

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

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

**PETITIONERS ROBERT DAVIS' AND CITIZENS UNITED AGAINST CORRUPT
GOVERNMENT'S MOTION FOR AN *EX PARTE* ORDER TO REDUCE THE TIME
FOR A PARTY TO TAKE ANY ACTION OR FILE ANY OBJECTIONS TO
PETITIONER ROBERT DAVIS' AND CITIZENS UNITED AGAINST CORRUPT
GOVERNMENT'S EMERGENCY MOTION FOR CLARIFICATION OF THE
COURT'S JULY 25, 2013 STAY ORDER**

PETITIONERS, Robert Davis and Citizens United Against Corrupt Government, by and through their attorney, Andrew A. Paterson, submits this, their Motion for an *Ex Parte* Order Reducing the Time for A Party To Take Any Action or File Any Objections to Petitioners Robert Davis' and Citizens United Against Corrupt Government's Emergency Motion for Clarification of the Court's July 25, 2013 Stay Order and states as follows:

1. Pursuant to LBR 9006-1(b), Petitioners Robert Davis and Citizens United Against Corrupt Government (“**Petitioners**”) respectfully request the Court to enter an *ex parte* order reducing the time for a party to take any action or file any objections to Petitioners' Emergency Motion for Clarification of the Court's July 25, 2014 Stay Order (“**Emergency Motion**”).
2. In accordance with LBR 9006-1(b), on September 19, 2013 Petitioners' legal counsel contacted Jim Nosedá, Assistant City Attorney for the City of Detroit, via email and

- telephone, and sought to obtain his acquiescence with this motion and an accelerated response time if he did not concur. Mr. Noseda denied Petitioners' counsel's request.
3. It is imperative and urgent for the Court to address the merits of Petitioners' Emergency Motion for Clarification of the Court's July 25, 2013 Stay Order, because Wayne County Circuit Court Judge, Lita M. Popke, has entered a show cause order requiring Saunteel Jenkins, President of the Detroit City Council, to show cause as to why she should not be removed from her position as the "appointed" city council president under quo warranto proceedings and has set a response time and a hearing date for **September 26, 2013**.
 4. On, September 19, 2013, Mr. Noseda filed a Notice with the Wayne County Circuit Court suggesting that this Court's July 25, 2013 Stay Order may apply to Petitioners' Application for Writ of Quo Warranto against Saunteel Jenkins seeking her removal as the "appointed" city council president for the City of Detroit.
 5. Accordingly, Petitioners respectfully request that the Court reduces the time for a party to take action or object to Petitioners' Emergency Motion to three (3) business days.

CONCLUSION/PRAAYER FOR RELIEF

Petitioners, Robert Davis and Citizens United Against Corrupt Government, pray that the Court enters an *ex parte* order reducing the time for a party to take action or object to Petitioners' Emergency Motion to 3 business days.

Respectfully submitted,

/S/ Andrew A. Paterson
Attorney for Petitioners Robert Davis and Citizens
United Against Corrupt Government
46350 Grand River, Suite C
Novi, MI 48374
(248) 568-9712

DATED; September 19, 2013

EXHIBIT 1
Proposed form of Order

**THE UNITED STATES BANKRUPTCY COURT
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CITY OF DETROIT, MICHIGAN,	:	Hon. Steven W. Rhodes
Debtor.	:	
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	X	

**ORDER GRANTING PETITIONERS ROBERT DAVIS' AND CITIZENS UNITED
AGAINST CORRUPT GOVERNMENTS' MOTION FOR AN *EX PARTE* REDUCING
THE TIME FOR A PARTY TO TAKE ANY ACTION OR FILE OBJECTIONS TO
PETITIONERS' EMERGENCY MOTION**

This matter coming before the Court on the motion of Petitioners Robert Davis and Citizens United Against Corrupt Government (“Petitioners”) for entry of an *ex parte* order reducing the time for a party to take any action or file any objections to Petitioner’s Emergency Motion for Clarification of the Court’s July 25, 2013 Stay Order (“Emergency Motion”); the Court having reviewed Petitioners’ motion and the Court having determined that the legal and factual bases set forth in the motion establish just cause for the relief granted herein:

IT IS HEREBY ORDERED THAT:

1. Petitioners’ motion is GRANTED.
2. In accordance with LBR 9006-1(b), the time for a party or a party of interest to file any objections to Petitioners’ Emergency Motion with this Court is reduced to three (3) business days.
3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

EXHIBIT 2

Notice of Motion and Opportunity to Object

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	:	
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NOTICE OF MOTION AND OPPORTUNITY TO OBJECT

Petitioners Robert Davis and Citizens United Against Corrupt Government has filed papers with the court for an *ex parte* order reducing the time for a party to take any action or file objections to Petitioners Robert Davis’ and Citizens United Against Corrupt Government’s Emergency Motion for Clarification of the Court’s July 25, 2013 Stay Order.

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 Petitioners Robert Davis’ and Citizens United Against Corrupt Government’s Motion for an *Ex Parte* Order Reducing the time for a party to take any action or file objections to Petitioners Robert Davis’ and Citizens United Against Corrupt Government’s Emergency Motion for Clarification of the Court’s July 25, 2013 Stay Order, or if you want the court to consider your views on the motion, the deadline to file an objection to the Emergency Motion is within 14 days (October 3, 2013) (21 days for matters covered by F.R.Bankr.P. 2002(a)) after service. Objections shall comply with F.R.Civ.P.8(b)(c) and (e). Accordingly, on or before, October 3, 2013, you or your attorney must:

File with the court a written request for a hearing or, if the court requires a written response, an answer, explaining your position at:

211 West Fort
Detroit, MI 48226

If you mail your request/response to the court for filing, you must mail it early enough so that the court will receive it on or before the date stated above.

You must also mail a copy to:

Andrew A. Paterson
Attorney for Petitioners Robert Davis and Citizens United Against Corrupt
Government
46350 Grand River, Suite C
Novi, MI 48374
(248) 568-9712
Aap43@hotmail.com

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. If an objection is not timely filed, the court may grant the motion without a hearing.

Dated: September 19, 2013

/s/Andrew A. Paterson
Attorney for Petitioners Robert Davis and
Citizens United Against Corrupt
Government
46350 Grand River, Suite C
Novi, MI 48374
(248) 568-9712
Aap43@hotmail.com

EXHIBIT 3

Brief [Not Required]

EXHIBIT 4
Certificate of Service

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CITY OF DETROIT, MICHIGAN,	:	Hon. Steven W. Rhodes
Debtor.	:	
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CERTIFICATE OF SERVICE

I, ANDREW A. PATERSON, certify that on September 19, 2013, I served a copy of Petitioners' Motion for Ex Parte Order To Reduce the Time for filing objections to Petitioners' Emergency Motion for Clarification of the Court's July 25, 2013 Order on the following parties, via email, at these email addresses:

Jim Noseda (NoseJ@Detroitmi.gov)

/S/ Andrew A. Paterson (P18690) _____
Attorney for Petitioners
46350 Grand River, Suite C
Novi, MI 48374
(248) 568-9712
Aap43@hotmail.com
P18690

EXHIBIT 5

NONE

EXHIBIT 6

DOCUMENTARY EXHIBITS [NONE]