

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
(Southern Division)**

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

**AMENDED EXHIBIT LIST OF HYPOTHEKENBANK FRANKFURT AG,
HYPOTHEKENBANK FRANKFURT INTERNATIONAL S.A., AND ERSTE
EUROPAISCHE PFANDBRIEF- UND KOMMUNALKREDITBANK
AKTIENGESELLSCHAFT IN LUXEMBURG S.A., FOR HEARING ON (A) MOTION
OF DEBTOR FOR ENTRY OF AN ORDER (I) AUTHORIZING THE ASSUMPTION OF
THAT CERTAIN FORBEARANCE AGREEMENT AND OPTIONAL TERMINATION
AGREEMENT PURSUANT TO SECTION 365(a) OF THE BANKRUPTCY CODE, (II)
APPROVING SUCH AGREEMENT PURSUANT TO RULE 9019, AND (III)
GRANTING RELATED RELIEF AND (B) THE 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 AND THE OBJECTIONS THERETO**

Hypothekenbank Frankfurt AG, Hypothekenbank Frankfurt International S.A., Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A., a Luxembourg stock corporation (collectively, “ECPK”), by their undersigned attorneys, hereby file this Amended Exhibit List for Hearing on (a) the Motion of Debtor for Entry of an Order (I) Authorizing the Assumption of that Certain Forbearance Agreement and Optional Termination Agreement Pursuant to Section 365(a) of the Bankruptcy Code, (II) Approving Such Agreement Pursuant to Rule 9019, and (III) Granting Related Relief (Docket No. 157) and (B) the 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 and the

Objections Thereto (Docket No. 1520) (collectively, the “Motions”). This Amended Exhibit List is being submitted solely to conform the numbers of each exhibit with system for numbering exhibits suggested by the Court at the pre-trial conference on December 13, 2013. No other changes are made to the original Exhibit List submitted by EEPK on December 9, 2013.

EXHIBIT	DESCRIPTION
801.	Solicitation Materials to Prospective Lenders (Letter and Term Sheet) (Bates Nos. DTPFF016682-016687)
802.	Project Piston Cash Flow Forecast- Through 2017- dated September 10, 2013 (Bates Nos. DTPFF020055-020071)
803.	Email dated September 27, 2013 from Bruce Bennett (Bates No. DTPFF0516)
804.	September 16, 2013 letter from Barclays (Bates Nos. DTPFF013896-013920)
805.	Post-Petition Financing Discussion dated September 26, 2013 (Bates Nos. DTPFF020215-020225)
806.	Commitment Letter Summaries (Draft) dated October 3, 2013 (Bates Nos. DTPFF 020226-020231)
807.	Letter from Kevyn Orr to Andrew Dillon dated October 8, 2013 (Bates Nos. DTPFF0528-0529)
808.	Letter from Andrew Dillon to Kevyn Orr dated October 11, 2013 (Bates Nos. DTPFF 012928-012929)
809.	Briefing Materials for City Council dated October 7, 2013 (Bates Nos. DTPFF020039- 020071)
810.	Briefing Materials for City Council dated October 17, 2013 (Bates Nos. DTPFF012993- 013024)
811.	Briefing Materials for Financial Advisory Board (Bates Nos. DTPFF01959-01968)
812.	Emergency Manager’s Order regarding Postpetition Financing
813.	Commitment Letter

EXHIBIT	DESCRIPTION
814.	Fee Letter
815.	Bond Purchase Agreement- Quality of Life Loan
816.	Bond Purchase Agreement- Swap Termination Loan
817.	Trust Indenture
818.	Engagement Letter for Exit Financing (Bates Nos. DTPFF012973-012984)
819.	City Council Resolution
820.	Email correspondence and attachments (Bates Nos. DTPFF0162-0173)
821.	Correspondence to Local Emergency Financial Assistance Loan Board dated November 6, 2013, and enclosures (Bates Nos. DTPFF20232-20356)

EEPK may also introduce or rely upon portions of the deposition transcripts of Charles Moore, James Doak, Kevyn Orr, Kenneth Buckfire, and Guarav Maholtra for purposes of impeachment, to the extent such witnesses are not available, or to the extent the City does not call such witnesses to testify at the hearing on the Motions.

EEPK further reserves the right (a) to introduce exhibits not included in this Exhibit List as rebuttal to any testimony or evidence presented by the City, and (b) to use or rely upon exhibits (i) introduced by the City as part of its case in chief and (ii) exhibits identified or introduced by any other creditor or party in interest that has objected to the Motions. By reserving the right to use or rely upon exhibits introduced by the City or by an other creditor or party in interest that has objected to the Motions, EEPK does not waive any objections to admissibility on any grounds.

Because discovery is ongoing and depositions have not been completed, EEPK reserves the right to amend, supplement, or modify this Exhibit List.

December 14, 2013.

Respectfully submitted,

/s/ Matthew G. Summers

Matthew G. Summers, Esquire
Ballard Spahr LLP
919 North Market Street, 11th Floor
Wilmington, Delaware 19801
Tel: (302) 252-4428
Fax: (302) 252-4466
E-mail: summersm@ballardspahr.com

Vincent J. Marriott, III, Esquire
Ballard Spahr LLP
1735 Market Street, 51st Floor
Philadelphia, Pennsylvania 19103
Tel: (215) 864-8236
Fax: (215) 864-9762
E-mail: marriott@ballardspahr.com

-and-

Howard S. Sher, Esquire (P38337)
Jacob & Weingarten, P.C.
Somerset Place
2301 W. Big Beaver Road, Suite 777
Troy, Michigan 48084
Tel: (248) 649-1200
Fax: (248) 649-2920
E-mail: howard@jacobweingarten.com

*Attorneys for Hypothekenbank Frankfurt AG,
Hypothekenbank Frankfurt International S.A., Erste
Europäische Pfandbrief- und Kommunalkreditbank
Aktiengesellschaft in Luxemburg S.A.*

CERTIFICATE OF SERVICE

I, Matthew G. Summers, state that on December 14, 2013, I filed a copy of the foregoing Amended Exhibit List with the Clerk of Court using the Court's ECF system and I hereby certify that the Court's ECF system has served all registered users that have appeared in the above-captioned case. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

/s/ Matthew G. Summers _____

Matthew G. Summers

E-mail: summersm@ballardspahr.com