

**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
	)	

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**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, National Public Finance Guarantee Corporation, Assured Guaranty Municipal Corp., and Ambac Assurance Corporation stipulate to entry of the Protective Order attached as **Exhibit 1** hereto.

Stipulated and agreed to on December 11, 2013 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 Ave.  
Cleveland, OH 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, MI 48226  
Telephone: (313) 963-6420  
Facsimile: (313) 496-7500  
green@millercanfield.com  
laplante@millercanfield.com

*Counsel for the City of Detroit,  
Michigan*

CLARK HILL PLC

/s/ Robert D. Gordon

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

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

JAFFE RAITT HEUER & WEISS, P.C. CHADBOURNE & PARKE LLP

/s/ Paul R. Hage  
Louis P. Rochkind (P24121)  
Paul R. Hage (P70460)  
27777 Franklin Road, Suite 2500  
Southfield, MI 48034-821  
Telephone: (248) 351-3000  
lrochkind@jaffelaw.com  
phage@jaffelaw.com

-and-

SIDLEY AUSTIN LLP

James F. Bendernagel, Jr.  
Guy S. Neal  
1501 K Street, N.W.  
Washington, D.C. 20005  
Telephone: (202) 736-8041  
jbbendernagel@sidley.com  
gneal@sidley.com

Jeffrey E. Bjork  
555 West Fifth Street, Suite 4000  
Los Angeles, CA 90013  
Telephone: (213) 896-6000  
jbjork@sidley.com

*Counsel for National Public Finance  
Guarantee Corp.*

/s/ Lawrence A. Larose  
Lawrence A. Larose  
Samuel S. Kohn  
Marc D. Ashley  
30 Rockefeller Plaza  
New York, NY 10012  
Telephone: (212) 408-5100  
llarose@chadbourne.com  
skohn@chadbourne.com  
mashley@chadbourne.com

*Counsel for Assured Guaranty  
Municipal Corp.*

ARENT FOX LLP

/s/ Carol Connor Cohen

Carol Connor Cohen  
Caroline Turner English  
1717 K Street, N.W.  
Washington, D.C. 20036-5342  
(202) 857-6054  
carol.cohen@arentfox.com

David L. Dubrow  
Mark A. Angelov  
1675 Broadway  
New York, NY 10019  
(212) 484-3900

-and-

SCHAFER AND WEINER, PLLC

Daniel J. Weiner (P32010)  
Brendan G. Best (P66370)  
40950 Woodward Ave., Ste. 100  
Bloomfield Hills, MI 48304  
(248) 540-3340  
bbest@schaferandweiner.com

*Counsel for Ambac Assurance  
Corporation*

# EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT  
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In re:	)	Chapter 9
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Debtor.	)	Hon. Steven W. Rhodes
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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”), National Public Finance Guarantee Corporation (“National”), Assured Guaranty Municipal Corp. (“Assured”), and Ambac Assurance Corporation (“Ambac”); National, Assured, and Ambac 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 National, Assured, and Ambac 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. National, Assured, and Ambac 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. National, Assured, and Ambac 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.