

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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

MGM Grand Detroit, LLC (“MGM”), by its undersigned counsel, for its 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 states that:

1. The City’s proposed financing would have a direct impact on MGM.
2. MGM is subject to significant regulation and believes the proposed order approving the transaction and perhaps other transaction documents need to be modified to ensure (a) no alteration to MGM’s existing financial obligations, (b) no adverse effect on MGM’s gaming licensure, (c) no alteration of remedies with respect to the Pledged Wagering Tax Revenues without advance notice and opportunity to object given to MGM, and (d) no possibility of regulatory agency sanction of MGM.

3. MGM believes its concerns will be addressed in subsequent revisions to the proposed order and transactional documents.

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

Respectfully submitted,

DICKINSON WRIGHT PLLC

By: /s/ Michael C. Hammer

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Attorneys for MGM Grand Detroit, LLC

Dated: November 21, 2013

CERTIFICATE OF SERVICE

On November 21, 2013, I filed the foregoing document using the CM/ECF system, which will send electronic notice of the filing to all counsel of record in this matter.

By: /s/ Michael C. Hammer

Michael C. Hammer (P41705)

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