

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re  
CITY OF DETROIT, MICHIGAN,  
Debtor

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

**OBJECTIONS TO THE PETITION FILED BY ONE KEVYN D. ORR SEEKING TO  
COMMENCE A CASE UNDER CHAPTER 9 OF TITLE 11 OF THE UNITED STATES  
CODE ON BEHALF OF THE CITY OF DETROIT, MICHIGAN**

I, Deborah DeLaMoore (dob: 10-6-50), received a notice by mail on or about Aug 18, 2013, identifying me as possible creditor or interested party in the above captioned matter. In response to said notice, I do hereby file objections to the petition filed by Kevyn D. Orr, seeking to commence a case under Chapter 9 of the U.S. Bankruptcy Code on behalf of the City of Detroit, Michigan, and in support of said objections, I state the following:

**OBJECTIONS**

1. I am a creditor or interested party in the purported bankruptcy filed by Kevyn D. Orr.
2. Pursuant to Michigan Public Act 436 of 2012, Kevyn Orr was appointed emergency manager of City of Detroit by Michigan Governor, Rick Snyder on or about February 22, 2013.
3. Kevyn Orr filed this pending petition for bankruptcy on behalf of the City of Detroit Michigan; however, there is no provision in Chapter 9, that gives Kevyn Orr the authority to file this petition.
4. Under Chapter 9 only the duly elected representatives of the City of Detroit have power and authority to file such a petition. Kevyn Orr is an agent of the State of Michigan, whose relationship to the City of Detroit is that of an interested party.
5. To allow an agent of the State of Michigan to take the City of Detroit into Chapter 9 bankruptcy without consent from the duly elected representatives of the City of Detroit, is tantamount to an involuntary bankruptcy, which is not allowed under Chapter 9.
6. There are several civil matters pending in the United States District Court which preceded the bankruptcy action which challenge whether the emergency manager laws in the State of Michigan, including Public Act 436 of 2012, are constitutional and this Court either does not, or may not, have jurisdiction over these matters.
7. The captioned bankruptcy proceedings should be stayed and this Honorable Court should formally request expedited consideration of all pending litigation raising legal and

U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN - DETROIT  
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constitutional challenges to the underlying authority of Governor Rick Snyder, Treasurer Andy Dillon, the State of Michigan, Emergency Manager Kevyn Orr and Restructuring Counsel Jones Day before proceeding with the bankruptcy case.

8. This Notice provides inadequate notice and opportunity to be heard by the date of August 19, 2013 when objections may be filed, as the Notice was received less than two (2) weeks before the date by which Objections must be filed.
9. Proceeding with the bankruptcy proceeding before the constitutionality of Public Act 436 is determined would exceed the lawful jurisdiction and purposes of bankruptcy under Chapter 9 and unjustly prejudice the rights of Detroit residents, including but not limited to the named plaintiffs in the pending litigation, creditors and interested parties.
10. The issues of authority and constitutionality of Public Act 436 should be resolved prior to the bankruptcy matter to avoid unlawful and unconstitutional extension of the jurisdiction and authority of the bankruptcy court under Article III of the United States Constitution.
11. For the foregoing reasons, this petition is not allowable under Chapter 9 and must be dismissed.

Respectfully submitted,

Deborah Lela Moore, EL ©  
name

Interested Party/Creditor

[4436] Lemay Road  
Detroit, Michigan Republic

Address

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
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COMMENCE A CASE UNDER CHAPTER 9 OF TITLE 11 OF THE UNITED STATES  
CODE ON BEHALF OF THE CITY OF DETROIT, MICHIGAN**

**PROOF OF SERVICE**

I hereby assert that on August 19, 2013, I filed the above Objections to the Petition Filed by One Kevyn D. Orr Seeking to Commence a Case Under Chapter 9 of Title 11 of the United States Bankruptcy Code on Behalf of the City of Detroit and served said Objections upon the following parties of record via United States Mail.

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*Deborah Lela Moore, Esq. ©*  
\_\_\_\_\_  
Name

Counsel to the Debtor  
David G. Heiman, Esq.  
Heather Lennox, Esq.  
Jones Day  
North Point  
901 Lakeside Avenue  
Cleveland, OH 44114-1190  
T: (216) 586-3939  
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Counsel to the Debtor  
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1420 Peachtree Street, NE  
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**Counsel to the Debtor**

**Bruce Bennett, Esq.**

**Jones Day**

**555 South Flower Street**

**Fiftieth Floor**

**Los Angeles, CA 90071**

**T: (213) 489-3939**

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**Local Counsel to the Debtor**

**Jonathan S. Green, Esq.**

**Stephen S. LaPlante, Esq.**

**Miller, Canfield, Paddock & Stone, P.L.C.**

**150 West Jefferson**

**Suite 2500**

**Detroit, MI 48226**

**T: (313) 963-6420**

**F: (313) 496-7500**

**<http://www.millercanfield.com>**

**Office of the United States Trustee**

**U.S. Department of Justice**

**211 West Fort Street**

**Suite 700**

**Detroit, MI 48226**

**T: (313) 226-7999**

**F: (313) 226-7952**

**<http://www.justice.gov/ust/r09>**

**DATED: August 19, 2013**

Bernard J. Youngblood  
Wayne County Register of Deeds  
November 01, 2012 11:21 AM  
Inst:2012425417 FXF Pages:19  
Liber:50246 Page:842

United States  
Bankruptcy Court  
Eastern District  
Division  
case # 13-53846

**UCC FINANCING STATEMENT**

FOLLOW INSTRUCTIONS (front and back) CAREFULLY

A. NAME & PHONE OF CONTACT AT FILER [optional]

B. SEND ACKNOWLEDGMENT TO: (Name and Address)

Deborah Moore, El  
c/o: [4436] Lemay Road  
non-domestic mail  
Detroit, Michigan Republic  
[zip code exempt]

THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY

1. DEBTOR'S EXACT FULL LEGAL NAME - insert only one debtor name (1a or 1b) - do not abbreviate or combine names

1a. ORGANIZATION'S NAME <b>AHMOSE MATH CENTER</b>			
OR	1b. INDIVIDUAL'S LAST NAME		FIRST NAME
1c. MAILING ADDRESS <b>320 MACK AVENUE</b>		CITY <b>DETROIT</b>	STATE <b>MI.</b>
		POSTAL CODE <b>48201</b>	COUNTRY <b>USA</b>
1d. SEE INSTRUCTIONS	ADD'L INFO RE ORGANIZATION DEBTOR	1e. TYPE OF ORGANIZATION <b>Moorish Empire</b>	1f. JURISDICTION OF ORGANIZATION <b>Treaty: Peace &amp; Friendship 244-</b>
			1g. ORGANIZATIONAL ID #, if any <b>UN #208/1999, #AA222141</b> <input type="checkbox"/> NONE

2. ADDITIONAL DEBTOR'S EXACT FULL LEGAL NAME - insert only one debtor name (2a or 2b) - do not abbreviate or combine names

2a. ORGANIZATION'S NAME			
OR	2b. INDIVIDUAL'S LAST NAME <b>MOORE</b>		FIRST NAME <b>DEBORAH</b>
2c. MAILING ADDRESS <b>4436 Lemay Street</b>		CITY <b>Detroit</b>	STATE <b>MI.</b>
		POSTAL CODE <b>48214</b>	COUNTRY <b>USA</b>
2d. SEE INSTRUCTIONS	ADD'L INFO RE ORGANIZATION DEBTOR	2e. TYPE OF ORGANIZATION <b>LEGAL FICTION</b>	2f. JURISDICTION OF ORGANIZATION <b>equity, Mich. Compiled Law</b>
			2g. ORGANIZATIONAL ID #, if any <b>14th. amendment citizen</b> <input type="checkbox"/> NONE

3. SECURED PARTY'S NAME (or NAME of TOTAL ASSIGNEE of ASSIGNOR S/P) - insert only one secured party name (3a or 3b)

3a. ORGANIZATION'S NAME			
OR	3b. INDIVIDUAL'S LAST NAME <b>Moore</b>		FIRST NAME <b>Deborah</b>
3c. MAILING ADDRESS <b>c/o: [4436] Lemay Road</b>		CITY <b>Detroit</b>	MIDDLE NAME <b>Lela</b>
		STATE <b>Mich.</b>	SUFFIX <b>El</b>
		POSTAL CODE <b>[zip code exempt]</b>	COUNTRY <b>U.S.Repl.</b>

4. This FINANCING STATEMENT covers the following collateral:

**NOTICE TO THE PUBLIC  
SEE ATTACHMENTS**

- Exhibit A - Surety Bond # 0- - - - - 6421(1)
- Exhibit B - Bill of Exchange
- Exhibit C - Power of Attorney
- Exhibit D - Copyright Notice
- Exhibit E - Declaration of Lawful Standing
- Exhibit F - Security Agreement
- Exhibit G - Deed 320 Mack

5. ALTERNATIVE DESIGNATION (if applicable):	LESSEE/LESSOR	CONSIGNEE/CONSIGNOR	BAILEE/BAI-LOR	SELLER/BUYER	AG. LIEN	NON-UCC FILING
6. <input checked="" type="checkbox"/> This FINANCING STATEMENT is to be filed (for record) (or recorded) in the REAL ESTATE RECORDS. Attach Addendum (if applicable)	7. Check to REQUEST SEARCH REPORT(S) on Debtor(s) (optional)		All Debtors	Debtor 1	Debtor 2	
8. OPTIONAL FILER REFERENCE DATA						

*Deborah Lela Moore, El*

**AFFIDAVIT of REHABILITATION and OCCUPATION**

For the record, on the record, to let the record show that Deborah Lela Moore, EI© is a natural woman, living being and over the age of 21 is competent to state the facts herein. She is not a corporation nor a legal fiction but is a flesh and blood sentient being. I do hereby claim interest on the following property at the corner of East Vernor Highway & Lillibridge resulting from the rehabilitation and occupation commenced on the said properties in 2010 and continuing throughout 2013. I do hereby state the following facts to be true and correct having first hand knowledge of the facts herein.

Deborah Lela Moore, EI© and work crew performed rehabilitation on the properties of Lillibridge at 2261 and 2265. Rehab and maintenance included but was not limited to the following activities on said properties:

Install roof tarp	stabilized front porch	<u>SUPPLIES PURCHASED</u>
remove old tarp	landscape	roofing nails
Cut brushes-front	cut tree stubs	wood nails
Removal of outside debris	measurements	30 x 50 tarp
Painted ceiling front room	prep for Public Works pickup	cleaning supplies
Repair plywood front window	Wayne Co. Regis. Deeds research	2 x 4 wood beams (2)
Board up windows 1 <sup>st</sup> & 2 <sup>nd</sup> fl.	Scrape paint front room	gasoline
Board up doors front, back, side	cut grass 2265 lot	hand saws (2)
Security check int. & ext. perimeter	banister install-front porch	white oil base paint
Install locks, front, side back doors	bottom panel-front porch	paint brush
Paint front door		brick caulking (2)
Call DWSD water main shutoff		50lb. cement bags (2)
		20 x 30 tarp
Total cost \$ <u>25,000</u>		Total cost \$ <u>2,000</u>

\_\_\_\_\_  
Signature-without prejudice

Deborah Lela Moore, EI©

Print

Date: August 19, 2013

Co Will  
witness 1, signature

\_\_\_\_\_  
witness 2, signature

NOTARY PUBLIC Subscribed and sworn to in county of \_\_\_\_\_

STATE OF MICHIGAN before me this \_\_\_\_\_ day of \_\_\_\_\_ A.D., 2013

} ss jurat My commission expires \_\_\_\_\_

COUNTY OF WAYNE

Witness my hand and official seal.

\_\_\_\_\_  
Signature of Notary or DeJure