

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - Detroit

IN THE MATTER OF:

CITY OF DETROIT, MICHIGAN

Debtor.
_____/

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**EX-PARTE MOTION FOR EXPEDITED HEARING ON
MICHIGAN PROPERTY TAX RELIEF, LLC'S MOTION FOR
RELIEF FROM THE AUTOMATIC STAY AND FOR
WAIVER OF PROVISIONS OF FED.R.BANKR.P. 4001 (a) (3)**

NOW COMES Michigan Property Tax Relief, LLC, by and through its counsel, OSIPOV BIGELMAN, P.C., and in support of its Ex-Parte Motion for Expedited Hearing on Michigan Property Tax Relief, LLC's Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) states as follows:

1. On July 29, 2013, Michigan Property Tax Relief, LLC filed its Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) (Docket No.).

2. That Motion requires an expedited hearing because the deadline to file a property tax appeal with the Michigan Tax Tribunal is July 31, 2013.

3. For the reasons set forth in the motion for relief from the automatic stay, Movant believes that relief from stay is necessary on or before July 31, 2013 to file its clients' property tax appeals. Movant is presently of the understanding that the Michigan Tax Tribunal will not consider any property tax appeals filed after that date.

4. In the alternative, if this Court is unable to hold an expedited hearing on or before July 31, 2013, Movant requests this Court give relief from stay to simply file its clients' property

tax appeals pending resolution of Movant's motion for relief from the automatic stay,

WHEREFORE, Michigan Property Tax Relief, LLC respectfully requests this Honorable Court grant its Ex-Parte Motion for Expedited Hearing on Michigan Property Tax Relief, LLC's Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) as more fully set forth in the proposed order attached hereto as **Exhibit A**. In the alternative, Movant requests that this Court enter an order enabling Movant and its clients to file its property tax appeals pending resolution of the motion for relief from the automatic stay.

Respectfully submitted,

OSIPOV BIGELMAN, P.C.

Dated: July 29, 2013

/s/ William C. Blasses

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**ORDER GRANTING EX-PARTE MOTION FOR EXPEDITED HEARING ON
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WAIVER OF PROVISIONS OF FED.R.BANKR.P. 4001 (a) (3)**

THIS MATTER having come before the Court on Michigan Property Tax Relief, LLC's Ex-Parte Motion for Expedited Hearing on Michigan Property Tax Relief, LLC's Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3), and the Court otherwise being duly advised in the premises;

IT IS HEREBY ORDERED Ex-Parte Motion for Expedited Hearing on Michigan Property Tax Relief, LLC's Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) is GRANTED.

IT IS FURTHER ORDERED Michigan Property Tax Relief, LLC's Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) shall be heard on July 31, 2013 at 10:00 a.m.

EXHIBIT A