

**UNITED STATES BANKRUPTCY COURT  
FOR THE 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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**JOINDER OF LOCAL 324, INTERNATIONAL UNION OF OPERATING ENGINEERS  
AS INTERESTED PARTY TO OBJECTIONS TO DETROIT’S ELIGIBILITY FOR  
RELIEF UNDER SECTIONS 109(c) AND 921(c) OF THE BANKRUPTCY CODE**

Local 324, International Union of Operating Engineers (“Local 324”) hereby joins and objects to the City of Detroit’s eligibility for an order or relief under chapter 9 of the U.S. Bankruptcy Code and adopts by reference hereto the arguments contained in, and documents appended to, the Objections To the City of Detroit’s Eligibility for an Order for Relief Under Sections 109(c) and 921(c) of the Bankruptcy Code filed by International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (“UAW”) and the Objection filed by Counsel 25, American Federation of State, City, and Municipal Employees (“AFSCME”). In support of this joinder, Local 324 states the following:

1. Local 324 is a labor organization headquartered in Bloomfield Township, Michigan and represents approximately one-hundred and four (104) City of Detroit employees in various departments including the Water and Sewerage Department, Parks and Recreation Department, and employees in various positions throughout the City.

2. Over the past year, Local 324 has joined with other labor organizations representing the City of Detroit employees to press for solutions that reflect fair and democratic

participation by the City's stakeholders. During the prepetition period, the City consistently and continuously refused to engage in any bargaining with representatives of Local 324, and presented its proposals only on "take it or leave it" basis.

3. As an interested party, Local 324 reserves the right to be heard during any argument or status conference concerning the City's eligibility for bankruptcy relief and all other related matters.

WHEREFORE, for the foregoing reasons, Local 324 joins in UAW's and AFSCME's Objections and requests that the City of Detroit's Chapter 9 Petition be dismissed.

Respectfully submitted,

SACHS WALDMAN, P.C.

*/s/ Andrew Nickelhoff*

Andrew Nickelhoff (P37990)

Mami Kato (P74237)

*Attorneys for IUOE, Local 324*

2211 East Jefferson Avenue, Suite 200

Detroit, Michigan 48207

Tel: (313) 496-9429

Fax: (313) 965-4602

[anickelhoff@sachswaldman.com](mailto:anickelhoff@sachswaldman.com)

[mkato@sachswaldman.com](mailto:mkato@sachswaldman.com)

Dated: August 19, 2013

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**CERTIFICATE OF SERVICE**

I, Mami Kato, being first duly sworn, hereby certify that on August 19, 2013, I electronically filed **Joinder of Local 324, International Union of Operating Engineers as Interested Party to Objections to Detroit’s Eligibility for Relief Under Sections 109(c) and 921(c) of the Bankruptcy Code** and this **Certificate of Service** with the Clerk of the Court through the Court’s CM/ECF system which will provide notice and service of such documents upon the parties through counsel of record.

SACHS WALDMAN, P.C.

/s/ Mami Kato  
Mami Kato (P74237)  
*Attorneys for IUOE, Local 324*  
2211 East Jefferson Avenue, Suite 200  
Detroit, MI 4807  
Tel: (313) 496-9420  
Fax: (313) 965-4602  
[mkato@sachswaldman.com](mailto:mkato@sachswaldman.com)

Date: August 19, 2013