

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

IN RE:  
CITY OF DETROIT, MICHIGAN,

Debtor.

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Case no. 13-53846  
Chapter 9  
Hon. Steven W. Rhodes

NOTICE OF APPEARANCE AND REQUEST TO BE  
ADDED TO MATRIX AND RESERVATION OF RIGHTS

To: Clerk, U.S. Bankruptcy Court

**PLEASE TAKE NOTICE:**

1. Plunkett Cooney represents Waste Management, Inc. ("Client"), a party in interest in this case.

2. The undersigned firm enters its appearances and under Bankruptcy Rule 2002 requests that it be added to the matrix and that copies of all notices given or requested to be given in this case and all papers served in this case be given and served on the undersigned.

3. The foregoing request includes not only notices and papers referred to in Bankruptcy Rule 2002, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, any plan, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by hand delivery, mail, telephone, telex or otherwise which affects Debtor or the property of Debtor. All such notices and pleadings should be sent to counsel and local counsel addressed as follows:

David A. Lerner  
Plunkett Cooney  
38505 Woodward Avenue  
Suite 2000  
Bloomfield Hills, MI 48304

4. Neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive (a) Clients' right to have final orders in non-core matters entered only after de novo review by a District Judge, (b) Clients' right to trial by jury in any proceeding so triable in this case or in any case, controversy, or proceeding related to this case, (c) Clients' right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (d) any other rights, claims, actions, setoffs, or recoupments or remedies to which Clients are or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, recoupments and remedies Clients expressly reserve.

Respectfully submitted,

Plunkett Cooney

By: /s/DAVID A. LERNER  
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Dated: July 31, 2013

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