

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

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

**DOCUMENT REQUESTS OF INTERNATIONAL UNION, UAW TO DEBTOR CITY  
OF DETROIT, MICHIGAN REGARDING PLAN CONFIRMATION**

Pursuant to Federal Rule of Bankruptcy Procedure 7034, Federal Rule of Civil Procedure 34 and the Court's April 2, 2014 Third Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtors' Plan of Adjustment [Docket #3632], the International Union, UAW ("UAW") requests that Debtor City of Detroit ("City") produce documents responsive to the document requests set forth below upon the undersigned counsel by no later than April 25, 2014.

**DEFINITIONS AND RULES OF CONSTRUCTION**

1. "You" and "your" refers to the City of Detroit and/or its agents.
2. "DLC" means the Detroit Library Commission and/or its agents.
3. "GRS" means the General Retirement System of Detroit and/or its agents.
4. "State" means the State of Michigan and/or its agents.
5. "UAW's Interrogatories" means the April 11, 2014 Interrogatories of International Union, UAW to Debtor City of Detroit, Michigan Regarding Plan Confirmation.
6. "Document" has the same meaning as set forth in Federal Rule of Civil Procedure 34(a)(1)(A), and includes emails and other electronically stored information.



7. “Concerning” means relating to, referring to, describing, evidencing or constituting.

#### **GENERAL INSTRUCTIONS**

1. This Request for Production of Documents shall be continuing in nature and shall include any and all responsive documents discovered, prepared or created after the date of production specified above. All such subsequently-discovered, prepared or created documents responsive to this Request shall be produced promptly, but no later than within seven (7) calendar days of their discovery, preparation or creation.

2. All documents responsive to this Request for Production of Documents that are in your possession, custody or control shall be produced, including where you have joint possession, custody or control of the document(s) with one or more other individuals or entities. Where documents in your possession, custody or control include those that are attached to one another, they shall be produced as attached to one another and not separated.

3. For each document to which any privilege is claimed, identify the party asserting the privilege; the date of, and any title or heading affixed to the document, if any; the name and address of all persons to whom and by whom the document was sent or distributed; the type of document (e.g., letter, memorandum); the general subject matter; and the nature of the claimed privilege.

#### **DOCUMENT REQUESTS**

1. Any and all documents concerning correspondence between you and the DLC during or any time after December 2012 concerning either (1) pension benefits of active

DLC employees or retired former DLC employees or (2) pension contributions made on behalf of active DLC employees or retired former DLC employees.

2. Any and all documents concerning correspondence between you and the GRS during or any time after December 2012 concerning either (1) pension benefits of active DLC employees or retired former DLC employees or (2) pension contributions made on behalf of active DLC employees or retired former DLC employees.

3. Any and all documents concerning correspondence between you and the State during or any time after December 2012 concerning either (1) pension benefits of active DLC employees or retired former DLC employees or (2) pension contributions made on behalf of active DLC employees or retired former DLC employees.

4. Any and all documents upon which you relied or to which you referred in answering the UAW's Interrogatories.

5. Any and all documents concerning your answers to the UAW's Interrogatories.

Dated: New York, New York  
April 11, 2014

International Union, UAW

By: /s/ Peter D. DeChiara  
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*Attorneys for International Union, UAW*

**CERTIFICATE OF SERVICE**

I certify that on this 11<sup>th</sup> day of April 2014, I caused the foregoing document to be served on counsel for the City and for all other parties of record through the Court's CM/ECF system

/s/ *Peter D. DeChiara*  
Peter D. DeChiara