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
	· : Y

CITY OF DETROIT'S STATEMENT REGARDING THE UAW'S AND THE FLOWERS PLAINTIFFS' DESIGNATION OF THE CONTENTS OF THE RECORD AND STATEMENT OF ISSUES ON APPEAL

The City of Detroit ("City") is the Debtor in this chapter 9 case and appellee with respect to the *Notice of Appeal* filed by the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America ("UAW") and Robbie Flowers, Michael Wells, Janet Whitson, Mary Washington and Bruce Goldman, as plaintiffs in the suit *Flowers v. Snyder*, No. 13-729 CZ (Ingham County Circuit Court) ("*Flowers* Plaintiffs) (collectively, "Appellants") [Docket No. 2165] to challenge the Court's *Opinion Regarding Eligibility* [Docket No. 1945] and *Order for Relief Under Chapter 9 of the Bankruptcy Code* [Docket No. 1946]. The City states that it filed its counter-designation of the record and counter-statement of the issues pursuant to Rule 8006 of the Federal Rules of

Bankruptcy Procedure in response to the Appellants' *Statement of Issues to be Presented on Appeal* [Docket No. 2257] and *Appellants' Designation of Items to be Included in the Record on Appeal* [Docket No. 2276] on January 2, 2014, at Docket

No. 2361, which is incorporated herein by reference.

Dated: January 3, 2014 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

Robert S. Hertzberg (P30261) Deborah Kovsky-Apap (P68258) Pepper Hamilton LLP 4000 Town Center, Suite 1800 Southfield, MI 48075 (248) 359-7300 - Telephone (248) 359-7700 - Fax hertzbergr@pepperlaw.com kovskyd@pepperlaw.com

ATTORNEYS FOR THE CITY

Certificate of Service

I, David G. Heiman, hereby certify that the foregoing CITY OF DETROIT'S STATEMENT REGARDING THE UAW'S AND THE FLOWERS PLAINTIFFS' DESIGNATION OF THE CONTENTS OF THE RECORD AND STATEMENT OF ISSUES ON APPEAL was filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this manner on this 3rd day of January 2014.

/s/ David G. Heiman

David G. Heiman