

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

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

**CITY OF DETROIT’S STATEMENT REGARDING THE RETIREE
ASSOCIATION PARTIES’ 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 Retired Detroit Police & Fire Fighters Association (“RDPFFA”), Donald Taylor, individually and as President of the RDPFFA, the Detroit Retired City Employees Association (“DRCEA”), and Shirley V. Lightsey, individually and as President of the DRCEA (collectively, the “Retiree Association Parties”) [Docket No. 2070] 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 *Designation by*

Retiree Association Parties of Record on Appeal [Docket No. 2300] and the
Statement by Retiree Association Parties of Issues on Appeal [Docket No. 2301] on
January 2, 2014, at Docket No. 2361, which is incorporated herein by reference.

Dated: January 6, 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 RETIREE ASSOCIATION PARTIES' 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 6th day of January 2014.

/s/ David G. Heiman_____

David G. Heiman