UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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

DECLARATION OF NOMINATION OF CERTAIN CREDITORS PURSUANT TO ORDER REGARDING THE SOLICITATION OF APPLICATIONS TO SERVE AS COURT'S EXPERT WITNESS ON THE ISSUE OF FEASIBILITY

Financial Guaranty Insurance Company ("**FGIC**") files this statement (the "**Statement**") on behalf of the Nominating Creditors (as defined below) pursuant to the *Order Regarding the Solicitation of Applications to Serve as Court's Expert Witness on the Issue of Feasibility*, entered on April 2, 2014 [Docket No. 3610] (the "**Order**"), in the above-captioned case (the "**Chapter 9 Case**").

STATEMENT

1. On April 2, 2014, the Court entered the Order, which provided that the Court will solicit applications for qualified persons to serve as an expert witness on the issue of the feasibility of the plan of adjustment of City of Detroit, Michigan (the "**City**"). The Order also provides that, on April 18, 2014, the Court will interview selected applicants, together with one representative for the City and representatives of other interested parties. The Order requested that, "by April 7, 2014, the creditor parties confer and submit to the Court a list of at least four attorneys representing a cross-section of creditor parties for the Court to consider selecting to participate in the interviews."

2. On April 4, 2014, representatives of the following creditors (collectively, the "**Nominating Creditors**") conferred to determine which attorneys to nominate to participate in the April 18, 2014 interviews of the expert witness applicants: (1) the Police and Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit; (2) the Official Committee of Retirees; (3) the Retired Detroit Police & Fire Fighters Association and the Detroit Retired City Employees Association; (4) Ambac Assurance Corp.; (5) National Public Finance Guarantee Corp.; (6) Assured Guaranty Municipal Corp.; (7) Syncora Guarantee Inc. and Syncora Capital Assurance Inc.; (8) FGIC; and (9) certain representatives of COPs holders.

3. The Nominating Creditors agreed to nominate the following attorneys (the "**Representative Attorneys**"):

Labor Nominees

- Robert D. Gordon
  CLARK HILL PLC
  151 S. Old Woodward, Suite 200
  Birmingham, MI 48009
  Phone: (248) 998-5882
  rgordon@clarkhill.com

- Barbara A. Patek
  ERMAN, TEICHER, ZUCKER & FREEDMAN, P.C.
  400 Galleria Officentre, Suite 444
  Southfield, MI 48034
  Phone: (248) 827-4100
  bpatek@ermanteicher.com

- Claude D. Montgomery
  DENTONS US LLP
  1221 Avenue of the Americas
  New York, New York 10020
  Phone: (212) 632-8390
  claude.montgomery@dentons.com

Financial Nominees

- Rick L. Frimmer
  SCHIFF HARDIN LLP
  233 South Wacker Drive, Suite 6600
  Chicago, IL 60606
  Phone: 312-258-5511
  rfrimmer@schiffhardin.com

- Stephen C. Hackney
  KIRKLAND & ELLIS LLP
  300 N. LaSalle St.
  Chicago, IL 60654
  Phone: (312) 862-2157
  shackney@kirkland.com

- Guy S. Neal
  SIDLEY AUSTIN LLP
  1501 K Street, N.W.
  Washington, DC 20005
  Phone: (202) 736-8041
  gneal@sidley.com

4. The Nominating Creditors have determined that the Representative Attorneys reflect a cross-section of both labor and financial creditors and, collectively, would ensure that all major constituencies are adequately represented at the expert witness interviews. Accordingly, the Nominating Creditors hereby nominate the Representative Attorneys to participate in the April 18, 2014 interviews of expert witnesses. Furthermore, given the numerous and varied creditor constituencies in this case and represented by the Representative Attorneys, the Nominating Creditors encourage the Court to select as many of the Representative Attorneys as feasible.

Dated: April 7, 2014
Birmingham, Michigan

/s/ Mark R. James

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– and –

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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2014 the *Declaration of Nomination of Certain Creditors Pursuant to Order Regarding the Solicitation of Applications to Serve as Court's Expert Witness on the Issue of Feasibility* was filed and served via the Court's electronic case filing and noticing system to all parties registered to received electronic notices in this matter.

/s/ Mark R. James
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Dated: April 7, 2014