

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

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In re : Chapter 9
: :
CITY OF DETROIT, MICHIGAN, : Case No. 13-53846
: :
Debtor. : Hon. Steven W. Rhodes
: :
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**DEBTOR'S OBJECTION TO CORRECTED MOTION
OF OFFICIAL COMMITTEE OF RETIREES FOR ENTRY OF
AN ORDER ALLOWING AN ADMINISTRATIVE EXPENSE CLAIM**

The City of Detroit (the "City") hereby objects to the Corrected Motion of Official Committee of Retirees for Entry of an Order Allowing an Administrative Expense Claim (Docket No. 2660) (the "Motion")¹ filed by the Official Committee of Retirees (the "Committee") appointed in the City's chapter 9 case. In support of this Objection, the City respectfully represents as follows:

Objection

By the Motion, the Committee seeks the allowance of a total of \$602,250 (the "Policy Premium") as an administrative expense under

¹ The Motion originally was filed as docket number 2656 on February 6, 2014 but was refiled under the correct ECF event code as docket number 2660 on February 7, 2014.

section 503(b)(3)(F) of title 11 of the United States Code (the "Bankruptcy Code") for the Committee to purchase errors and omissions insurance coverage for its members. As set forth in the Brief in Opposition to Corrected Motion of Official Committee of Retirees for Entry of an Order Allowing an Administrative Expense Claim (the "Brief in Opposition") filed contemporaneously herewith, the Motion should be denied because (a) the City has not consented to pay the Policy Premium and (b) the insurance coverage is not an actual, necessary expense of the Committee members under section 503(b)(3)(F) of the Bankruptcy Code.

WHEREFORE, for the reasons set forth herein and in the Brief in Opposition, the City respectfully requests that this Court: (i) deny the Motion; and (ii) grant such other and further relief to the City as the Court may deem proper.

Dated: February 20, 2014

Respectfully submitted,

/s/ Heather Lennox

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ATTORNEYS FOR THE CITY

CERTIFICATE OF SERVICE

I, Heather Lennox, hereby certify that the foregoing Debtor's Objection to Corrected Motion of Official Committee of Retirees for Entry of an Order Allowing an Administrative Expense Claim was filed and served via the Court's electronic case filing and noticing system on this 20th day of February, 2014.

/s/ Heather Lennox _____