

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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

**RESPONSE TO 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**

Greektown Casino LLC and Detroit Entertainment, L.L.C. d/b/a Motor City Casino Hotel (the “Casinos”), by their undersigned counsel, for their Response to 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 state that:

1. The City’s proposed financing would have a direct impact on the Casinos.
2. The Casinos are subject to significant regulation and believe the proposed order approving the transaction and perhaps other transaction documents need to be modified to ensure (a) no alteration to the Casinos’ existing financial obligations, (b) no adverse effect on the Casinos’ gaming licensure, and (c) no possibility of regulatory agency sanction of the Casinos.
3. The Casinos have discussed their concerns with counsel for the City and for Barclays Capital, Inc., and believe their concerns will be addressed in subsequent revisions to the proposed order and transactional documents.

4. Nonetheless, the Casinos reserve the right to object to any form of proposed order or transactional documents that fail to address the items set forth above.

Respectfully submitted,

Honigman Miller Schwartz and Cohn LLP  
Attorneys for Greektown Casino LLC and Detroit  
Entertainment LLC d/b/a Motor City Casino Hotel

By: /s/ Judy B. Calton

Judy B. Calton (P38733)

Andrea L. Hansen (P47358)

2290 First National Building

660 Woodward Avenue

Detroit, MI 48226

(313) 465-7344

[jcalton@honigman.com](mailto:jcalton@honigman.com)

[ahansen@honigman.com](mailto:ahansen@honigman.com)

Dated: November 21, 2013

**CERTIFICATE OF SERVICE**

I certify that on November 21, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing all counsel of record.

HONIGMAN MILLER SCHWARTZ AND COHN LLP  
Attorneys for Greektown Casino LLC and Detroit  
Entertainment LLC d/b/a Motor City Casino Hotel

By: /s/ Judy B. Calton  
Judy B. Calton (P38733)  
Andrea L. Hansen (P47358)  
2290 First National Building  
660 Woodward Avenue  
Detroit, MI 48226  
(313) 465-7344  
jcalton@honigman.com