UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:

Chapter 9

CITY OF DETROIT, MICHIGAN Debtor.

No. 13-53846

HON. STEVEN W. RHODES

<u>NOTICE OF APPEAL FROM OPINION AND ORDER</u> <u>DENYING NAACP'S MOTION FOR RELIEF FROM STAY</u>

PLEASE TAKE NOTICE THAT Detroit Branch NAACP, Michigan State Conference NAACP, Donnell White, individually and on behalf of Detroit Branch NAACP and Michigan State Conference NAACP, Thomas Stallworth III, individually, Rashida Tlaib, individually, and Maureen Taylor, individually, pursuant to 28 U.S.C. 158(a) and Rules 8001(a) and 8002(a) of the Federal Rules of Bankruptcy Procedure, file this notice of appeal to the United State District Court for the Eastern District of Michigan, Southern Division from the order of the United States Bankruptcy Court for the Eastern District of Michigan (the Honorable Steven W. Rhodes, presiding) [Docket No. 1536-1, November 6, 2013] (the "Order").

This notice of appeal is timely filed pursuant to Federal Rule of Bankruptcy Procedure 8002(a). The names to the parties to the appeal, as well as other affected parties, and the names and addresses of their respective counsel are as follows:

APPELLANTS

Detroit Branch NAACP, Michigan State Conference NAACP, Donnell White, individually and on behalf of Detroit Branch NAACP and Michigan State Conference NAACP, Thomas Stallworth III, individually, Rashida Tlaib, individually, and Maureen Taylor, individually,

represented by:

Nabih H. Ayad AYAD LAW, PLLC 2200 Canton Center Road, Suite 220 Telephone: (734) 983-0500 Facsimile: (734) 983-0520

-and-

Melvin Butch Hollowell General Counsel, Detroit Branch NAACP 8220 Second Avenue Detroit, Michigan 48221 Telephone: 313-871-2087 Facsimile: (313) 871-7745

APPELLEES

City of Detroit, represented by:

Bruce Bennett JONES DAY 555 S. Flower Street 50th Floor Los Angeles, CA 90071 Telephone: (213) 489-3939 Facsimile: (213) 243-2539

David Gilbert Heiman JONES DAY 901 Lakeside Avenue Cleveland, OH 44114 Telephone: (216) 586-7175 Facsimile: (216) 579-0212

Heather Lennox JONES DAY 222 East 41st Street New York, NY 10017 Telephone: (212) 326-3939 Facsimile: (212) 755-7306

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Stephen S. LaPlante Eric D. Carlson Timothy A. Fusco Jonathan S. Green Marc N. Swanson MILLER CANFIELD, PLC 150 West Jefferson Suite 2500 Detroit, MI 48226 Telephone: (313) 963-6420 Facsimile: (313) 496-7500

Robert S. Hertzberg Deborah Kovsky-Apap Kay Standridge Kress PEPPER HAMILTON LLP 4000 Town Center Suite 1800 Southfield, MI 48075-1505 Telephone: (248) 359-7300 Facsimile: (248) 359-7700

Other Interested Parties:

State of Michigan, represented by:

Matthew Schneider Nicole A. Grimm Assistant Attorney General P.O. Box 30736 Lansing, Michigan 48909 Telephone: (517) 373-3042 Facsimile: (517) 373-3042

Steve Howell Special Assistant Attorney General 500 Woodward Avenue Suite 4000 Detroit MI 48226 Telephone: (313) 223-3500 Respectfully Submitted,

AYAD LAW, P.L.L.C.

/s/ Nabih H. Ayad

Nabih H. Ayad (P-59518) Attorney for Petitioners 2200 North Canton Center Road, Suite 220 Canton, Michigan 48187 734-983-0500 nayad@ayadlaw.com

/s/ Melvin Butch Hollowell

MELVIN BUTCH HOLLOWELL(P-37834) General Counsel Detroit Branch NAACP 8220 Second Avenue Detroit, Michigan 48221 313-871-2087 <u>butchhollowell@gmail.com</u>

Date: November 18, 2013

CERTIFICATE OF SERVICE

I, Nabih H. Ayad, counsel for Petitioners, states as an officer of the Court that on

November 18, 2013 the foregoing document, Notice of Appeal and Bankruptcy Matter Cover

Sheet attached thereto, was electronically filed with the Clerk of the Court using the ECF system,

and will send notification of such filing to all ECF participants registered in this matter.

Respectfully Submitted,

AYAD LAW, P.L.L.C.

/s/ Nabih H. Ayad____

Nabih H. Ayad (P-59518) Attorney for Petitioners 2200 North Canton Center Road, Suite 220 Canton, Michigan 48187 734-983-0500 nayad@ayadlaw.com

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United States District Court Eastern District of Michigan	Bankruptcy Matter Civil Case Cover Sheet	District Court Label
In re: City of Detroit		
	Case No.: 13-53846	
Debtor.		
Adv. No.:		
Appellant,		
V.		
Appellee.		
CAUSE OF ACTION/NATURE OF SUIT: (Thi	is matter is referred to the district court for the following	reasons)
<u>X</u> [422] 28 U.S.C. 158	Bankruptcy Appeal	
[422] 28 U.S.C. 158	Motion for Leave to Appeal	
[423] 28 U.S.C. 157(d)	Motion for Withdrawal of Reference	
[423] 28 U.S.C. 157(c) (1)	Proposed Findings of Fact and Conclusions of Law	
[423] 28 U.S.C. 158 (c) (a)	Order of Contempt	
** Matter relates to the administratively stayed District of Michigan before the Honorable Geo		
Date: <u>11/18/2013</u> Name: <u>/s/ Nabih H. Ayad</u>		
Name and Address of Interested Parties (See Below)		

APPELLANTS

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