

THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN **FILED**
SOUTHERN DIVISION

2013 JUL 30 P 1: 30

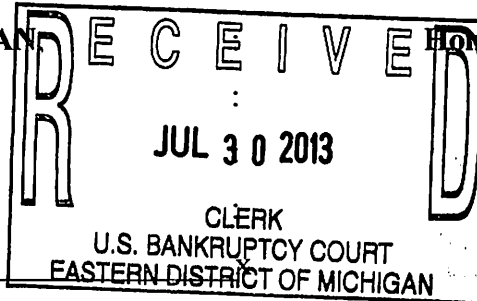
In re:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9
CLERK
U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
DETROIT

Hon. Steven W. Rhodes



PETITIONER ROBERT DAVIS' EX PARTE MOTION TO FILE BY TRADITIONAL PAPER FILING

PETITIONER, ROBERT DAVIS, by and through his attorney, ANDREW A. PATERSON, submits this, his *Ex Parte* Motion to File by Traditional Paper Filing in accordance with ECF Procedure 3(b), and states as follows:

1. On July 23, 2013, this Court entered its Order allowing for emergency motions only, to be filed by traditional paper filings, if the attorney for the party of interest was not registered and had not taken the seminar for ECF. (See Docket #65).
2. Petitioner Robert Davis ("Petitioner") desires to file with this Court an Emergency Motion for Clarification of this Court's July 25, 2013 Order that extended the stay to certain pending lawsuits pending in Ingham County Circuit Court, for the reason that his civil lawsuit has been adversely affected by the Michigan Attorney General's interpretation of this Court's July 25, 2013 Order.
3. Petitioner's attorney is currently not registered on the bankruptcy court's ECF's system, however, in accordance with this Court's July 23, 2013 Order, Petitioner's attorney quickly scheduled to take the mandatory seminar and is currently scheduled to take the

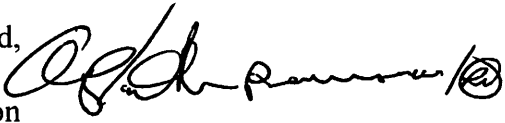
seminar on Thursday, August 1, 2013. However, this matter needs to be addressed by this Court prior to Petitioner's counsel taking the seminar to be properly registered for the ECF for this Court, considering Petitioner's Open Meetings Act lawsuit has been stalled as a result of the Michigan Attorney General's flawed interpretation of this Court's July 25, 2013 Order.

4. In spite of the fact that Petitioner's Open Meetings Act lawsuit, Ingham County Case No. 13-281-NZ, was **not** included in the Debtor's Motion as one of the "Prepetition Lawsuits," or in this Court's July 25, 2013 Order that the Chapter 9 Stay applied to, the Michigan Attorney General's office, nonetheless, notified Ingham County Circuit Court Judge William E. Collette ("Judge Collette") and informed him that it was their belief that this Court's July 25, 2013 Order did apply to Petitioner's Open Meetings Act lawsuit currently pending before him.
5. As is discussed more thoroughly in Petitioner's emergency motion, Petitioner's Open Meetings Act lawsuit has absolutely nothing to do with the pending bankruptcy proceedings currently pending before this Court, and will have no impact on such proceedings.

CONCLUSION

For these reasons, this Court should grant Petitioner's *Ex Parte* Motion to File by Traditional Paper Filing so that the merits of Petitioner's emergency motion can be adjudicated in an expeditious manner.

Respectfully submitted,


/S/ Andrew A. Paterson
ANDREW A. PATERSON (P18690)
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Novi, MI 48374
(248) 645-0759

DATED; July 29, 2013

**THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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

**ORDER GRANTING PETITIONER ROBERT DAVIS' *EX PARTE* MOTION TO FILE
BY TRADITIONAL PAPER FILING**

This matter coming before the Court on the *ex parte* motion of Petitioner Robert Davis (“Petitioner”) for entry of an order granting Petitioner the right to file by traditional paper filing his Emergency Motion for Clarification of the Court’s July 25, 2013 Stay Order; the Court having reviewed Petitioner Robert Davis’ *ex parte* motion and the Court having determined that the legal and factual bases set forth in the motion establish just cause for the relief granted herein:

IT IS HEREBY ORDERED THAT:

1. Petitioner Robert Davis’ motion is GRANTED.
2. The Clerk of the Court is to receive, file and docket Petitioner Robert Davis’
Emergency Motion for Clarification of the Court’s July 25, 2013 Stay Order.
3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

Hon. Steven W. Rhodes