

**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
: :
: :
-----X

**CERTIFICATION OF NO RESPONSE OR OBJECTION
REGARDING MOTION OF DEBTOR, PURSUANT TO
SECTION 362(d)(1) OF THE BANKRUPTCY CODE, FOR
ENTRY OF AN ORDER LIFTING THE AUTOMATIC
STAY TO THE EXTENT NECESSARY TO PERMIT
APPEALS OF CITY PROPERTY TAX ASSESSMENTS
TO PROCEED IN THE ORDINARY COURSE (Docket No. 275)**

On August 2, 2013, the Motion of Debtor, Pursuant to Section 362(d)(1) of the Bankruptcy Code, for Entry of an Order Lifting the Automatic Stay to the Extent Necessary to Permit Appeals of City Property Tax Assessments to Proceed in the Ordinary Course (Docket No. 275) (the "Motion"), was filed with this Court and served by the City of Detroit, Michigan (the "City"), on the parties identified on the Certificate of Service (Docket No. 304) attached hereto as Exhibit A via electronic mail, facsimile and overnight mail. Attached as Exhibit 2 to the Motion was a Notice of Hearing identifying August 16, 2013 as the deadline for objections

to the Motion (the "Objection Deadline"). A copy of the Notice of Hearing is attached hereto as Exhibit B.

No response or objection to the Motion was filed with the Court by the Objection Deadline. Accordingly, pursuant to Rule 9014-1(c) of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Eastern District of Michigan, the City respectfully requests that the Court enter a final order in form attached hereto as Exhibit C (the "Proposed Order"). A blackline of the Proposed Order against the form of proposed order attached as Exhibit 1 to the Motion is attached hereto as Exhibit D.

Dated: August 20, 2013

Respectfully submitted,

/s/ Heather Lennox

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EXHIBIT A

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

In re:

Chapter 9

City of Detroit, Michigan,

Case No. 13-53846

Debtor.

Hon. Steve W. Rhodes

CERTIFICATE OF SERVICE

I, Lydia Pastor Nino, certify and say that I am employed by Kurtzman Carson Consultants LLC (KCC), the proposed claims and noticing agent for the Debtor in the above-captioned case.

On August 2, 2013, at my direction and under my supervision, employees of KCC caused to be served the following document via Email on the service list attached hereto as **Exhibit A**; via Fax on the service list attached hereto as **Exhibit B**; and via Overnight mail on the service list attached hereto as **Exhibit C**:

- **Motion of Debtor, Pursuant to Section 362(d)(1) of the Bankruptcy Code, for Entry of an Order Lifting the Automatic Stay to the Extent Necessary to Permit Appeals of City Property Tax Assessments to Proceed in the Ordinary Course [Docket No. 275]**

Dated: August 6, 2013

/s/ Lydia Pastor Nino
Lydia Pastor Nino
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EXHIBIT A

**Exhibit A
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**Exhibit A
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**Exhibit A
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Counsel to the Retired Detroit Police Members Association	Strobl & Sharp PC	Attn: Meredith E Taunt	mfield@stroblpc.com
Counsel to the Retired Detroit Police Members Association	Strobl & Sharp PC	Attn: Meredith E Taunt	mtaunt@stroblpc.com
Union Representative	Teamsters Local #214	Attn: Joseph Valenti	TL214teams@ameritech.net
City's Secured & Unsecured Bonds	The Bank of New York Mellon Trust Company, National Association, as trustee	Attn: Eduardo Rodriguez	eduardo.rodriguez@bnymellon.com
Counsel to Michigan Council 25 of the American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO	The Sanders Law Firm PC	Herbert A Sander	hsanders@miafscme.org
Counsel for Michigan Auto Recovery Service Inc	Thornbladh Legal Group PLLC	Kurt Thornbladh	kthornbladh@gmail.com
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water)	U.S. Bank National Association, as trustee, bond registrar transfer agent, paying agent, custodian and/or contract administrator	Attn: Susan T. Brown	susan.brown5@usbank.com
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water)	U.S. Bank National Association, as trustee, bond registrar transfer agent, paying agent, custodian and/or contract administrator	Attn: Susan E. Jacobsen VP	susan.jacobsen2@usbank.com
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water Bonds)	U.S. Bank National Association, as trustee, for the Detroit Sewer and Water Bonds	Attn: Lawrence J. Bell	lawrence.bell@usbank.com
Union Representative	UAW - Local # 412	Attn: John Cunningham	jcunningham@uaw.net
Union Representative	UAW - Local #212	Attn: John Cunningham	jcunningham@uaw.net
Union Representative	UAW – PAA Local #2211	Attn: Robyn Brooks	BrooR@detroitmi.gov
Union Representative	UAW – WWTP Local #2200	Attn: Laurie Stuart	mimilaurie@yahoo.com; ltownse@detroitpubliclibrary.org
Union Representative	United Auto Workers Union	Attn: Michael Nicholson & Mike Dwyer	mnicholson@uaw.net; mdwyer@uaw.net
Counsel for United States of America	Unites States Asssitant Attorney	Julia A. Caroff	julia.caroff@usdoj.gov
Union Representative	Utility Workers Union of America	Attn: James Harrison	jharrison@uwua.net
Union Representative	Utility Workers Union of America Local #488	Attn: Carl Anderson	canderson@dwsd.org
Union Representative	Utility Workers Union of America Local #504	Attn: Curlisa Jones	mcqueen@dwsd.org
Union Representative	Utility Workers Union of America Local #531	Attn: Samuel Wilson	swilson@dwsd.org
Counsel to U.S. Bank National Association (Top 20 Creditor)	Waller Lansden Dortch & Davis LLP	Attn: David E. Lemke, Esq. & Courtney Rogers	david.lemke@wallerlaw.com; courtney.rogers@wallerlaw.com
Counsel to U.S. Bank National Association (Top 20 Creditor)	Waller Lansden Dortch & Davis LLP	Michael R Paslay Ryan K Cochran	Mike.Paslay@wallerlaw.com; Ryan.Cochran@wallerlaw.com

**Exhibit A
Served via Email**

Party Description	Company	Contact	Email
Counsel for UBS AG and Merrill Lynch Capital Services, Inc.	Warner Norcross & Judd LLP	Charles N Ash Jr	cash@wnj.com
Counsel for UBS AG and Merrill Lynch Capital Services Inc	Warner Norcross & Judd LLP	Stephen B Grow Douglas A Dozeman & Charles N Ash Jr	sgrow@wnj.com; ddozeman@wnj.com; cash@wnj.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Alfredo R Perez	alfredo.perez@weil.com
Counsel to Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Attn: Gary T. Holtzer, Esq. & Alfredo R. Pérez, Esq.	gary.holtzer@weil.com; alfredo.perez@weil.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Kelly DiBlasi	kelly.dibiasi.com
Counsel for Financial Guaranty Insurance Company	Williams Williams Rattner & Plunkett PC	Ernest J Essad Jr & Mark R James	ejessad@wvrplaw.com; mrjames@wvrplaw.com
Counsel to Assured Guaranty Municipal Corporation	Winston & Strawn LLP	Attn: Lawrence A. Larose Samuel S. Kohn Carrie V. Hardman	llarose@winston.com; skohn@winston.com; chardman@winston.com
Counsel to Assured Guaranty Municipal Corporation	Winston & Strawn LLP	Sarah T. Foss	sfoss@winston.com
Interested Party	Ziulkowski & Associates, PLC	Janet M. Ziulkowski	ecf@zaplc.com

Exhibit A
Served via Email

Company	Contact	Email
Honigman Miller Schwartz and Cohn LLP	Joseph R. Sgroi	jsgroi@honigman.com
Jaffe Raitt Heuer & Weiss, PC	Eric D. Novetsky	enovetsky@jaffelaw.com
OSIPOV BIGELMAN, P.C.	William C. Blasses, Esq.	wcb@osbig.com
Resnick & Moss, P.C.	Mark Bredow, Esq.	mbredow@resnicklaw.net

EXHIBIT B

**Exhibit B
Served via Fax**

Party Description	Company	Contact	Fax
Union Representative	AFSCME Local #0457	Attn: Laurie Walker	313-965-8217
Union Representative	AFSCME Local #1642	Attn: Gina Thompson-Mitchell	313-965-8283
Counsel to Merrill Lynch Capital Service Inc.	Cadwalader Wickershame & Taft	Attn: Howard R. Hawkins, Jr., Esq. & Lary Stomfeld, Esq.	212-504-6666
Retiree Representative	Detroit Firemen's Fund Association	Attn: Kim Fett	313-961-0215
Retiree Representative	Detroit Police Benefit and Protective Association	Attn: Delbert R. Jennings, Sr.	313-870-9330
Union Representative	Detroit Police Officers Association	Attn: Mark Diaz	313-567-7875
Office of the United States Trustee	Office of the United States Trustee		313-226-7952

Exhibit B
Served via Fax

Company	Fax
Gary Segatti and Associates, PLLC	586-758-1627

EXHIBIT C

Exhibit C
Served via Overnight Mail

Party Description	Company	Contact	Address 1	Address 2	Address 3	City	State	Zip
Union Representative	AFSCME Local #0023	Attn: Robert Stokes	600 W. Lafayette, Ste. 134			Detroit	MI	48226
Union Representative	AFSCME Local #0457	Attn: Laurie Walker	600 W. Lafayette, Ste. L – 104			Detroit	MI	48226
Union Representative	AFSCME Local #1642	Attn: Gina Thompson-Mitchell	600 W. Lafayette, Ste. L – 123			Detroit	MI	48226
Retiree Representative	Detroit Firemen's Fund Association	Attn: Kim Fett	250 W. Larned Street, Suite 202			Detroit	MI	48226
Union Representative	Field Engineers Association	Attn Larry Hart	PO Box 252805			West Bloomfield	MI	48325
The Office of the Governor of the State of Michigan	Governor Rick Snyder		P.O. Box 30013			Lansing	MI	48909
Counsel for IBM Credit LLC	IBM Credit LLC	Andy Gravina	Special Handling Group MD NC317	6303 Barfield Rd NE		Atlanta	GA	30328
The City, c/o the Emergency Manager Corporation Counsel for the City of Detroit	The City of Detroit	Attn: Kevyn D. Orr, Emergency Manager	Coleman A. Young Municipal Center	2 Woodward Ave Suite 1126		Detroit	MI	48226
	The City of Detroit	Attn: Corporation Counsel	Coleman A. Young Municipal Center	2 Woodward Avenue	Fifth Floor	Detroit	MI	48226

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
Eastern District of Michigan**

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter: 9

Case No.: 13-53846

Judge: Hon. Steven W. Rhodes

Address: 2 Woodward Avenue, Suite 1126
Detroit, Michigan 48226

Last four digits of Social Security or
Employer's Tax Identification (EIN) No(s).(if any): 38-6004606

**NOTICE OF MOTION OF DEBTOR, PURSUANT TO SECTION 362(d)(1)
OF THE BANKRUPTCY CODE, FOR ENTRY OF AN ORDER LIFTING
THE AUTOMATIC STAY TO THE EXTENT NECESSARY TO PERMIT APPEALS
OF CITY PROPERTY TAX ASSESSMENTS TO PROCEED IN THE ORDINARY COURSE**

The City of Detroit, Michigan ("Detroit" or the "City") has filed papers with the Court seeking entry of an order, pursuant to section 362(d)(1) of the Bankruptcy Code, lifting the automatic stay to the extent necessary to permit appeals of City property tax assessments to proceed in the ordinary course.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, **on or by August 16, 2013**, you or your attorney must:

1. File with the court a written response or an answer, explaining your position at:¹

United States Bankruptcy Court
United States Bankruptcy Court
211 W. Fort Street, Suite 2100
Detroit, MI 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

¹ Any response or answer must comply with F. R. Civ. P. 8(b), (c) and (e).

You must also mail a copy to:

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

Bruce Bennett (CA 105430)
JONES DAY
555 South Flower Street
Fiftieth Floor
Los Angeles, California 90071
Telephone: (213) 243-2382
Facsimile: (213) 243-2539

Jonathan S. Green (MI P33140)
Stephen S. LaPlante (MI P48063)
MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.
150 West Jefferson
Suite 2500
Detroit, Michigan 48226
Telephone: (313) 963-6420
Facsimile: (313) 496-7500

2. If a response or answer is timely filed and served, the Court will schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: August 2, 2013

Respectfully submitted,

/s/ Heather Lennox

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

Jonathan S. Green (MI P33140)

Stephen S. LaPlante (MI P48063)

MILLER, CANFIELD, PADDOCK AND

STONE, P.L.C.

150 West Jefferson

Suite 2500

Detroit, Michigan 48226

Telephone: (313) 963-6420

Facsimile: (313) 496-7500

green@millercanfield.com

laplante@millercanfield.com

ATTORNEYS FOR THE CITY

EXHIBIT C

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

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

**ORDER, PURSUANT TO SECTION 362(d)(1) OF THE
BANKRUPTCY CODE, LIFTING THE AUTOMATIC STAY TO THE
EXTENT NECESSARY TO PERMIT APPEALS OF CITY PROPERTY
TAX ASSESSMENTS TO PROCEED IN THE ORDINARY COURSE**

This matter coming before the Court on the Motion of Debtor,
Pursuant to Section 362(d)(1) of the Bankruptcy Code, for Entry of an Order
Lifting the Automatic Stay to the Extent Necessary to Permit Appeals of City
Property Tax Assessments to Proceed in the Ordinary Course (Docket No. 275)
(the "Motion"),¹ filed by the City of Detroit, Michigan (the "City"); the Court
having reviewed the Motion and the Keelean Affidavit; the City having filed a
Certification of No Response with respect to the Motion with the Court; and the
Court finding that: (a) the Court has jurisdiction over this matter pursuant to

¹ Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

28 U.S.C. §§ 157 and 1334; (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b); and (c) notice of the Motion was sufficient under the circumstances; and the Court having determined that the legal and factual bases set forth in the Motion and the Keelean Affidavit establish sufficient "cause" for the relief granted herein within the meaning of section 362(d) of the Bankruptcy Code;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. Relief from the Stay is granted to the extent necessary to permit the Assessment Appeal Process to proceed in the ordinary course to determine the appeals and liquidate claim amounts, if any. For the avoidance of doubt, the Assessment Appeal Process includes any proceeding relating to real or personal property assessments, valuations, rates, special assessments, refunds, allocation or equalization, or any other proceeding brought before the Tribunals under the property tax laws of the State of Michigan or the City.
3. The Stay is lifted only to the extent necessary to allow the Assessment Appeal Process to proceed in the ordinary course and is not modified to permit collection or other activities to recover any refund, overpayment or other claim against the City.
4. This Order grants relief from the Stay only with regard to property tax appeals brought against the City, grants no relief as to any claim

brought against an officer or inhabitant of the City and does not modify, in any way, this Court's Order Pursuant to Section 105(a) of the Bankruptcy Code Extending the Chapter 9 Stay to Certain (a) State Entities, (b) Non-Officer Employees and (c) agents and Representatives of the Debtor (Docket No. 166), entered on July 25, 2013.

5. This Order shall not be stayed pursuant to Rule 4001(a)(3) of the Federal Rules of Bankruptcy Procedure 4001(a)(3) and shall be effective immediately.

EXHIBIT D

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

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

**ORDER, PURSUANT TO SECTION 362(d)(1) OF THE
BANKRUPTCY CODE, LIFTING THE AUTOMATIC STAY TO THE
EXTENT NECESSARY TO PERMIT APPEALS OF CITY PROPERTY
TAX ASSESSMENTS TO PROCEED IN THE ORDINARY COURSE**

This matter coming before the Court on the Motion of Debtor, Pursuant to Section 362(d)(1) of the Bankruptcy Code, for Entry of an Order Lifting the Automatic Stay to the Extent Necessary to Permit Appeals of City Property Tax Assessments to Proceed in the Ordinary Course, [\(Docket No. 275\)](#) (the "Motion"),¹ filed by the City of Detroit, Michigan (the "City"); the Court having reviewed the Motion, [and](#) the Keelean Affidavit ~~and~~ [the City](#) having ~~considered the statements of counsel and the evidence adduced~~ [filed a Certification of No Response](#) with respect to the Motion ~~at a hearing before~~ [with](#) the Court ~~(the "Hearing")~~; and the Court finding that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b); [and](#) (c) notice of the Motion ~~and the Hearing~~ was sufficient under the circumstances; ~~and (d)~~ and the Court having determined that the legal and factual bases set forth in the Motion, [and](#) the Keelean Affidavit ~~and at the Hearing~~ establish sufficient "cause" for the relief granted herein within the meaning of section 362(d) of the Bankruptcy Code;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

¹ Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

2. Relief from the Stay is granted to the extent necessary to permit the Assessment Appeal Process to proceed in the ordinary course to determine the appeals and liquidate claim amounts, if any. For the avoidance of doubt, the Assessment Appeal Process includes any proceeding relating to real or personal property assessments, valuations, rates, special assessments, refunds, allocation or equalization, or any other proceeding brought before the Tribunals under the property tax laws of the State of Michigan or the City.

3. The Stay is lifted only to the extent necessary to allow the Assessment Appeal Process to proceed in the ordinary course and is not modified to permit collection or other activities to recover any refund, overpayment or other claim against the City.

4. This Order grants relief from the Stay only with regard to property tax appeals brought against the City, grants no relief as to any claim brought against an officer or inhabitant of the City and does not modify, in any way, this Court's Order Pursuant to Section 105(a) of the Bankruptcy Code Extending the Chapter 9 Stay to Certain (a) State Entities, (b) Non-Officer Employees and (c) agents and Representatives of the Debtor (Docket No. 166), entered on July 25, 2013.

5. This Order shall not be stayed pursuant to ~~Federal~~ Rule 4001(a)(3) of the Federal Rules of Bankruptcy Procedure 4001(a)(3) ~~but~~and shall be effective immediately.