

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

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

)
)
)
)
)
)
)

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**JOINDER OF THE MICHIGAN COUNCIL 25 OF THE AMERICAN
FEDERATION OF STATE, COUNTY & MUNICIPAL EMPLOYEES,
AFL-CIO AND SUB-CHAPTER 98, CITY OF DETROIT RETIREES TO
THE OFFICIAL COMMITTEE OF RETIREES' (I) FIRST SET OF
REQUESTS TO THE DEBTOR FOR THE PRODUCTION OF
DOCUMENTS AND (II) FIRST SET OF
INTERROGATORIES TO THE DEBTOR**

Pursuant to Federal Rules of Civil Procedure 26, 33 and 34, made applicable to this proceeding by Federal Rules of Bankruptcy Procedures 7026, 7033, 7034, and 9014, and in connection with the Court's *Third Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment* [Docket No. 3632] (the "**Scheduling Order**"), the Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees (the AFSCME retiree chapter for City of Detroit retirees) (collectively, "**AFSCME**"), through its counsel, hereby joins in and adopts as if fully set forth herein the (i) *First Set of Requests to the Debtor for the Production of Documents* [Docket No. 3941] (the



“**Document Requests**”); and (ii) *First Set of Interrogatories to the Debtor* [Docket No. 3940] (the “**Interrogatories**”) filed by the Official Committee of Retirees.

AFSCME requests that the City respond to the Document Requests and Interrogatories as required pursuant to the Scheduling Order and produce all responsive documents at the offices of Lowenstein Sandler LLP, Attention: Sharon L. Levine, Esq. and Philip J. Gross, Esq., 65 Livingston Avenue, Roseland, New Jersey 07068.

Dated: April 10, 2014

LOWENSTEIN SANDLER LLP

By: /s/ Sharon L. Levine

Sharon L. Levine, Esq.

Philip J. Gross, Esq.

65 Livingston Avenue

Roseland, New Jersey 07068

(973) 597-2500 (Telephone)

(973) 597-6247 (Facsimile)

slevine@lowenstein.com

pgross@lowenstein.com

-and-

Herbert A. Sanders, Esq.

THE SANDERS LAW FIRM PC

615 Griswold St., Suite 913

Detroit, MI 48226

(313) 962-0099 (Telephone)

(313) 962-0044 (Facsimile)

hsanders@miafscme.org

-and-

Richard G. Mack, Jr., Esq.
MILLER COHEN PLC
600 West Lafayette Boulevard
4th Floor
Detroit, MI 48226-3191
(313) 566-4787 (Telephone)
(313) 964-4490 (Facsimile)
richardmack@millercohen.com

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

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

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

)
) Chapter 9
)
) Case No. 13-53846
)
) Hon. Steven W. Rhodes
)

CERTIFICATE OF SERVICE

The undersigned certifies that on April 10, 2014, the foregoing document was filed with the Clerk of the Court using the CM/ECF system, which provides electronic notification of such filing to all counsel of record.

Dated: April 10, 2014

/s/ Philip J. Gross

Philip J. Gross

LOWENSTEIN SANDLER LLP

65 Livingston Avenue

Roseland, New Jersey 07068

(973) 597-2500 (Telephone)

pgross@lowenstein.com