

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

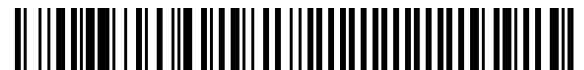
In re:	)	
	)	Chapter 9
CITY OF DETROIT, MICHIGAN,	)	
	)	Case No. 13-53846
Debtor.	)	
	)	Hon. Steven W. Rhodes

**CREDITORS AMERICAN FEDERATION OF STATE, COUNTY AND MUNICIPAL  
EMPLOYEES LOCAL 3308 AND LOCAL 917'S FIRST SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION**

Creditors, Local 3308 AND Local 917 of the American Federation of State, County and Municipal Employees, by and through their attorneys, Miller Cohen, P.L.C., pursuant to Rules 7033 and 7034 of the Federal Rule of Bankruptcy Procedure and Rules 33 and 34 of the Federal Rules of Civil Procedure, submit the following Interrogatories and request that Debtor City of Detroit answer in writing and under oath, the Interrogatories set forth herein and serve the responses upon the undersigned counsel no later than May 14, 2014.

**A.** Debtor is required to answer these interrogatories fully, in writing, and under oath within thirty (30) days of service. These interrogatories are deemed continuing, and Debtor is required to supplement their responses to these interrogatories as they become aware of additional and/or different information than that provided in their initial responses.

**B.** When used in reference to persons, the term "identify" requires Defendants: to provide the persons' names, employers, job titles, home addresses, work addresses, home telephone numbers, mobile telephone numbers, work telephone numbers, places of birth, dates of birth, social security numbers, and drivers' licenses numbers.



C. When used in reference to documents or other non-human tangible things, the term “identify” requires Defendants: to describe in detail the documents or other non-human tangible things, to state the dates on which they were created, to state the authors of the documents or the creators of the tangible things, to state their location, and to identify those persons who are in possession and/or control of them.

D. If you have some information responsive to a particular Interrogatory but cannot provide all of the information requested, your response should so state; provide the reasons for your inability to provide specific or full information; provide the best or most complete or most specific information that you can provide on the subject; and identify every person whom you believe has the requested information.

E. With respect to any Interrogatory to which you assert a claim of privilege, provide, at the time the Interrogatories are answered, a statement setting forth the basis for your claim of privilege and fully identifying any information withheld that may be within the scope of the request.

### **INTERROGATORIES**

1. Please identify all individuals who will sign the responses to these interrogatories and all individuals who contributed to and/or were consulted in connection with the preparation and/or drafting of the responses to these interrogatories, including those individuals from whom the information needed for the responses was obtained.

a. For each and every individual you identified in response to this interrogatory, please state in detail all information obtained from that individual.

### **RESPONSE:**

2. Please identify and fully describe the funding process for 36<sup>th</sup> District Court,

including but not limited to how the funds are appropriated, a description of all services and obligations at 36<sup>th</sup> District Court which are not funded by the City, and the overall flow of money between the City and 36<sup>th</sup> District Court.

a. For each response, please state in detail the full and complete factual and legal bases for the funding. Identify any relevant case law.

**RESPONSE:**

3. Please identify any identity of interests between the City of Detroit and 36<sup>th</sup> District Court, including but not limited to, evidence demonstrating an indemnity relationship between the City of Detroit and 36<sup>th</sup> District Court. For each identity listed, please state or produce:

a. Any evidence or documents which supporting the City of Detroit's response to this Interrogatory.

b. Any individuals who can testify in support of the City of Detroit's response to this Interrogatory

c. For each and every individual identified in response to this Interrogatory, please provide their address, phone number, and email address.

**RESPONSE:**

4. Please identify any assets in which 36<sup>th</sup> District Court has contributed to the City's reorganization. For each asset listed, please state or produce:

a. Any evidence or documents which demonstrate the contribution.

b. Any individuals who can testify to the alleged contribution.

c. For each and every individual identified in response to this Interrogatory, please provide their address, phone number, and email address.

**RESPONSE:**

5. Please identify any information or evidence demonstrating that an injunction or stay preventing claims against 36<sup>th</sup> District Court is essential to reorganization. Additionally, any information or evidence demonstrating that reorganization hinges on the City of Detroit being free from creditors of 36<sup>th</sup> District Court. For any evidence listed, please state or produce:

a. Any evidence or documents which supporting the City of Detroit's response to this Interrogatory.

b. Any individuals who can testify in support of the City of Detroit's response to this Interrogatory

c. For each and every individual identified in response to this Interrogatory, please provide their address, phone number, and email address.

**RESPONSE:**

6. Please identify any provisions, information or evidence demonstrating whether any classes within the bankruptcy have accepted the City's Plan for the Adjustment of Debts of the City of Detroit or Amended Plant for the Adjustment of Debts of the City of Detroit. For any provision, information or evidence listed, please state or produce:

a. Any evidence or documents which supporting the City of Detroit's response to this Interrogatory.

b. Any individuals who can testify in support of the City of Detroit's response to this Interrogatory

c. For each and every individual identified in response to this Interrogatory, please provide their address, phone number, and email address.

**RESPONSE:**

7. Please identify any provision, information or evidence demonstrating that the plan provides a mechanism to pay for all, or substantially all, of the class or classes affected by the injunction. If no such provision exists relating to this interrogatory, please respond that no provision exists. If a provision, information or evidence exists, please state or produce:

a. Any evidence or documents which supporting the City of Detroit's response to this Interrogatory.

b. Any individuals who can testify in support of the City of Detroit's response to this Interrogatory

c. For each and every individual identified in response to this Interrogatory, please provide their address, phone number, and email address.

**RESPONSE:**

8. Please identify any provision that would in the City's Amended Plan for the Adjustment of Debts of the City of Detroit, Amended Disclosure Statement with Respect to Amended Plan for the Adjustment of Debts of the City of Detroit, or any other document or provision which provides a mechanism to pay for all, or substantially all, of the class or classes affected by the injunction. If no such provision exists relating to this interrogatory, please respond that no provision exists. If a provision does exist or evidence does exist, please produce:

a. Any evidence or documents which supporting the City of Detroit's response to this Interrogatory.

b. Any individuals who can testify in support of the City of Detroit's response to this Interrogatory

c. For each and every individual identified in response to this Interrogatory, please provide their address, phone number, and email address.

**RESPONSE:**

9. Please identify any provision that would in the City's Amended Plan for the Adjustment of Debts of the City of Detroit, Amended Disclosure Statement with Respect to Amended Plan for the Adjustment of Debts of the City of Detroit, or any other document or provision which provides an opportunity for those claimants who choose not to settle to recover in full. If no such provision exists relating to this interrogatory, please respond that no provision exists. If a provision does exist or evidence does exist, please produce:

a. Any evidence or documents which supporting the City of Detroit's response to this Interrogatory.

b. Any individuals who can testify in support of the City of Detroit's response to this Interrogatory

c. For each and every individual identified in response to this Interrogatory, please provide their address, phone number, and email address.

**RESPONSE:**

10. Please identify any documents or information that demonstrates the court made a record of specific factual findings that support any of the City of Detroit's conclusions regarding Interrogatories 1 through 8. If no such information exists relating to this interrogatory, please respond that no information exists. If information or evidence does exist, please produce:

a. Any evidence or documents which supporting the City of Detroit's response to this Interrogatory.

b. Any individuals who can testify in support of the City of Detroit's response to this Interrogatory

c. For each and every individual identified in response to this Interrogatory,

please provide their address, phone number, and email address.

**RESPONSE:**

Respectfully submitted,

**MILLER COHEN, P.L.C.**

By: /s/ Robert D. Fetter

Robert D. Fetter (P68816)

Attorney for Defendant AFSCME 25

600 W. Lafayette Blvd., 4<sup>th</sup> Floor

Detroit, Michigan 48226

(313) 964-4454

Dated: April 11, 2014

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

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In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

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)  
) Chapter 9  
)  
) Case No. 13-53846  
)  
) Hon. Steven W. Rhodes  
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**PROOF OF SERVICE**

The undersigned certifies that on April 11, 2014, the American Federation of State, County and Municipal Employees Local 3308 and Local 917's First Set of Interrogatories and Request for Production were electronically filed with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

Respectfully submitted,

**MILLER COHEN, P.L.C.**

By: /s/ Robert D. Fetter

Robert D. Fetter (P68816)  
Attorney for Defendant AFSCME 25  
600 W. Lafayette Blvd., 4<sup>th</sup> Floor  
Detroit, Michigan 48226  
(313) 964-4454

Dated: April 11, 2014