District Court"), the text of a reply brief, including footnotes and signatures, may not exceed seven pages. The Debtor understands that the page limit set forth in Local Civil Rule 7.1(d)(3)(B) was changed from five pages to seven pages upon the District Court's adoption of a new rule that requires 14 point font in all papers. See Local Civil Rule 5.1(a)(3).

4. The Debtor submits that it requires more than five pages to meaningfully reply to the myriad issues raised in the AFSCME Objection — which itself exceeds the 25 page limit set forth in Local Civil Rule 7.1(d)(3)(A).

Accordingly, the Debtor respectfully requests that it be (a) granted relief from Local Bankruptcy Rule 9014-1(e) and (b) permitted to file its Reply in excess of five pages in length.

WHEREFORE, the Debtor respectfully requests that this Court:

(i) enter an order substantially in the form attached hereto as Exhibit 1, granting the relief sought herein; and (ii) grant such other and further relief to the Debtor as the Court may deem proper.

Dated: July 23, 2013

Respectfully submitted,

/s/ David G. Heiman

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ATTORNEYS FOR THE DEBTOR

SUMMARY OF ATTACHMENTS

The following documents are attached to this Motion, labeled in accordance with Local Rule 9014-1(b).

Exhibit 1	Proposed Form of Order
Exhibit 2	None [Motion Seeks <i>Ex Parte</i> Relief]
Exhibit 3	None [Brief Not Required]
Exhibit 4	None [Separate Certificate of Service To Be Filed]
Exhibit 5	None [No Affidavits Filed Specific to This Motion]
Exhibit 6	None [No Documentary Exhibits Filed Specific to this Motion]

EXHIBIT 1

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**EX PARTE ORDER AUTHORIZING
DEBTOR TO FILE A REPLY IN EXCESS OF PAGE LIMIT**

This matter coming before the Court on the *Ex Parte* Motion of Debtor for an Order Authorizing it to File a Reply in Excess of Page Limit (the "Motion"),¹ filed by the City of Detroit, Michigan (the "Debtor"); and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

¹ Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

2. The Debtor is granted relief from Local Bankruptcy Rule 9014-1(e) and may file its Reply in excess of five pages.