

**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 |
| |) | |
| |) | |

AMENDED NOTICE OF APPEAL¹

Pursuant to 28 U.S.C. § 158(a) and (d) and Rule 8001 of the Federal Rules of Bankruptcy Procedure, the Police and Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit (the “Retirement Systems”) file this notice of appeal of (i) the oral ruling issued from the bench on December 3, 2013 by the United States Bankruptcy Court for the Eastern District of Michigan regarding the City of Detroit’s eligibility for relief under Chapter 9 of the United States Bankruptcy Code (the “Oral Ruling”), (ii) the Opinion Regarding Eligibility [Dkt. No. 1945] (the “Opinion”), attached hereto as Exhibit 3, and (iii) the Order for Relief Under Chapter 9 of the Bankruptcy Code [Dkt. No. 1946] (the “Order for Relief”), attached hereto as Exhibit 4.

¹ This amends the Notice of Appeal, Dkt. No. 1930, solely to include the Opinion and Order for Relief (as defined below) as Exhibits 3 and 4.

The names of all parties to the Oral Ruling, the Opinion, and the Order for Relief, and the names, addresses, and telephone numbers of their respective attorneys are set forth below. In addition, approximately 92 individuals were invited to address the Bankruptcy Court at the hearing on September 19, 2013 regarding their objections to eligibility (the "Individual Objectors"). The Individual Objectors are listed on Exhibit 2 attached hereto.

The Police and Fire Retirement System of the City of Detroit
The General Retirement System of the City of Detroit

Represented by:

CLARK HILL PLC
Robert D. Gordon (P48627)
Shannon L. Deeby (P60242)
Jennifer K. Green (P69019)
Evan J. Feldman (P73437)
151 South Old Woodward Avenue
Suite 200
Birmingham, Michigan 48009
Telephone: (248) 988-5882
Facsimile: (248) 988-2502
rgordon@clarkhill.com

ARNOLD & PORTER LLP
Lisa Hill Fenning
777 South Figueroa Street
44th Floor
Los Angeles, California 90017
Telephone: (213) 243-4000
Facsimile: (213) 243-4199
lisa.fenning@aporter.com

The City of Detroit, Michigan

Represented by:

JONES DAY

Bruce Bennett (CA 105430)

555 South Flowers Street

Fiftieth Floor

Los Angeles, California 90071

Telephone: (213) 243-2382

Facsimile: (213) 243-2539

bbennett@jonesday.com

JONES DAY

David G. Heiman (OH 0038271)

Heather Lennox (OH 0059649)

North Point

901 Lakeside Avenue

Cleveland, Ohio 44114

Telephone: (216) 586-3939

Facsimile: (216) 579-0212

dgheiman@jonesday.com

hlennox@jonesday.com

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

Jonathan S. Green (MI P33140)

Stephen S. LaPlante (MI P48063)

150 West Jefferson

Suite 2500

Detroit, Michigan 48226

Telephone: (313) 963-6420

Facsimile: (313) 496-7500

green@millercanfield.com

laplante@millercanfield.com

The Detroit Fire Fighters Association

The Detroit Police Officers Association

The Detroit Police Lieutenants & Sergeants Association

The Detroit Police Command Officers Association

Represented by:

ERMAN, TEICHER, MILLER, ZUCKER & FREEDMAN, P.C.

Earle I. Erman (P24296)

Craig E. Zucker (P39907)

Barbara A. Patek (P34666)

400 Galleria Officentre, Suite 444

Southfield, MI 48034

Telephone: (249) 827-4100

Facsimile: (248) 827-4106

bpatek@ermanteicher.com

International Union of Operating Engineers, Local 324

Represented by:

SACHS WALDMAN, P.C.
Andrew Nickelhoff (P37990)
Mami Kato (P74237)
2211 East Jefferson Avenue, Suite 200
Detroit, MI 48207
Telephone: (313) 496-9429
Facsimile: (313) 965-4602
anickelhoff@sachswaldman.com
mkato@sachswaldman.com

Service Employees International Union, Local 517M

Represented by:

SACHS WALDMAN, P.C.
Andrew Nickelhoff (P37990)
Mami Kato (P74237)
2211 East Jefferson Avenue, Suite 200
Detroit, MI 48207
Telephone: (313) 496-9429
Facsimile: (313) 965-4602
anickelhoff@sachswaldman.com
mkato@sachswaldman.com

David Sole

Represented by:

JEROME D. GOLDBERG, PLLC
Jerome D. Goldberg (P61678)
2921 East Jefferson, Suite 205
Detroit, MI 48207
Telephone: (313) 393-6001
Facsimile: (313) 393-6007
apclawyer@sbcglobal.net

The Retired Detroit Police & Fire Fighters Association
Donald Taylor, individually and as President of the Retired Detroit Police & Fire Fighters Association
The Detroit Retired City Employees Association
Shirley V. Lightsey, individually and as President of the Detroit Retired City Employees Association

Represented by:

LIPPITT O'KEEFE, PLLC
Brian D. O'Keefe (P39603)
Ryan C. Plecha (P71957)
370 East Maple Road, 3rd Floor
Birmingham, MI 48009
Telephone: (248) 646-8292
rplecha@lippitokeefe.com

SILVERMAN & MORRIS, P.L.L.C.
Thomas R. Morris (P39141)
30500 Northwestern Highway, Suite 200
Farmington Hills, MI 48334
(248) 539-1330
morris@silvermanmorris.com

Robbie Flowers
Michael Wells
Janet Whitson
Mary Washington
Bruce Goldman

Represented by:

William A. Wertheimer (P26275)
30515 Timberbrook Lane
Bingham Farms, MI 48025
Telephone: (248) 644-9200

**Michigan Council 25 of The American Federation of State, County &
Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees
(AFSCME)**

Represented by:

LOWENSTEIN SANDLER LLP
Sharon L. Levine, Esq.
Wojciech F. Jung, Esq.
Philip J. Gross, Esq.
65 Livingston Avenue
Roseland, NJ 07068
Telephone: (973) 597-2500
Facsimile: (973) 597-6247
slevine@lowenstein.com
wjung@lowenstein.com
pgross@lowenstein.com

THE SANDERS LAW FIRM PC
Herbert A. Sanders, Esq.
615 Griswold St., Suite 913
Detroit, MI 48226
Telephone: (313) 962-0099
Facsimile: (313) 962-0044
jsanders@miafscme.org

MILLER COHEN, P.L.C.
Richard G. Mack, Jr., Esq.
600 West Lafayette Boulevard
4th Floor
Detroit, MI 48226

**International Union, United Automobile, Aerospace and Agricultural
Implement Workers of America**

Represented by:

COHEN, WEISS AND SIMON LLP
Babette A. Ceccotti
Keith E. Secular
Thomas N. Ciantra
Joshua J. Ellison
330 West 42nd Street
New York, NY 10036
Telephone: (212) 563-4100
Facsimile: (212) 695-5436
bceccotti@cwsny.com

Niraj R. Ganatra (P63150)
Michael Nicholson (P33421)
8000 East Jefferson Avenue
Detroit, MI 48214
Telephone: (313) 926-5216
Facsimile: (313) 926-5240
nganatra@uaw.net
mnicholson@uaw.net

Center for Community Justice and Advocacy

Represented by:

VANESSA G. FLUKER, ESQ. PLLC
Vanessa G. Fluker, Esq. PLLC
2921 East Jefferson, Suite 200
Detroit, MI 48207
Telephone: (313) 393-6005
Facsimile: (313) 393-6007
vgflawyer@sbcglobal.net

Retired Detroit Police Members Association

Represented by:

STROBL & SHARP, P.C.
Lynn M. Brimer (P43291)
Meredith E. Taunt (P69698)
Mallory A. Field (P75289)
300 East Long Lake Road, Suite 200
Bloomfield Hills, MI 48304
Telephone: (248) 540-2300
Facsimile: (248) 645-2690
lbrimer@stroblpc.com
mtaunt@stroblpc.com
mfield@stroblpc.com

Krystal Crittendon
19737 Chesterfield
Detroit, MI 48221

The Retiree Committee of the City of Detroit

Represented by:

DENTONS US LLP
Carole Neville
1221 Avenue of the Americas
New York, New York 10020
Tel: (212) 768-6700
Fax: (212) 768-6800
carole.neville@dentons.com

DENTONS US LLP
Sam J. Alberts
1301 K Street, NW
Suite 600,
East Tower
Washington, DC 20005-3364
Telephone: (202) 408-6400
Facsimile: (202) 408-6399
sam.alberts@dentons.com

SALANS FMC SNR DENTON EUROPE LLP
Claude D. Montgomery (P29212)
Rockefeller Center
620 Fifth Avenue
New York, New York 10020
Telephone: (212) 632-8390
claude.montgomery@dentons.com

BROOKS WILKINS SHARKEY & TURCO PLLC
Matthew E. Wilkins (P56697)
Paula A. Hall (P61101)
401 South Old Woodward, Suite 400
Birmingham, Michigan 48009
Telephone: (248) 971-1711
Facsimile: (248) 971-1801
wilkins@bwst-law.com
hall@bwst-law.com

Dated: December 12, 2013

Respectfully submitted,

CLARK HILL PLC

/s/ Robert D. Gordon

Robert D. Gordon (P48627)
Shannon L. Deeby (P60242)
Jennifer K. Green (P69019)
Evan J. Feldman (P73437)
151 South Old Woodward Avenue
Suite 200
Birmingham, Michigan 48009
Telephone: (248) 988-5882
Facsimile: (248) 988-2502
rgordon@clarkhill.com

-and-

ARNOLD & PORTER LLP
Lisa Hill Fenning
777 South Figueroa Street
44th Floor
Los Angeles, California 90017
Telephone: (213) 243-4000
Facsimile: (213) 243-4199
lisa.fenning@aporter.com

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