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 30, 2013, the Supplemental Brief of the Detroit Public Safety Unions on Eligibility Pursuant to Order Regarding Further Briefing on Eligibility [Docket No. 1217] 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.

> <u>/s/ Barbara A. Patek</u> 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

Dated: October 31, 2013