

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

In re:

CITY OF DETROIT, MICHIGAN

Chapter 9

Debtor.

Case No. 13-53846

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**NOTICE OF APPEARANCE AND REQUEST FOR DOCUMENTS UNDER  
11 U.S.C. § 1109(b) AND FED. R. BANKR. P. 2002, 3017(a), 9007, 9010**

**PLEASE TAKE NOTICE** that the undersigned hereby files an appearance as counsel to the Detroit Retired City Employees Association, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017(a), 9007, 9010 and 11 U.S.C. § 1109(b), requests that he be added to the matrix and that copies of all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statement(s) and plan(s) of reorganization, or other documents, filed or entered in this case, be transmitted to the following:

LIPPITT O'KEEFE, PLLC  
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**PLEASE TAKE FURTHER NOTICE** that neither Notice of Appearance nor any subsequent appearance, pleading, claim or suit shall waive (i) the right of the Detroit Retired City Employees Association to have final orders in non-core matters entered only after de novo review by the District Court; (ii) the right of the Detroit Retired City Employees Association to a trial by jury in any proceeding so triable in the above-captioned case or any case, controversy, or proceeding related to this case; (iii) the right of the Detroit Retired City Employees Association to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which the right of the Detroit Retired City Employees Association is

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or may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly persevered.

**PLEASE TAKE FURTHER NOTICE** that this Appearance in no way acknowledges the jurisdiction of this Court or the constitutionality of the City of Detroit's Chapter 9 bankruptcy filing (as currently challenged by The General Retirement System of the City of Detroit and the Police and Fire Department System of the City of Detroit in Case No. 13-768-CZ currently pending in Ingham County Circuit Court before the Honorable Clinton Canady III).

**PLEASE TAKE FURTHER NOTICE** that this Appearance does not waive any defenses related to jurisdiction or constitutionality of the City of Detroit's filing that may be available to the Detroit Retired City Employees Association.

Respectfully submitted,

LIPPITT O'KEEFE, PLLC

/s/ Brian D. O'Keefe  
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Dated: July 24, 2013