

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846-SWR

Hon. Steven W. Rhodes

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ATTORNEY GENERAL BILL SCHUETTE'S RESPONSES TO RETIRED
DETROIT POLICE MEMBERS ASSOCIATION'S (RDPMA) REQUESTS FOR
PRODUCTION OF DOCUMENTS AS AMENDED BY RDPMA'S RESPONSE TO
STATE OF MICHIGAN'S MOTION TO QUASH AND FOR PROTECTIVE ORDER

Attorney General Bill Schuette, by counsel, answers Retired Detroit Police Members Association's Requests for Production of Documents and Other Things dated August 23, 2013, (Court document number 596), as amended September 9, 2013, (Court document number 787), to the extent the requests refer to the Attorney General individually:

REQUEST NO. 3: Please provide for inspection and copying any and all correspondence or other written communication, whether hard copy, electronic or otherwise, between Kevin Orr, Emergency Manager ("Orr"), or any of his employees, agents, staff, servants and attorneys to or from Bill Schuette, Attorney General of the State of Michigan (hereinafter "Schuette") regarding, referring or relating to the Chapter 9 Bankruptcy Petition filed in this matter on or about July 17, 2013, whether such correspondence or other communication was before or after the date the Petition was filed in this matter.

RESPONSE: Upon information and belief, the Attorney General is unaware of the existence of any documents responsive to this request as it applies to him individually.

REQUEST NO. 18: Please provide for inspection and copying any and all documents, including internal memoranda prepared by Snyder, Dillon or Schuette, their employees, agents, staff, servants and attorneys regarding possible alternatives to a Chapter 9 filing prior to the filing of the Petition in this matter.

RESPONSE: Upon information and belief, the Attorney General is unaware of the existence of any documents responsive to this request as it applies to him individually.

Respectfully submitted,

Bill Schuette
Attorney General

John J. Bursch
Solicitor General

B. Eric Restuccia
Deputy Solicitor General

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/s/ Michael R. Bell
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Dated: September 13, 2013

PROOF OF SERVICE (E-FILE)

I hereby certify that on September 13, 2013, I electronically filed the foregoing document(s) with the Clerk of the Court using the ECF System, which will provide electronic notice and copies of such filing of the following to the parties: Attorney General Bill Schuette's Responses to Retired Detroit Police Members Association's (RDPMA) Requests for Production of Documents as Amended by RDPMA's Response to State of Michigan's Motion to Quash and for Protective Order. I also certify that I have mailed by United States Postal Service the paper to the non-ECF participants.

/s/ Michael R. Bell
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for Attorney General Bill Schuette
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