

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN

In re:

CITY OF DETROIT, MICHIGAN

Case No. 13-53846

Chapter 9

Hon. STEVEN W. RHODES

Debtor ___/

OBJECTION TO ELIGIBILITY OF CITY OF DETROIT FOR CHAPTER 9
FILED BY MICHIGAN AUTO RECOVERY, INC.

Michigan Auto Recovery, Inc. comes by its Counsel, KURT THORNBLADH P25858, and for its Objection to Eligibility of the City of Detroit for Chapter 9 says as follows:

1. The City of Detroit filed a petition for relief under Chapter 9 of the U.S. Bankruptcy Court on July 18, 2013.
2. Michigan Auto Recovery Service, Inc. is a creditor of the City of Detroit, Michigan and has a claim for over \$300,000 for towing services performed for the City.
3. Michigan Auto Recovery, Inc. was not given a fair opportunity to negotiate its claim prior to the filing of Chapter 9 by the City of Detroit.
4. Michigan Auto Recovery Service, Inc. challenges the eligibility of the City of Detroit for Chapter 9 pursuant to 11 USC § 108(c)(5)(B).
5. There are 27 contract towers for the City of Detroit, and on information and belief, the City of Detroit has failed to negotiate in good faith with the towers prior to filing this case.

Wherefore Michigan Auto Recovery Service, Inc prays the Court will dismiss the Bankruptcy of The City of Detroit, Michigan.

FOR MICHIGAN AUTO RECOVERY SERVICE,
Inc.

By: ___/s/ kurt thornbladh_____

KURT THORNBLADH P25858

Thornbladh Legal Group PLLC

7301 Schaefer

Dearborn, MI 48126

(313) 943 2678

kthornbladh@gmail.com

Dated: August 19, 2013

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN

In re:

CITY OF DETROIT, MICHIGAN

Case No. 13-53846

Chapter 9

Hon. STEVEN W. RHODES

Debtor ___ /

CERTIFICATE OF SERVICE

Kurt Thornbladh certifies and says that on August 19, 2013 he served copies of Objection to Eligibility of the City of Detroit, Michigan to file Chapter 9 as follows:

1. The following were served by electronic notification:

Carla Orman Andres candres@gklaw.com Mark A. Angelov mark.angelov@arentfox.com
Charles N. Ash cash@wnj.com, kkranz@wnj.com Karin F. Avery Avery@SilvermanMorris.com
Jason W. Bank jbank@kerr-russell.com Paige E. Barr Paige.Barr@kattenlaw.com Kevin M.
Baum kevin.baum@kattenlaw.com Dirk H. Beckwith dbeckwith@fosterswift.com Michael R.
Bell BellM1@michigan.gov Ryan Blaine Bennett ryan.bennett@kirkland.com Douglas C.
Bernstein dbernstein@plunkettcooney.com,
dtupper@plunkettcooney.com; ssherbow@plunkettcooney.com Brendan G. Best
bbest@schaferandweiner.com, wkyles@schaferandweiner.com Jeffrey H. Bigelman
jhb_ecf@osbig.com, tc@osbig.com William C. Blasses wcb@osbig.com Brett A. Border
bborder@sspcclegal.com, joumedian@sspcclegal.com Mark E. Bredow mbredow@resnicklaw.net,
jabelnour@resnicklaw.net Lynn M. Brimer lbrimer@strobplpc.com, kvanakin@strobplpc.com
Charles D. Bullock cbullock@sbplclaw.com, cdbullock@msn.com; lhaas@sbplclaw.com Judy B.
Calton jcalton@honigman.com Judy B. Calton
jcalton@honigman.com, blundberg@honigman.com Peter L. Canzano pcanzano@sidley.com
Julia A. Caroff julia.caroff@usdoj.gov, patti.turczynski@usdoj.gov; michele.gangler@usdoj.gov
Corey M. Carpenter bocecf@boclaw.com, coreycarpenter@boclaw.com Amy D. Caton
acaton@kramerlevin.com, achouprouta@kramerlevin.com Babette A. Ceccotti
bceccotti@cwsny.com Mary Beth Cobbs cobbm@detroitmi.gov, mbcobbs@flash.net Carol
Connor Cohen carol.cohen@arentfox.com Dawn R. Copley dcopley@dickinsonwright.com,
dnavin@dickinsonwright.com Sean M. Cowley (UST) Sean.cowley@usdoj.gov Elliot G.
Crowder ecrowder@sbplclaw.com, lhaas@sbplclaw.com Robert Darnell
robert.darnell@usdoj.gov Shannon L. Deeby sdeeby@clarkhill.com Melissa L. Demorest
melissa@demolaw.com, paula@demolaw.com Robert J. Diehl rdiehl@bodmanlaw.com Karen
B. Dine karen.dine@kattenlaw.com David L. Dubrow david.dubrow@arentfox.com Ethan D.
Dunn bankruptcy@maxwelldunnlaw.com, bankruptcy.maxwelldunn@gmail.com John E. Eaton
jeaton@cousenslaw.com David Eisenberg deisenberg@ermanteicher.com Earle I. Erman
eerman@ermanteicher.com Sherrie L. Farrell sfarrell@dykema.com,
mpearson@dykema.com; docket@dykema.com Evan Justin Feldman efeldman@clarkhill.com

Mallory Field MField@stroblpc.com, jmckeogh@stroblpc.com Deborah L. Fish
dfish@allardfishpc.com, allardfishpc@yahoo.com Steven B. Flancher flanchers@michigan.gov
Vanessa G. Fluker vgflawyer@sbcglobal.net, dfjohnson@cfaith.com Mark S. Frankel
mfrankel@couzens.com Brendan H. Frey bfrey@manteselaw.com,
ssikorski@manteselaw.com;gmantese@manteselaw.com Joshua A. Gadharf
jgadharf@mcdonaldhopkins.com Niraj R. Ganatra Nganatra@uaw.net Andrew J. Gerdes
agerdes@gerdesplc.com,wwkannel@mintz.com,awalker@mintz.com, ajg-ecf@hotmail.com
Jerome D. Goldberg apclawyer@sbcglobal.net Robert D. Gordon rgordon@clarkhill.com,
lbellguzzo@clarkhill.com Timothy R. Graves tgraves@allardfishpc.com,
allardfishpc@yahoo.com Jonathan S. Green green@millercanfield.com Stephen M. Gross
sgross@mcdonaldhopkins.com, shelly.harrow@gmail.com Stephen B. Grow sgrow@wnj.com,
kfrantz@wnj.com Edward J. Gudeman ejgudeman@gudemanlaw.com, ecf@gudemanlaw.com
Raymond Guzall rayguzall@attorneyguzall.com Stephen C. Hackney
stephen.hackney@kirkland.com Paul R. Hage phage@jaffelaw.com, jtravick@jaffelaw.com
Michael C. Hammer mchammer2@dickinsonwright.com Howard R. Hawkins
howard.hawkins@cwt.com,
mark.ellenberg@cwt.com;jason.jurgens@cwt.com;ellen.halstead@cwt.com David Gilbert
Heiman dgheiman@jonesday.com Robert S. Hertzberg hertzbergr@pepperlaw.com,
alexsym@pepperlaw.com;kuschj@pepperlaw.com Steven G. Howell
showell@dickinsonwright.com Patrick Warren Hunt pwhunt@kerr-russell.com Charles Bruce
Idelsohn charlesidelsohnattorney@yahoo.com, charlesID@hotmail.com Mark R. James
mrj@wvrplaw.com Michael Joseph Karwoski mjkarwoski@alumni.nd.edu Mami Kato
mkato@sachswaldman.com, pmerchak@sachswaldman.com Richardo I. Kilpatrick
ecf@kaalaw.com Samuel S. Kohn skohn@winston.com,
DocketNY@winston.com;LLarose@winston.com;SFoss@winston.com;CHardman@winston.co
m;CSchoch@winston.com;KForte@winston.com Deborah Kovsky-Apap
kovskyd@pepperlaw.com, alexsym@pepperlaw.com Kay Standridge Kress
kressk@pepperlaw.com, alexsym@pepperlaw.com Stephen S. LaPlante
laplante@millercanfield.com Patrick C. Lannen plannen@plunkettcooney.com,
mkisell@plunkettcooney.com Lawrence A. Larose llarose@winston.com Caralyce M. Lassner
ecf@lassnerlaw.com Michael S. Leib msl@maddinhauser.com, bac@maddinhauser.com Heather
Lennox hlennox@jonesday.com David A. Lerner dlerner@plunkettcooney.com,
nwinagar@plunkettcooney.com Sharon L. Levine slevine@lowenstein.com Elias T. Majoros
emajoros@glmpc.com David A. Mollicone dmollicone@dmms.com Thomas R. Morris
morris@silvermanmorris.com, marlene@silvermanmorris.com Fred Neufeld fneufeld@sycr.com
Karen Vivian Newbury knewbury@schiffhardin.com Kenneth E. Noble
kenneth.noble@kattenlaw.com, nyc.bknotices@kattenlaw.com Eric David Novetsky
enovetsky@jaffelaw.com Sandra L. O'Connor soconnor@glmpc.com Brian D. O'Keefe
bokeefe@lippittokeefe.com, TReitzloff@lippittokeefe.com Arthur O'Reilly
aoreilly@honigman.com, ahatcher@honigman.com Yuliy Osipov yotc_ecf@yahoo.com,
yo_ecf@osbig.com;tc_ecf@osbig.com Michael R. Paslay mike.paslay@wallerlaw.com,
Cathy.thomas@wallerlaw.com;Chris.cronk@wallerlaw.com;David.lemke@wallerlaw.com;Ryan.
cochran@wallerlaw.com;Courtney.rogers@wallerlaw.com;Gerald.mace@wallerlaw.com
Barbara A. Patek bpatek@ermanteicher.com Andrew A. Paterson aap43@outlook.com,
aap43law@gmail.com Ryan Plecha rplecha@lippittokeefe.com,

jgreeniajdobrzycki@lippittokeefe.com Leland Prince princel@dteenergy.com A. Stephen Ramadan steveramadan@gmail.com Kimberly Joan Robinson kim.robinson@bfkn.com Louis P. Rochkind lrochkind@jaffelaw.com, dburris@jaffelaw.com Ronald L. Rose rrose@dykema.com Jeffrey Rossman jrossman@mwe.com Edward Todd Sable tsable@honigman.com Kenneth M. Schneider ksneider@schneidermiller.com Joseph R. Sgroi jsgroi@honigman.com Howard S. Sher howard@jacobweingarten.com John P. Sieger john.sieger@kattenlaw.com William Pfeiffer Smith wsmith@mwe.com James Sprayregen james.sprayregen@kirkland.com Kevin N. Summers ksummers@dflaw.com, mmichael@psedlaw.com;ccook@dflaw.com Matthew Gernet Summers summersm@ballardspahr.com Meredith Taunt mtaunt@stroblpc.com, KVanAkin@stroblpc.com Kurt Thornbladh kthornbladh@gmail.com, thornbladh.kurt3@gmail.com Brian R. Trumbauer btrumbauer@bodmanlaw.com Suzanne L. Wahl swahl@schiffhardin.com, mosullivan@schiffhardin.com;dchapman@schiffhardin.com;lmisisian@schiffhardin.com;edocke t@schiffhardin.com Daniel J. Weiner dweiner@schaferandweiner.com Jason L. Weiner jweiner@mcdonaldhopkins.com, sharrow@mcdonaldhopkins.com William A. Wertheimer billwertheimer@gmail.com David M. Zack dmzack@mcalpinelawfirm.com, nanichols@mcalpinelawfirm.com;dwblevins@mcalpinepc.com;mrsanborn@mcalpinepc.com;rw jezdimir@mcalpinepc.com Jennifer A. Zbytowki Belveal jbelveal@honigman.com Janet M. Ziulkowski jmz@zaplc.com, ecf@zaplc.com Craig E. Zucker czucker@ermanteicher.com

2. And the parties to the attached matrix provided by the Clerk of the U.S. Bankruptcy Court were served by First Class U.S. Mail.

_____/s/_____
kurt thornbladh
KURT THORNBLADH P25858
Thornbladh Legal Group PLLC
7301 Schaefer
Dearborn, MI 48126
(313) 943 2678
kthornbladh@gmail.com

Dated: August 19, 2013