

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

In re:)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes
)	

STIPULATION TO ENTRY OF PROTECTIVE ORDER

The City of Detroit, Michigan, the Police and Fire Retirement System of the City of Detroit, the General Retirement System of the City of Detroit and the COPs Holders¹ stipulate to entry of the Protective Order attached as Exhibit 1 hereto.

¹ The COPs Holders include the following: (1) Hypothekbank Frankfurt AG, Hypothekbank Frankfurt International S.A., and Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A., (2) FMS Wertmanagement, and (3) the Ad Hoc COPs Holders, as disclosed on Exhibit 1 to the Verified Statement Pursuant to Rule 2019 filed on August 16, 2013 [Dkt. No. 359].

Stipulated and agreed to by:

JONES DAY

/s/ Evan Miller

Evan Miller
51 Louisiana Ave., N.W.
Washington, D.C. 20001
Telephone: (202) 879-3939
emiller@jonesday.com

and

David G. Heiman (OH 0038271)
Heather Lennox (OH 0059649)
North Point
901 Lakeside Avenue
Cleveland, Ohio 441144
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
dgheiman@jonesday.com
hlennox@jonesday.com

and

Jonathan S. Green (MI P33140)
MILLER, CANFIELD, PADDOCK
AND STONE, P.L.C.
150 West Jefferson, Suite 2500
Detroit, Michigan 48226
Telephone: (313) 963-6420
Facsimile: (313) 496-7500
green@millercanfield.com
laplante@millercanfield.com

*Counsel to the City of Detroit,
Michigan*

CLARK HILL PLC

/s/ Robert D. Gordon

Robert D. Gordon (P48627)
Shannon L. Deeby (P60242)
151 South Old Woodward Avenue
Suite 200
Birmingham, Michigan 48009
Telephone: (248) 988-5882
Facsimile: (248) 988-2502
rgordon@clarkhill.com
sdeeby@clarkhill.com

*Counsel to the Police and Fire
Retirement System of the City of Detroit
and the General Retirement System of
the City of Detroit*

/s/ Howard S. Scher
Howard S. Scher, Esquire
Jacob & Weingarten, P.C.
Somerset Place
2301 W. Big Beaver Road, Suite 777
Troy, Michigan 48084
Tel: (248) 649-1200
Fax: (248) 649-2920
howard@jacobweingarten.com

Vincent J. Marriott, III, Esquire
Ballard Spahr LLP
1735 Market Street, 51st Floor
Philadelphia, Pennsylvania 19103
Tel: (215) 864-8236
Fax: (215) 864-9762
E-mail: marriott@ballardspahr.com

-and-

Matthew G. Summers, Esquire
Ballard Spahr LLP
919 North Market Street, 11th Floor
Wilmington, Delaware 19801
Telephone: (302) 252-4428
Facsimile: (302) 252-4466
E-mail: summersm@ballardspahr.com

*Attorneys for Hypothekenbank
Frankfurt AG, Hypothekenbank
Frankfurt International S.A., Erste
Europäische Pfandbrief- und
Kommunalkreditbank Aktiengesellschaft
in Luxemburg S.A*

/s/ Rick L. Frimmer
Rick L. Frimmer
Michael W. Ott
SCHIFF HARDIN, LLP
233 S. Wacker Drive, Ste. 6600
Chicago, IL 60606
312-258-5500
Fax: 312-258-5600
rfrimmer@schiffhardin.com
mott@schiffhardin.com

Counsel to FMS Wertmanagement

/s/ Deborah L. Fish
ALLARD & FISH, P.C.
Deborah L. Fish
2600 Buhl Building
535 Griswold
Detroit, MI 48226
Telephone: (313) 961-6141
Facsimile: (313) 961-6142
dfish@allardfishpc.com
P36580

- and -

KRAMER LEVIN NAFTALIS &
FRANKEL LLP
Thomas Moers Mayer
Jonathan M. Wagner
1177 Avenue of the Americas
New York, New York 10036
Telephone: (212) 715-9100
Facsimile: (212) 715-8000

Counsel to the Ad Hoc COPs Holders

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EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
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In re:)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
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STIPULATED PROTECTIVE ORDER

This matter having come before the Court upon the Stipulation of the City of Detroit, Michigan (the “City”), the Police and Fire Retirement System of the City of Detroit (“PFRS”), the General Retirement System of the City of Detroit (“GRS,” and together with PFRS, the “Retirement Systems”) and the COPs Holders; the COPs Holders having requested that the Retirement Systems’ actuary, Gabriel, Roeder, Smith & Co. provide it with the actuarial valuation member data (“census data”): (a) which was used by Gabriel, Roeder, Smith & Co. in its June 30, 2012 actuarial valuation reports for the Retirement Systems’ pension plans; (b) which was used by Gabriel, Roeder, Smith & Co. in its June 30, 2011 actuarial valuation report on retiree health benefits or OPEB; and (c) which may be used by Gabriel, Roeder, Smith & Co. in any subsequent actuarial valuation reports on the Retirement Systems’ pension plans or on retiree health benefits or OPEB for 2012, 2013, or 2014; the Retirement Systems having approved the production of the

census data requested by the COPs Holders and having determined that the data may contain personally identifiable information including, but not limited to, social security numbers, dates of birth, pension identification numbers, home addresses, home telephone numbers, and financial account numbers of pensioners; and the City and the Retirement Systems desiring to protect personally identifiable information from disclosure; and the Court finding good cause for granting the relief herein:

IT IS HEREBY ORDERED:

1. The COPs Holders shall keep confidential all personally identifiable information of third parties contained in any and all documents and materials that it receives from the Retirement Systems or Gabriel Roeder Smith & Co. Personally identifiable information shall include names, physical and electronic addresses, telephone numbers, social security numbers, dates of birth, pension identification numbers, financial account numbers, and any other information whose disclosure would create an undue risk of identity theft or other unlawful injury.

2. The COPs Holders shall provide their attorneys, financial advisors, actuaries and agents with a copy of the stipulated Order and obtain each such person or entity's agreement to be bound by the stipulated Order in advance of such person or entity receiving any of the census data.

3. Nothing in this Order shall be deemed to waive any objections to the production of documents that the Retirement Systems may be entitled to assert under state and federal law, including M.C.L. § 38.1140h.

4. Nothing in this Order shall be deemed to waive any privileges that the Retirement Systems may be entitled to assert, including the attorney-client, work product, and/or accountant-client privileges.

5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.