

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – Detroit

In re:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**EX-PARTE MOTION FOR EXPEDITED HEARING ON  
GET BACK UP, INC.'S MOTION FOR  
RELIEF FROM THE AUTOMATIC STAY AND FOR  
WAIVER OF PROVISIONS OF FED.R.BANKR.P. 4001 (a)(3)**

Get Back Up, Inc. (“GBU”) in support of its Ex-Parte Motion for Expedited Hearing on GBU’s Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) states as follows:

1. On October 22, 2013, GBU filed its Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) (Docket No. 1314).
2. That Motion requires an expedited hearing because there is a pending motion to be resolved in the case before Judge Robert Cleland in the U.S. District Court.
3. For the reasons set forth in the motion for relief from the automatic stay, Movant believes that relief from stay is necessary as soon as possible.

WHEREFORE, GBU respectfully requests this Honorable Court grant its Ex-Parte Motion for Expedited Hearing on GBU’s Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) as more fully set forth in the proposed order attached hereto as **Exhibit A**.

Respectfully submitted,

By: /s/ Jonathan B. Frank

Jonathan B. Frank (P42656)

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Dated: October 22, 2013

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**EXHIBIT LIST TO EX-PARTE MOTION FOR EXPEDITED HEARING ON  
GET BACK UP, INC.'S MOTION FOR  
RELIEF FROM THE AUTOMATIC STAY AND FOR  
WAIVER OF PROVISIONS OF FED.R.BANKR.P. 4001 (a)(3)**

Exhibit A: Order Granting Ex-Parte Motion for Expedited Hearing on Get Back Up, Inc.'s Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed.R.Bankr.P. 4001(a)(3)

# Exhibit A

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**ORDER GRANTING EX-PARTE MOTION FOR EXPEDITED HEARING ON  
GET BACK UP, INC.'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY  
AND FOR WAIVER OF PROVISIONS OF FED.R.BANKR.P. 4001 (a)(3)**

THIS MATTER having come before the Court on GBU's Ex-Parte Motion for Expedited Hearing on GBU's Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3), and the Court otherwise being duly advised in the premises;

**IT IS HEREBY ORDERED** Ex-Parte Motion for Expedited Hearing on GBU's Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) is GRANTED.

**IT IS FURTHER ORDERED** GBU's Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) shall be heard on \_\_\_\_\_, 2013 at \_\_\_\_\_.

**EXHIBIT A**