# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN <br> SOUTHERN DIVISION 

| In re: | ) |
| :--- | :--- |
| CITY OF DETROIT, MICHIGAN, | ) |
|  | ) |
| Debtor. | ) |
|  |  |

Chapter 9
Case No. 13-53846
Hon. Steven W. Rhodes

# THE DETROIT RETIREMENT SYSTEMS' JOINDER IN AND CONCURRENCE WITH THE MOTION OF THE OBJECTORS FOR LEAVE TO CONDUCT LIMITED DISCOVERY IN CONNECTION WITH MOTION OF THE DEBTOR FOR A FINAL ORDER PURSUANT TO 11 U.S.C. §§ 105, 362, 364(C)(1), 364(C)(2), 364(E), 364(F), 503, 507(A)(2), 904, 921 AND 922 (I) APPROVING POST-PETITION FINANCING, (II) GRANTING LIENS AND PROVIDING SUPERPRIORITY CLAIM STATUS AND (III) MODIFYING AUTOMATIC STAY 

The Police and Fire Retirement System of the City of Detroit ("PFRS") and the General Retirement System of the City of Detroit ("GRS," and together with PFRS, the "Retirement Systems") hereby joins in and concurs with the Motion of the Objectors for Leave to Conduct Limited Discovery in Connection with Motion of the Debtor for a Final Order Pursuant to 11 U.S.C. §§ 105, 362, 364(c)(1), 364(c)(2), 364(e), 364(f), 503, 507(a)(2), 904, 921 and 922 (I) Approving PostPetition Financing, (II) Granting Liens and Providing Superpriority Claim Status and (III) Modifying Automatic Stay [Dkt. No. 1640] (the "Motion").

In support of this joinder, the Retirement Systems adopt and incorporate the legal arguments in the Motion in their entirety as if fully set forth in this joinder. The Retirement Systems intend to file an objection to the Motion of the Debtor for a Final Order Pursuant to 11 U.S.C. §§ 105, 362, 364(c)(1), 364(c)(2), 364(e), 364(f), 503, 507(a)(2), 904, 921 and 922 (I) Approving Post-Petition Financing, (II) Granting Liens and Providing Superpriority Claim Status and (III) Modifying Automatic Stay [Dkt. No. 1520].

WHEREFORE, for the reasons set forth in the Motion, the Retirement Systems respectfully request that the Court (i) grant the relief requested in the Motion and (ii) grant such other relief as the Court deems proper.

CLARK HILL PLC

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Dated: November 13, 2013
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Retirement System of the City of Detroit

## EXHIBIT 1

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION 

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| CITY OF DETROIT, MICHIGAN, | ) | Case No. 13-53846 |
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| Debtor. | ) | Hon. Steven W. Rhodes |
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## CERTIFICATE OF SERVICE

The undersigned certifies that on November 13, 2013, The Detroit Retirement Systems' Joinder in and Concurrence with the Motion of the Objectors for Leave to Conduct Limited Discovery in Connection with Motion of the Debtor for a Final Order Pursuant to 11 U.S.C. §§ 105, 362, 364(c)(1), 364(c)(2), 364(e), 364(f), 503, 507(a)(2), 904, 921 and 922 (I) Approving Post-Petition Financing, (II) Granting Liens and Providing Superpriority Claim Status and (III) Modifying Automatic Stay was filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

CLARK HILL PLC<br>/s/ Robert D. Gordon<br>Robert D. Gordon (P48627)<br>151 South Old Woodward Avenue, Suite 200<br>Birmingham, Michigan 48009<br>Telephone: (248) 988-5882<br>Facsimile: (248) 988-2502<br>rgordon@clarkhill.com

Dated: November 13, 2013
Counsel to the Police and Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit

