

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

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

**THE CITY OF DETROIT’S POST-HEARING SUBMISSION REGARDING
EXPEDITION OF APPEAL TO THE SIXTH CIRCUIT**

In the City of Detroit’s Opposition to Immediate Appeal and Statement Regarding Certification to the Sixth Circuit, the City stated its position that an appeal of the Eligibility Ruling should occur in the ordinary course, following the City’s continued efforts to reach agreement with its creditors. In addition, the City stated that if the Court decides an appeal is appropriate at this time, then the City supports certification to the Sixth Circuit.

Yesterday, the Court asked the City its position on expediting the appeal once in the Sixth Circuit. Consistent with the City’s stated position that the appeal should proceed in the ordinary course, the City does not support expediting the appeal. The City believes that expediting the appeal could adversely affect the efforts of the City to negotiate a consensual plan through the mediation process and otherwise.

Dated: December 17, 2013

Respectfully submitted,

/s/ David G. Heiman

David G. Heiman (OH 0038271)
Heather Lennox (OH 0059649)
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
dgheiman@jonesday.com
hlennox@jonesday.com

Bruce Bennett (CA 105430)
JONES DAY
555 South Flower Street
Fiftieth Floor
Los Angeles, California 90071
Telephone: (213) 243-2382
Facsimile: (213) 243-2539
bbennett@jonesday.com

Jonathan S. Green (MI P33140)
Stephen S. LaPlante (MI P48063)
MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.
150 West Jefferson
Suite 2500
Detroit, Michigan 48226
Telephone: (313) 963-6420
Facsimile: (313) 496-7500
green@millercanfield.com
laplante@millercanfield.com

ATTORNEYS FOR THE CITY

CERTIFICATE OF SERVICE

I, David G. Heiman, hereby certify that the foregoing Post-Hearing Submission Regarding Expedition of Appeal to the Sixth Circuit was filed and served via the Court's electronic case filing and noticing system on this 17th day of December, 2013.

/s/ David G. Heiman