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

NOTICE OF MEET AND CONFER SESSION REGARDING CERTAIN OBJECTIONS TO THE AMENDED DISCLOSURE STATEMENT WITH RESPECT TO AMENDED PLAN FOR THE ADJUSTMENT OF DEBTS OF THE CITY OF DETROIT

PLEASE TAKE NOTICE THAT:

- 1. On March 21, 2014, the City of Detroit (the "City") filed the Amended Disclosure Statement with Respect to Amended Plan for the Adjustment of Debts of the City of Detroit (Docket No. 3382) (the "Disclosure Statement") in the above-captioned case.
- 2. On April 2, 2014, the Court entered the Third Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment (Docket No. 3632) (the "Scheduling Order"). The Scheduling Order provides that, no later than April 14, 2014, "attorneys who have filed timely disclosure statement objections" (any such party, an "Objector") must "meet and confer" with counsel for the City "with a view toward narrowing and resolving

Order, at ¶ 5. The Scheduling Order further provides that "[t]his 'meet and confer' may be in person or by telephone." <u>Id.</u> As set forth in the Scheduling Order, "[a]ny party whose attorney fails to timely participate in this process will be deemed to have waived its objections to the disclosure statement." <u>Id.</u>

- 3. Pursuant to paragraph 5 of the Scheduling Order, on **Friday, April 11, 2014 at 10:00 a.m., Eastern Time**, the City will conduct a conference call (the "Meet and Confer Call") to discuss and work to narrow and resolve objections to the adequacy of the Disclosure Statement. With the exception of those parties identified on Exhibit A attached hereto with respect to whom the City has scheduled a discrete "meet and confer" session and who need not participate in the Meet and Confer Call the City urges all Objectors to carefully review this Notice and participate in the Meet and Confer Call.
- 4. The City believes that the Meet and Confer Call will be most productive if all participants can focus on specific proposed additions to, or deletions from, the Disclosure Statement (any such specific proposed additions or deletions, "Proposed Changes"). Accordingly, the City requests that each Objector who wishes to participate in the Meet and Confer Call send its Proposed Changes to counsel for the City either (a) as a Word document attached to an email; (b) by facsimile; or (c) by mail or express courier. Regardless of the method of

transmission, the City requests that Proposed Changes be delivered in such a manner as to be <u>received</u> no later than 24 hours prior to the Meet and Confer Call (<u>i.e.</u>, by 10:00 a.m., Eastern Time on April 10, 2014). Proposed Changes sent via email should be sent to Thomas A. Wilson at <u>tawilson@jonesday.com</u>. Proposed Changes sent via facsimile should be sent to Jones Day, care of Thomas A. Wilson, at (216) 579-0212. Proposed Changes sent by mail should be addressed to:

Thomas A. Wilson, Jones Day, North Point, 901 Lakeside Avenue, Cleveland, Ohio 44114.

5. Counsel to the City will reply (via email, facsimile or telephone) to each Objector from whom Proposed Changes are timely received with dial-in information for the Meet and Confer Call. Objectors sending Proposed Changes are urged to provide the City with an email address, facsimile number and/or a telephone number in the communication containing such Proposed Changes, so that counsel to the City can timely provide dial-in information for the Meet and Confer Call. To each Objector that provides an email address or a facsimile number, the City will distribute, in advance of the Meet and Confer Call, a document containing all Proposed Changes submitted by Meet and Confer Call participants, which document shall serve as the agenda for the Meet and Confer Call.

Respectfully submitted,

/s/ Heather Lennox

Dated: April 8, 2014

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ATTORNEYS FOR THE CITY

CLI-2202011v2 -4-13-53846-swr Doc 3900 Filed 04/08/14 Entered 04/08/14 14:29:01 Page 4 of 8

CERTIFICATE OF SERVICE

I, Heather Lennox, hereby certify that, on this 8th day of April, 2014, the foregoing Notice of Conference Call to Meet and Confer with Objecting Parties Regarding Objections to the Amended Disclosure Statement with Respect to Amended Plan for the Adjustment of Debts of the City of Detroit (the "Notice") was filed and served (a) via the Court's electronic case filing and noticing system; (b) via electronic mail or facsimile upon all parties (other than those parties identified on Exhibit A to the Notice) that have (i) filed a pending objection to the Amended Disclosure Statement with Respect to Amended Plan for the Adjustment of Debts of the City of Detroit (Docket No. 3382) (any such party, an "Objector") and (ii) included either an electronic mail address or facsimile number in such objection; and (c) via overnight mail on Objectors that included a physical address, but neither an electronic mail address nor a facsimile number, in such objection.

$/\mathrm{S}/$	Heather	Lennox	

EXHIBIT A

PARTIES THAT HAVE BEEN INVITED TO A SEPARATE MEET AND CONFER SESSION AND THAT NEED NOT (I) PARTICIPATE IN THE MEET AND CONFER CALL ON FRIDAY, APRIL 11, 2014 OR (II) RESPOND TO THIS NOTICE

Amalgamated Transit Union Local 26

Ambac Assurance Corporation

Assured Guaranty Municipal Corporation

Beneficial Holders of DWSD Bonds Represented by Waller Lansden Dortch & Davis, LLP

Berkshire Hathaway Assurance Corporation

City of Pontiac Retired Employees Association

County of Macomb, Michigan

Detroit Fire Fighters Association

Detroit Police Command Officers Association

Detroit Police Lieutenants & Sergeants Association

Detroit Police Officers Association

Detroit Retired City Employees Association

Deutsche Bank AG, London

Dexia Crédit Local and Dexia Holdings, Inc.

Financial Guaranty Insurance Company

FMS Wertmanagement AöR

General Retirement System of the City of Detroit

Housing Is a Human Right Coalition

Hypothekenbank Frankfurt AG, Hypothekenbank Frankfurt International S.A. and Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A.

International Union, UAW

Shirley V. Lightsey

Ben McKenzie, Jr.

Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees

National Public Finance Guarantee Corporation

Oakland County, Michigan

Official Committee of Retirees

Police and Fire Retirement System of the City of Detroit

Retired Detroit Police & Fire Fighters Association

Retired Detroit Police Members Association

Syncora Guarantee Inc. and Syncora Capital Assurance Inc.

Donald Taylor

U.S. Bank National Association

United Retired Governmental Employees