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UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Hon. Steven W. Rhodes

Case No. 13-53846

Debtor.

NOTICE OF VIDEO DEPOSITION UNDER FED. R. CIV. P. 30 AND FED. R. BANKR. P. 7030

To: The Detroit Police Officers Association ("DPOA"); The Detroit Fire Fighters Association ("DFFA"); The Detroit Police Lieutenants & Sergeants Association ("DPLSA"); and The Detroit Police Command Officers Association ("DPCOA")

PLEASE TAKE NOTICE THAT, pursuant to Federal Rules of Civil

Procedure 26 and 30, made applicable to this proceeding by Federal Rules of

Bankruptcy Procedure 7026 and 7030, the City of Detroit ("the City"), by and

through its undersigned counsel, will take depositions upon oral examination of the

following person(s) at the time and place set forth, or such other time and place as

may be mutually arranged. All such depositions shall be taken at the offices of

Pepper Hamilton LLP, Suite 1800, 4000 Town Center, Southfield, Michigan 48075:

1. October 17, 2013 at 9:00 a.m.: Daniel F. McNamara

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- 2. October 17, 2013 at 10:15 a.m.: Mark Diaz
- 3. October 17, 2013 at 10:15 a.m.: Mark Young
- 4. October 17, 2013 at 11:30 a.m.: Mary Ellen Gurewitz
- 5. October 17, 2013 at 11:30 a.m.: Jeffrey M. Pegg
- 6. October 17, 2013 at 1:30 p.m.: Teresa Sanderfer
- 7. October 17, 2013 at 1:30 p.m.: Robert A. Shinske
- 8. October 17, 2013 at 2:45 p.m.: Linda Broden
- 9. October 17, 2013 at 2:45 p.m.: Rodney Sizemore
- 10.October 17, 2013 at 4:00 p.m.: Steve Dolunt
- 11. October 17, 2013 at 4:00 p.m.: James Moore

Dated: October 15, 2013

Respectfully submitted,

/s/ Deborah Kovsky-Apap Robert S. Hertzberg Deborah Kovsky-Apap PEPPER HAMILTON LLP 4000 Town Center, Suite 1800 Southfield, MI 48075 Telephone: (248) 359-7300 Fax: (248) 359-7700 hertzbergr@pepperlaw.com kovskyd@pepperlaw.com

- and -

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ATTORNEYS FOR THE CITY OF DETROIT

Certificate of Service

I, Deborah Kovsky-Apap, hereby certify that on October 15, 2013, I caused the foregoing Notice of Video Deposition to be filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter; via electronic mail to Earle Erman (eerman@ermanteicher.com), Barbara Patek (bpatek@ermanteicher.com), David Eisenberg (Deisenberg@ermanteicher.com) and Craig Zucker (czucker@ermanteicher.com), counsel for the DPOA, DFFA, DPLSA and DPCOA; and via electronic mail to the email addresses listed on Exhibit A hereto.

> <u>/s/ Deborah Kovsky-Apap</u> Deborah Kovsky-Apap (P68258)

EXHIBIT A

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