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

CORRECTED STIPULATION TO ENTRY OF JOINT FINAL PRETRIAL ORDER BY DEBTOR AND CERTAIN PLAN OBJECTORS

Pursuant to Local Bankruptcy Rule 7016-1 and paragraph 6(c) of the *Eighth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment* (Aug. 13, 2014) [Dkt. 6699], (a) the City of Detroit, Michigan (the "City"), the proponent of the *Sixth Amended Plan for the Adjustment of Debts of the City of Detroit* (Aug. 20, 2014) [Dkt. 6908] (as it may be further amended, modified or supplemented, and including all exhibits and attachments thereto, the "Plan"), (b) certain supporters of the Plan (collectively with the City, the "Plan Supporters"), including The Detroit Institute of Arts, a Michigan nonprofit corporation (the "DIA Corp."), the Official Committee of Retirees of the City of Detroit (the "Committee"), and the Police and Fire

Retirement System of the City of Detroit and the General Retirement System of the City of Detroit (together, the "Retirement Systems"), and (c) certain objectors to the Plan (collectively, the "Objectors"), including (i) Syncora Guarantee Inc. and Syncora Capital Assurance Inc. (together, "Syncora"), (ii) Financial Guaranty Insurance Company ("FGIC"), (iii) Assured Guaranty Municipal Corporation ("Assured"), (iv) National Public Finance Guarantee Corporation ("National"), (v) Berkshire Hathaway Assurance Corporation ("BHAC"), (vi) U.S. Bank National Association, as Indenture Trustee for the DWSD Bonds (the "Trustee", and together with Assured, and National and BHAC, the "DWSD Parties"), (vii) Wilmington Trust, National Association, as successor contract administrator ("WTNA"), (viii) the Ad Hoc COPs Holders , (ixviii) International Union, UAW ("UAW"), (ix) the County of Wayne, Michigan, (xi) the County of Oakland, Michigan, and (xii) the County of Macomb, Michigan, by and through its County Agency, Anthony V. Marrocco, the Macomb County Public Works Commissioner, and the Macomb Interceptor Drain Drainage District ("Macomb Parties"), have conferred and, as indicated by the signatures of counsel below, hereby stipulate to entry of the Joint Final Pretrial Order attached hereto as Exhibit 1 and move the Court for its entry.

Dated: August 26, 2014

Respectfully submitted,

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SUMMARY OF ATTACHMENTS

The following documents are attached to this Stipulation to Entry of Joint Pretrial Order by Debtor and Certain Plan Objectors, labeled in accordance with Local Rule 9014-1(b).

Exhibit 1	Proposed Form of Order
Exhibit 2	Notice [Notice Not Required]
Exhibit 3	None [Brief Not Required]
Exhibit 4	Certificate of Service [To Be Separately Filed]

EXHIBIT 1

Proposed Form of Order

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

CORRECTED JOINT FINAL PRETRIAL ORDER

Having been advised in the premises and having considered the *Stipulation to Entry of Joint Final Pretrial Order by Debtor and Certain Plan Objectors* (the "Stipulation"), the Court hereby GRANTS the Stipulation and enters the following Pretrial Order.[1]

The Court hereby finds and determines as follows:

I. JURISDICTION

A. Plan Supporters

The City of Detroit, Michigan (the "City"), The Detroit Institute of Arts, a Michigan nonprofit corporation (the "DIA Corp."), the Official Committee of

[1] Capitalized terms not otherwise defined herein have the meanings given to them in the Plan (as such term is defined below).

Retirees of the City of Detroit (the "Committee"), and the Police and Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit (together, the "Retirement Systems") (collectively, the "Plan Supporters") assert that this Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue for this matter is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

B. Objectors (as defined in the Stipulation to Entry of Joint Final Pretrial Order by Debtor and Certain Plan Objectors)

Objectors' concur with the Plan Supporters' assertion of jurisdiction.

II. STATEMENT OF CLAIMS

A. Plan Supporters' Statement of Claims

1. The City's Statement of Claims

The City refers to, and incorporates herein by reference, the following briefs for its Statement of Claims: (a) *Consolidated Reply to Certain Objections to Confirmation of Fourth Amended Plan for the Adjustment of Debts of the City of Detroit* [Dkt. 5034]; (b) *Debtor's Supplemental Brief on Legal Issues Relating to Confirmation of Fourth Amended Plan for the Adjustment of Debts of the City of Detroit* [Dkt. 5707]; (c) *City's Supplemental Brief Regarding Standing of Syncora to Raise Certain Objections to Confirmation* [Dkt. 6010]; and (d) *Consolidated (A) Pretrial Brief in Support of Confirmation of Corrected Sixth Amended Plan for the*

Adjustment of Debts of the City of Detroit and (B) Response to (I) Objections Filed by Individual Retirees and (II) Supplemental Objections [*to be filed Aug. 27, 2014*].

2. **The Committee's Statement of Claims**

The Committee further refers to, and incorporates herein by reference, the following briefs for its Statement of Claims: (a) *Memorandum of Official Committee of Retirees of the City of Detroit Addressing Issue Nos. 4,5,6,9 & 10 from the June 5, 2014 Court Order Identifying Legal Issues* [Dkt. 5709]; (b) *Official Committee of Retirees' Memorandum of Law in Support of Confirmation of Fifth Amended Plan for Adjustment of Debts Filed by the City of Detroit, Michigan* [Dkt. 6508]; (c) *The Official Committee of Retirees Reservation of Rights with Respect to the Confirmation of the Corrected Fifth Amended Plan for Adjustment of Debts for the City of Detroit* [Dkt. 6675]; (d) *Official Committee of Retirees' Supplemental Brief in Support of Confirmation of the City's Plan for the Adjustment of Debts* [Dkt. insert]; and (e) *Official Committee of Retirees' Pretrial Brief in Support of Confirmation of Fifth Amended Plan for Adjustment of Debts Filed by the City of Detroit, Michigan* [*to be filed Aug. 27, 2014*].

3. **The DIA Corp.'s Statement of Claims**

The DIA Corp. refers to, and incorporates herein by reference, the following briefs for its Statement of Claims: (a) *Response of the Detroit Institute of Arts to*

Objections to the City's Amended Plan of Confirmation [Dkt. 5054]; and (b) *Pretrial Brief of the Detroit Institute of Arts in Support of Confirmation of the Corrected Sixth Amended Plan for the Adjustment of Debts of the City of Detroit* [*to be filed Aug. 27, 2014*].

4. **The Retirement Systems' Statement of Claims**

The Retirement Systems refer to, and incorporate herein by reference, the following briefs for their Statement of Claims: (a) *Joinder of Detroit Retirement Systems in Certain Arguments of the Official Committee of Retirees and of the City of Detroit Regarding Issue Nos. 5, 9, and 10 from the June 5, 2014, Court Order Identifying Legal Issues* [Dkt. 5959]; (b) *Corrected Brief of the Detroit Retirement Systems in Support of Proposed Treatment of Pension Claims Under "Alternative A" of the Corrected Fifth Amended Plan for Adjustment of Debts of the City of Detroit and Statement of Reservations* [Dkt. 6520]; (c) *Corrected Limited Objection of the Detroit Retirement Systems to the Corrected Fifth Amended Plan for the Adjustment of Debts of the City of Detroit* (July 29, 2014) [Dkt. 6676]; (d) *Supplemental Brief of the Detroit Retirement Systems in Response to Certain Supplemental Objections to the Fifth Amended Pla*n [Dkt. 6762]; and (e) the *Retirement Systems' Pretrial Brief in Support of Plan Confirmation of Fifth Amended Plan of Adjustment of Debts filed by the City of Detroit, Michigan* [*to be filed Aug. 27, 2014*].

B. Objectors' Statement of Claims

1. Syncora's Statement of Claims

Syncora Guarantee Inc. and Syncora Capital Assurance Inc. (together, "Syncora") refers to, and incorporates herein by reference, the following briefs for its Statement of Claims: (a) *Syncora's Proof of Claim* served on February 21, 2014; (b) *Syncora's Objection to the Debtor's Plan of Adjustment* [Dkt. 4679]; (c) *Syncora's First Supplemental Objection Regarding Certain Legal Issues Relating to Confirmation* [Dkt. 5706]; (d) *Syncora's Supplemental Brief Regarding Its Standing to Object to Plan Confirmation* [Dkt. 6009]; (e) *Syncora's Second Supplemental Objection to the Debtor's Plan of Adjustment* [Dkt. 6651]; and (f) *Syncora's Pre-Trial Brief* [*Dkt. ____, to be filed Aug. 27, 2014*].

2. FGIC's Statement of Claims

Financial Guaranty Insurance Company ("FGIC") refers to, and incorporates herein by reference, the following for its Statement of Claims: (a) *Objection of Financial Guaranty Insurance Company to Plan for the Adjustment of Debts of the City of Detroit,* dated May 12, 2014 [Dkt. 4660]; (b) *Supplemental Objection of Financial Guaranty Insurance Company to Plan for the Adjustment of Debts of the City of Detroit*, dated August 12, 2014 [Dkt. 6674]; (c) *Financial Guaranty Insurance Company's Pretrial Brief in Support of Objection to Plan for the Adjustment of Debts of the City of Detroit* [*to be filed Aug. 27, 2014*]; and (d) *Joint*

Pretrial Brief in Support of Objection to DIA Settlement [*to be filed Aug. 27, 2014*].

3. **WTNA's Statement of Claims**

Wilmington Trust, National Association, as successor contract administrator ("WTNA") refers to, and incorporates herein by reference, the following for its Statement of Claims: (a) WTNA's Proofs of Claim Nos. 1120, 1136, 1138 and 1197 filed on February 19, 2014; (b) *Joinder to Objection of Certain COPs Holders and Limited Objection of Wilmington Trust, National Association, as Successor Contract Administrator, to the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit* (May 12, 2104)[Dkt. 4656]; (c) *Joinder to Supplemental Objection of Financial Guaranty Insurance Company to Plan for the Adjustment of Debts of the City Of Detroit and Supplemental Limited Objection of Wilmington Trust, National Association, Successor Contract Administrator* (Aug. 12, 2014) [Dkt. 6678]; (d) *Joinder to (A) Financial Guaranty Insurance Company's Pretrial Brief in Support of Objection to Plan for the Adjustment of Debts of the City of Detroit and (B) Cops Holders' Pre-Trial Memorandum of Law in Opposition to Confirmation of the Sixth Amended Plan for the Adjustment of Debts of the City of Detroit and Limited Pretrial Brief in Support of Objection of Wilmington Trust, National Association, as Successor Contract Administrator*

(Aug. 27, 2014) [Dkt. insert]; and (e) *Joint Pretrial Brief in Support of Objection to DIA Settlement*, (Aug. 27, 2014) [Dkt. ____].

4. **The DWSD Parties' Statement of Claims**

Assured Guaranty Municipal Corporation ("Assured"), National Public Finance Guarantee Corporation ("National"), Berkshire Hathaway Assurance Corporation ("BHAC"), and U.S. Bank National Association, as Indenture Trustee for the DWSD Bonds (the "Trustee", and together with Assured, National and BHAC, the "DWSD Parties") refer to, and incorporate herein by reference, the following briefs for the DWSD Parties' Claims: (a) *Objection Of Assured Guaranty Municipal Corp. To Confirmation Of Fourth Amended Plan For The Adjustment Of Debts Of The City Of Detroit* (May 5, 2014) [Dkt. 4674]; (b) *Brief Of Assured Guaranty Municipal Corp. In Response To Issue Number 7 In Order Identifying Legal Issues, Establishing Supplemental Briefing Schedule And Setting Hearing Dates And Procedures* [Dkt. 5704]; (c) *Supplemental Objection Of Assured Guaranty Municipal Corp. To Confirmation Of Corrected Fifth Amended Plan For The Adjustment Of Debts Of The City Of Detroit* (July 29, 2014) [Dkt. 6677]; (d) *National Public Finance Guarantee Corporation's Objection To Fourth Amended Plan For The Adjustment Of Debts Of The City Of Detroit* [Dkt. 4665]; (e) *National Public Finance Guarantee Corporation's Supplemental Brief Regarding Legal Issue #7* [Dkt. 5703]; (f) *National Public Finance Guarantee*

Corporation's Joinder To The Supplemental Objection Of Assured Guaranty Municipal Corp. To Confirmation Of Corrected Fifth Amended Plan For The Adjustment Of Debts Of The City Of Detroit (July 29, 2014) [Dkt. 6687]; (g) *Objection Of Berkshire Hathaway Assurance Corporation To Confirmation Of Fourth Amended Plan For The Adjustment Of Debts Of The City Of Detroit* [Dkt. 4657]; (h) *Joinder By Berkshire Hathaway Assurance Corporation In Supplemental Objection Of Assured Guaranty Municipal Corp. To Confirmation Of Corrected Fifth Amended Plan For The Adjustment Of Debts Of The City Of Detroit* [Dkt. 6680]; (i) *The DWSD Bond Trustee's Objection To The City's Fourth Amended Plan For The Adjustment Of Debts Of The City Of Detroit* [Dkt. 4647]; (j) *Joint Supplemental Brief Of The DWSD Bond Trustee And The Ad Hoc Committee Of DWSD Bondholders Regarding Legal Issue No. 4 And Joinder To The Supplemental Briefs Of Assured Guaranty Municipal Corp. And National Public Finance Guarantee Corporation Regarding Legal Issue No. 7* [Dkt. 5705]; (k) *Joinder of the DWSD Bond Trustee to the Supplemental Objection of Assured Guaranty Municipal Corp. to Confirmation of Corrected Fifth Amended Plan for the Adjustment of Debts of the City of Detroit* (July 29, 2014) [Dkt. 6679], (l) *DWSD Parties' Statement In Response To Court's Notice Of Proposed Order Identifying Legal Issues, Establishing Briefing Schedule And Setting Hearing And Procedures* [Dkt. 5225], (m) *DWSD Parties' Statement In Response To Court's*

Order Regarding Identifying Legal Issues Relating To Confirmation [Dkt. 5038]; and (*l*) *Pre-Trial Brief of DWSD Parties* (to be filed at an as yet undetermined future date)[2] [Dkt. ____].

5. **The Ad Hoc COPs Holders' Statement of Claims**

The Ad Hoc COPs Holders[3] refer to, and incorporate herein by reference, the following for its Statement of Claims: (a) *Objection of Financial Guaranty Insurance Company to Plan for the Adjustment of Debts of the City of Detroit* (May 12, 2014) [Dkt. 4660]; (b) *Supplemental Objection of Financial* Guaranty *Insurance Company to Plan for the Adjustment of Debts of the City of Detroit* (Aug. 12, 2014) [Dkt. 6674]; (c) *Financial Guaranty Insurance Company's Pretrial Brief in Support of Objection to Plan for the Adjustment of Debts of the City of De*troit (Aug. 27, 2014)[Dkt. ___]; (d) *Joint Pretrial Brief in Support of Objection to DIA Settlement* (Aug. 27, 2014) [Dkt.___]; (e) *COPs Holders' Objection to Confirmation of the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit*, (May 12, 2014) [Dkt. 4653]; and (f) *COPs Holders' Pre-Trial*

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[2] The City and the DWSD Parties entered a stipulation that would, *inter alia*, postpone the deadline for the DWSD Parties to file their pre-trial brief. [Dkt. 6875]. This Court approved the stipulation on August 19, 2014. [Dkt. 6884].

[3] The "Ad Hoc COPs Holders" are: Dexia Crédit Local and Dexia Holdings, Inc.; Panning Capital Management, LP, on behalf of funds and accounts managed by it; Monarch Alternative Capital LP, on behalf of funds and accounts managed by it; Bronze Gable, L.L.C.; Aurelius Capital Management, LP, on behalf of its managed entities; Stone Lion Capital Partners L.P., on behalf of funds and accounts managed by it; BlueMountain Capital Management, LLC, on behalf of funds and accounts managed by it; and Deutsche Bank AG, London.

Memorandum of Law in Opposition to Confirmation of the Corrected Fifth Amended Plan for the Adjustment of Debts of the City of Detroit (Aug. 27,2014) [Dkt. ____].

6. **The UAW's Statement of Claims**

The International Union, UAW ("UAW") refers to, and incorporates herein by reference, the following for its Statement of Claim: (a) the Objection of International Union, UAW to Fifth Amended Plan for the Adjustment of Debts of the City of Detroit filed on August 1, 2015 [Dkt. 6464]; and (b) the Pretrial Brief of International Union, UAW in Support of Objection to Plan Confirmation filed August 27, 2014.

7. **Wayne County's Statement of Claims**

The County of Wayne, Michigan, has set forth the grounds for its objections to the Plan in the following documents which are hereby referred to and incorporated herein by reference: (a) *Wayne County's Brief Regarding Its Standing to Raise Objections to The Debtor's Fourth Amended Plan of Adjustment* (June 27, 2014)[Dkt. 5627], and (b) *Wayne County's Concurrence In, and Adoption of, The Objections of Macomb County* [Dkt. 4636] *and Oakland County* [Dkt. 4627] *to Confirmation of the Debtor's Fourth Amended Plan of Adjustment* [Dkt. 4663].

8. **Oakland County's Statement of Claims**

The County of Oakland, Michigan, has set forth the grounds for its objections to the Plan in the following documents which are hereby referred to and incorporated herein by reference: (a) *Oakland County's Objection to Confirmation of the City of Detroit, Michigan's Proposed Fourth Amended Plan of Adjustment* [Dkt. 4627]; (b) *Oakland County's Brief on Standing Pursuant to Court's June 5, 2014 Order Identifying Legal Issues, Establishing Supplemental Briefing Schedule and Setting Hearing Dates and Procedures* [Dkt. 5694]; (c) *Oakland County's Supplemental Objection to Confirmation of the City of Detroit, Michigan's Proposed Plan of Adjustment* [Dkt. 6648]; and (d) *Pre-Trial Brief of Oakland County* [Dkt. ____].

9. **The Macomb Parties' Statement of Claims**

The County of Macomb, Michigan, a Michigan Constitutional corporation, by and through its County Agency, Anthony V. Marrocco, the Macomb County Public Works Commissioner ("Macomb"), and Macomb Interceptor Drain Drainage District (the "MIDDD," and together with Macomb, the "Macomb Parties"), have set forth the grounds for their objections to the Plan in the following documents which are hereby referred to and incorporated herein by reference: (a) *Objection of County of Macomb, Michigan, By and Through Its County Agency, The Macomb County Public Works Commissioner, and The Macomb Interceptor Drain Drainage District To Fourth Amended Plan For The Adjustment of Debts of*

The City of Detroit and The Assumption of Sewer Contracts [Dkt. 4636]; (b) *Brief In Support of Standing of County of Macomb, Michigan, By and Through Its County Agency, The Macomb County Public Works Commissioner, To Object To Fourth Amended Plan For The Adjustment of Debts of The City Of Detroit* [Dkt. 5692]; (c) *Supplemental Objection of County of Macomb, Michigan, By and Through Its County Agency, The Macomb County Public Works Commissioner, and The Macomb Interceptor Drain Drainage District To Fifth Amended Plan For The Adjustment of Debts of The City of Detroit and The Assumption of Sewer Contract* [Dkt. 6666]; and (d) *Pre-Trial Brief of County of Macomb, Michigan, By and Through Its County Agency, The Macomb County Public Works Commissioner and The Macomb Interceptor Drain Drainage District* [Dkt. ___].

III. STIPULATED FACTS

1. Kevyn D. Orr was appointed "emergency financial manager" for the City by the Local Emergency Financial Assistance Loan Board created under the Emergency Municipal Loan Act, MCL §§ 141.931-141.942, on March 15, 2013, pursuant to Public Act 72 of 1990 of the State of Michigan, also known as the Local Government Fiscal Responsibility Act, MCL §§ 141.1201-141.1291 ("PA 72"). Mr. Orr formally took office as the emergency financial manager for the City under PA 72 on March 25, 2013. On March 28, 2013, the effective date of PA 436, PA 72 was repealed, and Mr. Orr became the Emergency Manager of the

City pursuant to Sections 2(e) and 31 of PA 436 (MCL §§ 141.1542(e) and 141.1571).

2. On July 16, 2013, the Emergency Manager sent a letter to the Governor of Michigan (the "Governor"), recommending that the City file for protection under chapter 9 of title 11 of the United States Code (the "Bankruptcy Code") pursuant to Section 18(1) of PA 436.

3. On July 18, 2013, the Governor sent a reply letter to the Emergency Manager stating that he authorized the City to commence a case under chapter 9 of the Bankruptcy Code.

4. On July 18, 2013, the City filed its *Voluntary Petition for City of Detroit, Michigan* [Dkt. 1], thereby commencing the above-captioned chapter 9 case (the "Chapter 9 Case").

5. The Court has ruled that the City is qualified to be a debtor under section 109(c) of the Bankruptcy Code and meets the eligibility requirements to seek relief under chapter 9 in the Chapter 9 Case. *See In re City of Detroit*, 504 B.R. 97, 190-91 (Bankr. E.D. Mich. 2013). An appeal of that ruling is pending. *See Police & Fire Ret. Sys. v. City of Detroit*, No. 14-1208 (6th Cir.)

6. In the *First Order Establishing Dates and Deadlines* (Aug. 2, 2013) [Dkt. 280] (the "First Scheduling Order"), the Court required the City to file a plan of adjustment on or before March 1, 2014.

7. The City filed a *Plan for the Adjustment of Debts of the City of Detroit* on February 21, 2014 [Dkt. 2708], under section 941 of the Bankruptcy Code.

8. The City subsequently filed an *Amended Plan for the Adjustment of Debts of the City of Detroit* on March 31, 2014 [Dkt. 3380]; a *Second Amended Plan for the Adjustment of Debts of the City of Detroit* on April 16, 2014 [Dkt. 4140]; a *Third Amended Plan for the Adjustment of Debts of the City of Detroit* on April 25, 2014 [Dkt. 4271]; a *Fourth Amended Plan for the Adjustment of Debts of the City of Detroit* on May 5, 2014 [Dkt. 4392]; and a *Corrected Fifth Amended Plan for the Adjustment of Debts of the City of Detroit* on July 29, 2014 [Dkt. 6379].

9. A S*ixth Amended Plan for the Adjustment of Debts of the City of Detroit* was filed on August 20, 2014 [Dkt. 6908] (the "Plan").

10. Contemporaneous with the filing of each of the first five versions of the Plans listed in paragraphs 7 and 8 above, the City filed an accompanying draft of the Disclosure Statement. Disclosure Statements thus were filed on February 21, 2014 (related to the original Plan) [Dkt. 2709]; March 31, 2014 (related to the First Amended Plan) [Dkt. 3382]; April 16, 2014 (with respect to the Second Amended Plan) [Dkt. 4141]; April 25, 2014 (with respect to the

Third Amended Plan) [Dkt. 4272]; and May 5, 2014 (with respect to the Fourth Amended Plan) [Dkt. 4391].

11. On May 5, 2014, the Court entered an *Order Approving the Proposed Disclosure Statement* [Dkt. 4401]. The final version of the Disclosure Statement was filed on May 5, 2014 [Dkt. 4391].

12. Consistent with the Court's (a) *Order (I) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Adjustment and (II) Approving Notice Procedures Related to Confirmation of the Plan of Adjustment* [Dkt. 2984], and (b) *Order Establishing Supplemental Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Adjustment with Respect to Pension and OPEB Claims* [Dkt. 4400], the City solicited acceptance of the Plan by various of the Classes of its creditors beginning on May 12, 2014.

13. The voting deadline was July 11, 2014. *See Fifth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment* (June 9, 2014) [Dkt. 5259].

14. The votes on the Plan were tabulated by Kurtzman Carson Consultants LLC ("KCC"), which served as the claims, noticing and balloting agent for the City. *See Declaration of Michael J. Paque Regarding the Solicitation and Tabulation of Votes on, and the Results of Voting With Respect to, Fourth*

Amended Plan for the Adjustment of Debts of the City of Detroit (July 21, 2014) [Dkt. 6179] (the "Paque Declaration").

15. As set forth in the Paque Declaration and the Supplemental Paque Declaration, Classes 5, 7, 8, 10, 11, 12, 13, 17 and certain Impaired Classes of the DWSD Bond Claims have accepted the Plan in accordance with § 1126 of the Bankruptcy Code. *See* Paque Declaration at ¶¶ 26-27, 33-34, 43-44, Ex. B; *Supplemental Declaration of Michael J. Paque Regarding the Solicitation and Tabulation of Votes on, and the Results of Voting with Respect to, Plan for the Adjustment of Debts of the City of Detroit* (August 11, 2014)[Dkt. 6665] (the "Supplemental Paque Declaration") at ¶¶ 7–11. In addition, certain Impaired Classes of the DWSD Bond Claims elected to receive New Existing Rate DWSD Bonds. *See* Paque Declaration at Ex. D.

16. Holders of Impaired Claims in Classes 9, 14, and 15 (collectively with Class 16, the "Rejecting Classes") have voted to reject the Plan. Class 16 is deemed to have rejected the Plan because the holders of Claims in Class 16 are not anticipated to receive any Distributions under the Plan. *See* Paque Declaration at ¶ 26 (Class 9); ¶¶ 43 – 46 (Classes 14 and 15). In addition, no one in Class 9 elected to participate in the Plan COP Settlement (as defined in the Fourth Amended Plan). *Id.* at Ex. D.

17. The Detroit Institute of Arts (the "Museum") is a museum operated and managed by the DIA Corp.

18. The Museum houses an art collection containing over 60,000 objects.

19. The DIA Corp. was founded as the Detroit Museum of Art ("DMA") in 1885.

20. In 1997, the City and the DIA Corp. (at the time, known as the Founders Society Detroit Institute of Arts) entered into a twenty-year operating agreement.

21. The 1997 operating agreement is still in effect.

22. The remedy available to COP holders "is the same remedy that the Retirement Systems would have against the City if it failed to make its required annual payment to fund UAAL under the tradition funding mechanism." (Offering Circular for Taxable COPs Series 2006 at 10.)

23. The City of Detroit has never had a county or state equalization factor other than 1.00.

24. City of Detroit employees belong to 28 unions and 47 bargaining units. These numbers do not include employees of the Detroit Library Commission, a separate municipal corporation under Michigan law.

25. Gabriel Roeder Smith has served as system actuary for the PFRS and GRS for over 70 years.

26. Gabriel Roeder Smith listed the UAAL for the PFRS as $415,605,320 in its annual actuarial report for the period ending June 30, 2013.

27. Gabriel Roeder Smith listed the UAAL for the GRS as $1,084,210,716 in its annual actuarial report for the period ending June 30, 2013.

28. In 2012, the City and the State negotiated a "Financial Stability Agreement" in an effort to achieve financial stability for the City and a stable platform for the City's future growth.

29. Unforeseen events and circumstances may occur affecting the City's future financial performance, resulting in those assumptions proving inaccurate and the City being unable to fulfill its obligations under the Plan. No guarantee can be made as to the City's future financial performance due to a variety of unforeseeable circumstances that may affect such performance.

30. In September 2013, President Obama's administration announced a planned investment of $300 million in public and private aid to the City.

31. The Michigan State Housing Development Authority has allocated $52 million to the City.

32. The City raised the corporate tax rate from 1% to 2% in 2012.

33. The City received statutory authority to raise the income tax rate in 2008 and 2009 to 3% on residents, 2% on corporations, and 1.5% percent on nonresidents working in the City.

34. When a creditor obtains a judgment against the City, the City can increase property taxes above statutory limits in order to pay the judgment pursuant to the Revised Judicature Act (Mich. Comp. Laws. 600.6093).

35. Judgments enforced under the Revised Judicature Act are enforced *pari passu* with one another.

36. The City has paid judgments in the past by increasing property taxes.

37. The City has exceeded statutory limits on property taxes to pay judgments in the past.

38. The City Income Tax Act (Act 284 of 1964) authorizes the State to collect municipal income taxes on behalf of the City.

39. The City has an agreement in principle with the State to "piggyback" tax collections.

40. A study by McKinsey found that the City failed to collect $155 million in income taxes in 2009.

41. The Detroit Water and Sewerage Department ("DWSD") is a public service monopoly that provides the water supply and wastewater control and

treatment services for the entire city of Detroit and neighboring southeastern Michigan communities throughout Wayne, Oakland, Macomb, St. Clair, Lapeer, Genesee, Washtenaw and Monroe counties. The 1,079-square-mile water service area, which includes Detroit and 127 suburban communities, makes up approximately 40 percent of the state's population. Wastewater service is also provided to a 946-square-mile area that encompasses Detroit and 76 neighboring communities.

42. DWSD is a department of the City. DWSD is also an Enterprise Fund of the City (consisting of two separate and discrete funds, the Water Supply system Fund and the Sewage Disposal System Fund).

43. DWSD is one of the largest municipal water and sewerage departments in the nation.

44. DWSD provides water service to approximately four million people in the City and surrounding southeast Michigan communities.[4]

45. By Michigan statute, DWSD is a not-for-profit entity. Water and sewer rates are based on cost of service.

46. Section 123.141(2) of the Michigan Compiled Laws provides that the price charged by a city that contracts to sell water outside of its territorial

[4] The factual statement in this paragraph is taken from *United States v. City of Detroit*, 2013 WL 1282021, *3 (E.D. Mich. Mar. 27, 2013).

limits "shall be at a rate which is based on the actual cost of service determined under the utility basis of ratemaking."

47. Section 7-1203 of the Charter of the City of Detroit provides that "[a]ll moneys paid into the city treasury from fees collected for water, drainage or sewerage services shall be used exclusively for the payment of expenses incurred in the provision of these services…."

48. Oakland County is a party to several contracts with the City pursuant to which the City, through DWSD, provides water and sewer services for and on behalf of, Oakland County.

49. Macomb is a party to the Wastewater Disposal Services Contract dated as of September 30, 2009, between Macomb and Oakland Macomb Interceptor ("OMI"). OMI, in turn, is a party to the Wastewater Disposal Services Contract (the "OMI-Detroit Agreement"), dated October 22, 2009, between OMI and the City, by its Board of Water Commissioners. The OMI-Detroit Agreement provides that: (i) "Oakland and Macomb County … shall have the status and rights of Tier 1 Customers, including but not limited to participation on the Sewer Steering Committee and all of its subcommittees and work groups," and (ii) "Oakland County and Macomb County are intended third party beneficiaries of this Contract."

50. On May 6, 1977, the United States Environmental Protection Agency ("EPA") initiated suit against the City and the DWSD, alleging violations of the Clean Water Act, 33 U.S.C. § 1251 *et seq*. The violations alleged in that case, which were undisputed, involved DWSD's wastewater treatment plan and its National Pollutant Discharge Elimination System permit.[5] The commencement of this lawsuit began a 36 year period of federal oversight of the DWSD.

51. The 1977 case, styled *United States v. City of Detroit*, (the "Oversight Litigation") was originally assigned to the Honorable John Feikens. On September 14, 1977, Judge Feikens entered a Consent Judgment in the Oversight Litigation, establishing a compliance schedule for DWSD to address and correct the Clean Water Act violations.[6]

52. Judge Feikens retained jurisdiction in the Oversight Litigation until his retirement in 2010; shortly thereafter the case was transferred to the Honorable Sean Cox.[7]

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[5] The factual statements in this paragraph are taken from *United States v. City of Detroit*, 2013 WL 1282021, *1 (E.D. Mich. 2013).

[6] The factual statements in this paragraph are taken from *United States v. City of Detroit*, 2013 WL 1282021, *1, 3 (E.D. Mich. 2013).

[7] The factual statements in this paragraph are taken from *United States v. City of Detroit*, 2013 WL 1282021, *1 (E.D. Mich. 2013).

53. Between 1977 and 2010, DWSD repeatedly fell out of compliance with the requirements of the 1977 Consent Judgment, and amendments thereto.[8]

54. DWSD's long history of failing to comply with requirements of the Clean Water Act is well documented, most comprehensively in the myriad of compliance orders issued by Judge Cox in the Oversight Litigation.

55. Judge Cox noted in his September 9, 2011 Opinion and Order in *United States v. City of Detroit*:

> For the more than 34 years during which this action has been pending, the City and the DWSD have remained in a recurring cycle wherein the DWSD is cited for serious violations of its NPDES permit, the City and the DWSD agree to a detailed remedial plan aimed at compliance, but the DWSD is unable to follow the plan and is again cited for the same or similar violations. Although this Court has taken various measures, designed to eliminate the various impediments to compliance that have been identified by experts and acknowledged by the City, those measures have proven inadequate to achieve sustained compliance.[9]

56. In 2011 and 2012, the District Court entered orders in *United States v. City of Detroit*, E.D. Mich. Case No. 77-7110, concerning the governance of the DWSD. Those orders were incorporated into the DWSD's by-laws.

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[8] The factual statements in this paragraph are taken from *United States v. City of Detroit*, 2013 WL 1282021, *3-6 (E.D. Mich. 2013).

[9] The factual statements in this paragraph are taken from *United States v. City of Detroit*, 2012 WL 4757935, *3 (E.D. Mich. 2013).

57. Pursuant to the DWSD governance orders, among other things: (1) the Board of Water Commissioners, made up of four residents of Detroit, and one resident from each of the Counties, has sole authority for setting and approving wholesale water and sewerage rates, (2) the Director, upon authorization by the Board, has final authority to approve, among other things, the DWSD budget subject to the approval of rates by the Board, and (3) Board approval must be sought for procurements that exceed specified monetary thresholds. See By-Laws for the Detroit Water and Sewerage Department Board of Water Commissioners, Article XVIII.

58. A governance order entered by the District Court on September 9, 2011 provided for the establishment of a court-ordered "Root Cause Committee" to devise and propose a workable plan to address and remedy the underlying root causes of the DWSD's inability to comply with its NPDES permit and the Clean Water Act.

59. The Root Cause Committee developed a plan of action, which was approved by the District Court in a November 4, 2011 order. The Root Cause Committee also developed a plan of clarification, which was approved and adopted by the District Court in a December 14, 2012 order. The DWSD submitted a Final Director's Report of Compliance on March 15, 2013.

60. Citing the DWSD's operational and compliance progress, on March 27, 2013, the District Court issued an Order closing the Oversight Litigation. DWSD now operates under NPDES Permit No. MI0022802 issued March 1, 2013 (the "Permit") and Administrative Consent Order No. ACO-00131 between DWSD and the Michigan Department of Environmental Quality, Water Resources Division, dated July 8, 2011, entered in the Oversight Litigation (the "ACO"). Both the Permit and the ACO contain operating, compliance, monitoring and implementation provisions and deadlines, all of which are designed to bring DWSD into compliance with state and federal law.[10]

61. The repayment of the City's "equity" in the system was determined as a matter of fact as part of a Special Master Report commissioned by Judge Feikens in the District Court Case. *See* Report and Recommendations of the Masters, at 74-78, *United States v. City of Detroit*, Case No. 77-71100 [Dkt. 2376-2].

62. On December 15, 2010, the United States filed a First Superseding Criminal Indictment against former Detroit Mayor Kwame Kilpatrick ("Mr. Kilpatrick"); Bobby W. Ferguson, a close friend of Mr. Kilpatrick; Bernard Kilpatrick, Mr. Kilpatrick's father; Victor M. Mercado, the former head of the DWSD; and several other persons, in *United States of America v. Kilpatrick*, *et*

[10] The factual statements in this paragraph are taken from the City's *Motion to use Cash Collateral or to Obtain Credit* (filed August 11, 2014)[Dkt. 6644] at 18-19, ¶¶ 23-24.

al., Case No. 10-20403 (E. D. Mich.). The indictment alleged criminal conduct by Mr. Kilpatrick and his associates in relation to a number of City projects, including that they engaged in a widespread scheme that resulted in overcharges to DWSD for time, labor and materials on certain DWSD projects undertaken between 2000-2009, including the DWSD project for the repair of the Macomb interceptor sewer at 15 Mile Road.

63. After a lengthy jury trial, Kwame Kilpatrick, Mr. Ferguson and Bernard Kilpatrick, were found guilty on various criminal charges.

64. Shortly after beginning his term on March 25, 2013, Kevyn Orr, the City's Emergency Manager, asked his advisors to look into opportunities whereby the City could generate value from the City's assets, including, without limitation, the DWSD's assets.

65. Beginning in mid-to-late 2013, the City and the Counties discussed the creation of a Regional Authority to take over water and sewer service from the DWSD.

66. In January 2014, the City proposed to the Counties a memorandum of understanding (the "MOU") that included a $47 million annual base lease payment from the Regional Authority to the City, and (2) the assumption of the DWSD pension liabilities by the Regional Authority.

Agreement was not reached as to, among other things, the amount of the lease payment and the Counties did not sign the MOU.

67. On or about March 25, 2014, the City distributed a Request for Information to potential private operators of the DWSD's water and sewer systems, and requested proposals from private parties for a "public-private partnership of the operation and management of the Detroit Water and Sewage Disposal Systems" in the form of an operating and management agreement.

68. On November 21, 2013, the Court entered the Order Establishing Bar Dates for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof [Dkt. 1782]. Pursuant to this order, MIDDD timely filed its proof of claim on May 5, 2014 (the "MIDDD Proof of Claim"), approximately one month prior to the June 3, 2014 bar date set for governmental claims. The MIDDD Proof of Claim asserts $26 million in liquidated, unsecured claims plus additional unliquidated claims (the "MIDDD Claim").

69. On May 15, 2014, the City filed its objection to the MIDDD Proof of Claim (the "MIDDD Claim Objection") [Dkt. 4961].

70. On May 30, 2014, in accordance with the Solicitation Procedures Order, MIDDD filed the Motion for Temporary Allowance of Claim of the Macomb Interceptor Drain Drainage District Pursuant to Rule 3018(a) of

the Federal Rules of Bankruptcy Procedure for Purposes of Accepting or Rejecting the Debtor's Fourth Amended Plan of Adjustment [Dkt. 5155].

71. On June 13, 2014, the City filed objections to the Rule 3018 Motion. [Dkt. 5312]. On June 18, 2014, MIDDD filed its response to the MIDDD Claim Objection [Dkt. 5421]. On June 20, 2014, MIDDD filed its reply to the objections. [Dkt. 5498].

72. On July 14, 2014, MIDDD submitted its brief in support of temporary allowance of the MIDDD Claim in the amount of $26 million for the purpose of voting to accept or reject the Plan [Dkt. 6016].

73. On July 14, 2014, the City submitted its brief in support of its objections to the allowance of the MIDDD Claim for voting purposes [Dkt. 6015].

74. A hearing on the allowance of the MIDDD claim was held on July 17, 2014. On July 21, 2014, the Court issued an order concluding "that the claim of MIDDD shall be valued at $26 million for voting purposes only." [Dkt. 6162].

75. In addition to these stipulations, an *Order Approving Stipulation By and Between the City of Detroit, Michigan and the COPs Creditors Regarding Certain Facts and the Admission of Certain Exhibits for the Confirmation Trial* (July 14, 2014)[Dkt. 6002] reflects the agreement of certain parties (as reflected in the Order) with respect to certain facts and exhibits.

IV. ISSUES OF FACT AND LAW TO BE LITIGATED

A. Plan Supporters

1. The City's Issues of Fact and Law To Be Litigated

The City refers to, and incorporates herein by reference, the following briefs for the City's Issues of Fact and Law to Be Litigated: (a) *Consolidated Reply to Certain Objections to Confirmation of Fourth Amended Plan for the Adjustment of Debts of the City of Detroit* [Dkt. 5034]; (b) the *Debtor's Supplemental Brief on Legal Issues Relating to Confirmation of Fourth Amended Plan for the Adjustment of Debts of the City of Detroit* [Dkt. 5707]; (c) the *City's Supplemental Brief Regarding Standing of Syncora to Raise Certain Objections to Confirmation* [Dkt. 6010]; and (d) the *Consolidated (A) Pretrial Brief in Support of Confirmation of Corrected Sixth Amended Plan for the Adjustment of Debts of the City of Detroit and (B) Response to (I) Objections Filed by Individual Retirees and (II) Supplemental Objections. Objector's Issues of Fact and Law to Be Litigated* [Dkt.[Insert]]

2. The Committee's Issues of Fact and Law to Be Litigated

The Committee further refers to, and incorporates herein by reference, the following briefs for its Issues of Fact and Law To Be Litigated: (a) *Memorandum of Official Committee of Retirees of the City of Detroit Addressing Issue Nos. 4,5,6,9 & 10 from the June 5, 2014 Court Order Identifying Legal Issues* [Dkt.

5709]; (b) *Official Committee of Retirees' Memorandum of Law in Support of Confirmation of Fifth Amended Plan for Adjustment of Debts Filed by the City of Detroit, Michigan* [Dkt. 6508]; (c) *The Official Committee of Retirees Reservation of Rights with Respect to the Confirmation of the Corrected Fifth Amended Plan for Adjustment of Debts for the City of Detroit* [Dkt. 6675]; (d) *Official Committee of Retirees' Supplemental Brief in Support of Confirmation of the City's Plan for the Adjustment of Debts* [Dkt. insert]; and (e) *Official Committee of Retirees' Pretrial Brief in Support of Confirmation of Fifth Amended Plan for Adjustment of Debts Filed by the City of Detroit, Michigan* [Dkt. insert].

3. The DIA Corp.'s Issues of Fact and Law to Be Litigated

The DIA Corp. refers to, and incorporates herein by reference, the following briefs for the DIA Corp.'s Issues of Fact and Law to Be Litigated: (a) *Response of the Detroit Institute of Arts to Objections to the City's Amended Plan of Confirmation* [Dkt. 5054]; and (b) *Pretrial Brief of the Detroit Institute of Arts in Support of Confirmation of the Sixth Amended Plan for the Adjustment of Debts of the City of Detroit* [*to be filed Aug. 27, 2014*].

4. The Retirement Systems' Issues of Fact and Law to Be Litigated

The Retirement Systems refer to, and incorporate herein by reference, the following briefs for their Issues of Fact and Law to Be Litigated: (a) *Joinder of Detroit Retirement Systems in Certain Arguments of the Official Committee of*

Retirees and of the City of Detroit Regarding Issue Nos. 5, 9, and 10 from the June 5, 2014, Court Order Identifying Legal Issues [Dkt. 5959]; (b*) Corrected Brief of the Detroit Retirement Systems in Support of Proposed Treatment of Pension Claims Under "Alternative A" of the Corrected Fifth Amended Plan for Adjustment of Debts of the City of Detroit and Statement of Reservations* [Dkt. 6520]; (c) *Corrected Limited Objection of the Detroit Retirement Systems to the Corrected Fifth Amended Plan for the Adjustment of Debts of the City of Detroit* (July 29, 2014) [Dkt. No. 6676]; (d) *Supplemental Brief of the Detroit Retirement Systems in Response to Certain Supplemental Objections to the Fifth Amended Plan* [Dkt. 6762]; and (e) the *Retirement Systems' Pretrial Brief in Support of Plan Confirmation of Fifth Amended Plan of Adjustment of Debts filed by the City of Detroit, Michigan* [Dkt. _____].

B. Objectors' Issues of Fact and Law to Be Litigated

1. Syncora's Issues of Fact and Law to Be Litigated

Syncora refers to, and incorporates herein by reference, the following briefs for its Issues of Fact and Law to Be Litigated: (a) *Syncora's Proof of Claim* (Feb. 21, 2014); (b) *Syncora's Objection to the Debtor's Plan of Adjustment* [Dkt. 4679]; (c) *Syncora's First Supplemental Objection Regarding Certain Legal Issues Relating to Confirmation* [Dkt. 5706]; (d) *Syncora's Supplemental Brief Regarding Its Standing to Object to Plan Confirmation* [Dkt. 6009]; (e) *Syncora's Second*

Supplemental Objection to the Debtor's Plan of Adjustment [Dkt. 6651]; and (f) *Syncora's Pre-Trial Brief* [Dkt. ___, *to be filed August 27, 2014*].

2. **FGIC's Issues of Fact and Law to Be Litigated**

FGIC refers to, and incorporates herein by reference, the following for its Issues of Fact and Law to Be Litigated: (a) *Objection of Financial Guaranty Insurance Company to Plan for the Adjustment of Debts of the City of Detroit,* (May 12, 2014) [Dkt. 4660]; (b) *Supplemental Objection of Financial Guaranty Insurance Company to Plan for the Adjustment of Debts of the City of Detroit,* (Aug. 12, 2014) [Dkt. 6674]; (c) *Financial Guaranty Insurance Company's Pretrial Brief in Support of Objection to Plan for the Adjustment of Debts of the City of Detroit,* (Aug. 27, 2014) [Dkt. ____]; and (d) *Joint Pretrial Brief in Support of Objection to DIA Settlement,* (Aug. 27, 2014) [Dkt. ____].

3. **WTNA's Issues of Fact and Law to Be Litigated**

WTNA refers to, and incorporates herein by reference, the following for its Issues of Fact and Law to Be Litigated: (a) WTNA's Proofs of Claim Nos. 1120, 1136, 1138 and 1197 filed on February 19, 2014; (b) *Joinder to Objection of Certain COPs Holders and Limited Objection of Wilmington Trust, National Association, as Successor Contract Administrator, to the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit* (May 12, 2104)[Dkt. 4656]; (c) *Joinder to Supplemental Objection of Financial Guaranty Insurance Company to*

Plan for the Adjustment of Debts of the City Of Detroit and Supplemental Limited Objection of Wilmington Trust, National Association, Successor Contract Administrator (Aug. 12, 2014) [Dkt. 6678]; (d) *Joinder to (A) Financial Guaranty Insurance Company's Pretrial Brief in Support of Objection to Plan for the Adjustment of Debts of the City of Detroit and (B) Cops Holders' Pre-Trial Memorandum of Law in Opposition to Confirmation of the Sixth Amended Plan for the Adjustment of Debts of the City of Detroit and Limited Pretrial Brief in Support of Objection of Wilmington Trust, National Association, as Successor Contract Administrator* (Aug. 27, 2014) [Dkt. insert]; and (e) *Joint Pretrial Brief in Support of Objection to DIA Settlement*, (Aug. 27, 2014) [Dkt. ____].

4. **The DWSD Parties' Issues of Fact and Law to Be Litigated**

Assured Guaranty Municipal Corporation ("Assured"), National Public Finance Guarantee Corporation ("National"), Berkshire Hathaway Assurance Corporation ("BHAC"), and U.S. Bank National Association, as Indenture Trustee for the DWSD Bonds (the "Trustee", and together with Assured, National and BHAC, the "DWSD Parties") refer to, and incorporate herein by reference, the following briefs for the DWSD Parties' Issues of Fact and Law to Be Litigated: (a) *Objection Of Assured Guaranty Municipal Corp. To Confirmation Of Fourth Amended Plan For The Adjustment Of Debts Of The City Of Detroit* (May 5, 2014) [Dkt. 4674]; (b) *Brief Of Assured Guaranty Municipal Corp. In Response To Issue*

Number 7 In Order Identifying Legal Issues, Establishing Supplemental Briefing Schedule And Setting Hearing Dates And Procedures [Dkt. 5704]; (c) *Supplemental Objection Of Assured Guaranty Municipal Corp. To Confirmation Of Corrected Fifth Amended Plan For The Adjustment Of Debts Of The City Of Detroit* (July 29, 2014) [Dkt. 6677]; (d) *National Public Finance Guarantee Corporation's Objection To Fourth Amended Plan For The Adjustment Of Debts Of The City Of Detroit* [Dkt. 4665]; (e) *National Public Finance Guarantee Corporation's Supplemental Brief Regarding Legal Issue #7* [Dkt. 5703]; (f) *National Public Finance Guarantee Corporation's Joinder To The Supplemental Objection Of Assured Guaranty Municipal Corp. To Confirmation Of Corrected Fifth Amended Plan For The Adjustment Of Debts Of The City Of Detroit* (July 29, 2014) [Dkt. 6687]; (g) *Objection Of Berkshire Hathaway Assurance Corporation To Confirmation Of Fourth Amended Plan For The Adjustment Of Debts Of The City Of Detroit* [Dkt. 4657]; (h) *Joinder By Berkshire Hathaway Assurance Corporation In Supplemental Objection Of Assured Guaranty Municipal Corp. To Confirmation Of Corrected Fifth Amended Plan For The Adjustment Of Debts Of The City Of Detroit* [Dkt. 6680]; (i) *The DWSD Bond Trustee's Objection To The City's Fourth Amended Plan For The Adjustment Of Debts Of The City Of Detroit* [Dkt. 4647]; (j) *Joint Supplemental Brief Of The DWSD Bond Trustee And The Ad Hoc Committee Of DWSD Bondholders Regarding Legal Issue No. 4 And Joinder*

To The Supplemental Briefs Of Assured Guaranty Municipal Corp. And National Public Finance Guarantee Corporation Regarding Legal Issue No. 7 [Dkt. 5705]; (k) *Joinder of the DWSD Bond Trustee to the Supplemental Objection of Assured Guaranty Municipal Corp. to Confirmation of Corrected Fifth Amended Plan for the Adjustment of Debts of the City of Detroit* (July 29, 2014) [Dkt. 6679], (l) *DWSD Parties' Statement In Response To Court's Notice Of Proposed Order Identifying Legal Issues, Establishing Briefing Schedule And Setting Hearing And Procedures* [Dkt. 5225], (m) *DWSD Parties' Statement In Response To Court's Order Regarding Identifying Legal Issues Relating To Confirmation* [Dkt. 5038]; and (*l*) *Pre-Trial Brief of DWSD Parties* (to be filed at an as yet undetermined future date[2]) [Dkt. ____].

5. **The Ad Hoc COPs Holders' Issues of Fact and Law to Be Litigated**

The Ad Hoc COPs Holders refer to, and incorporate by reference, the following for its Issues of Fact and Law to Be Litigated: (a) *Objection of Financial Guaranty Insurance Company to Plan for the Adjustment of Debts of the City of Detroit* (May 12, 2014) [Dkt. 4660]; (b) *Supplemental Objection of Financial Guaranty Insurance Company to Plan for the Adjustment of Debts of the City of*

[2] The City and the DWSD Parties entered a stipulation that would, *inter alia*, postpone the deadline for the DWSD Parties to file their pre-trial brief. [Dkt. 6875]. This Court approved the stipulation on August 19, 2014. [Dkt. 6884].

Detroit (Aug. 12, 2014) [Dkt. 6674]; (c) *Financial Guaranty Insurance Company's Pretrial Brief in Support of Objection to Plan for the Adjustment of Debts of the City of De*troit (Aug. 27, 2014)[Dkt.]; (d) *Joint Pretrial Brief in Support of Objection to DIA Settlement* (Aug. 27, 2014) [Dkt.]; (e) *COPs Holders' Objection to Confirmation of the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit*, (May 12, 2014) [Dkt. 4653]; and (f) *COPs Holders' Pre-Trial Memorandum of Law in Opposition to Confirmation of the Corrected Fifth Amended Plan for the Adjustment of Debts of the City of Detroit* (Aug. 27, 2014) [Dkt.].

6. **The UAW's Issues of Fact and Law to Be Litigated**

UAW refers to, and incorporates herein by reference, the following for its Issues of Fact and Law to be Litigated: (a) the *Objection of International Union, UAW to Fifth Amended Plan for the Adjustment of Debts of the City of Detroit* filed on August 1, 2015 [Docket No. 6464]; and (b) the *Pretrial Brief of International Union, UAW in Support of Objection to Plan Confirmation* filed August 27, 2014.

7. **Wayne County's Issues of Fact and Law to Be Litigated**

The County of Wayne, Michigan, has set forth the grounds for its objections to the Plan in the following documents which are hereby referred to and incorporated herein by reference: (a) *Wayne County's Brief Regarding Its Standing to Raise Objections to The Debtor's Fourth Amended Plan of Adjustment*

(June 27, 2014)[Dkt. 5627], and (b) *Wayne County's Concurrence In, and Adoption of, The Objections of Macomb County [DE 4636] and Oakland County [DE 4627] to Confirmation of the Debtor's Fourth Amended Plan of Adjustment* [Dkt. 4663].

8. **Oakland County's Issues of Fact and Law to Be Litigated**

Oakland County has identified the issues of fact and law to be litigated in the following documents which are hereby referred to and incorporated herein by reference: (a) *Oakland County's Objection to Confirmation of the City of Detroit, Michigan's Proposed Fourth Amended Plan of Adjustment* [Dkt. 4627]; (b) *Oakland County's Brief on Standing Pursuant to Court's June 5, 2014 Order Identifying Legal Issues, Establishing Supplemental Briefing Schedule and Setting Hearing Dates and Procedures* [Dkt. 5694]; (c) *Oakland County's Supplemental Objection to Confirmation of the City of Detroit, Michigan's Proposed Plan of Adjustment* [Dkt. 6648]; and (d) *Pre-Trial Brief of Oakland County* [Dkt. ____].

9. **The Macomb Parties' Issues of Fact and Law to Be Litigated**

The Macomb Parties have identified the issues of fact and law to be litigated in the following documents which are hereby referred to and incorporated herein by reference: (a) *Objection of County of Macomb, Michigan, By and Through Its County Agency, The Macomb County Public Works Commissioner, and The Macomb Interceptor Drain Drainage District To Fourth Amended Plan For The*

Adjustment of Debts of The City of Detroit and The Assumption of Sewer Contracts [Dkt. 4636]; (b) *Brief In Support of Standing of County of Macomb, Michigan, By and Through Its County Agency, The Macomb County Public Works Commissioner, To Object To Fourth Amended Plan For The Adjustment of Debts of The City Of Detroit* [Dkt. 5692]; (c) *Supplemental Objection of County of Macomb, Michigan, By and Through Its County Agency, The Macomb County Public Works Commissioner, and The Macomb Interceptor Drain Drainage District To Fifth Amended Plan For The Adjustment of Debts of The City of Detroit and The Assumption of Sewer Contract*. [Dkt. 6666]; and (d) *Trial Brief of County Of Macomb, Michigan, By and Through Its County Agency, The Macomb County Public Works Commissioner and The Macomb Interceptor Drain Drainage District* [Dkt. ___].

V. EVIDENTIARY PROBLEMS LIKELY TO ARISE AT TRIAL

A. Plan Supporters' Position

The Plan Supporters, with the exception of the Retirement Systems, believe that evidentiary disputes likely to arise at trial can be addressed in good faith at the pretrial conference. The Retirement Systems anticipate the following evidentiary issues: (a) the admissibility of the report issued by Martha Kopacz ("Kopacz"), the individual appointed by the Court to serve as an independent expert pursuant to Fed. R. Evid. 706 [Dkt. No. 6847]; (b) the admissibility of certain testimony and

opinions offered by Kopacz relating to the Retirement Systems; and (c) the relevancy of evidence relating to alleged historical mismanagement/misconduct of the Retirement Systems.

B. Objectors' Position

The Objectors believe that evidentiary disputes likely to arise at trial can be addressed in good faith at the pretrial conference.

VI. WITNESSES

A. General Reservations of Rights

1. The parties have been conferring as to the authenticity and admissibility of certain exhibits which would otherwise require the appearance in court of a custodial witness. The parties reserve the right to call such witnesses if appropriate stipulations are not reached.

2. The parties may offer the testimony of some of their witnesses by deposition testimony; deposition designations will be exchanged in accordance with the procedures set forth in paragraphs 6 and 7 of the Eighth Amended Scheduling Order. Pursuant to paragraph 7(e)(i) of the Eighth Amended Scheduling Order and Local Bankruptcy Rule 7016-1, some parties have listed their deposition designations as exhibits in their exhibit lists. The parties reserve the right to offer appropriate counter-designations in response to any deposition designations offered by any other party which are not in compliance with the procedure set forth in the Eighth Amended Scheduling Order.

3. The parties reserve the right to designate the deposition testimony of witnesses initially listed on other parties' "Will Call" witness lists, if the listed witness is subsequently dropped from those lists, or is not called to testify at trial for any reason.

4. The parties will offer their deposition designations in evidence at the appropriate time during the Confirmation Hearing.

5. The parties reserve the right to call any witness identified by any party.

6. The parties reserve the right to call rebuttal witnesses not listed on their witness lists.

B. The Plan Supporters' Witnesses

1. **The City's Witnesses**

The City will call the following individuals as fact or expert witnesses, as noted below, and in an order to be provided on August 28th, as part of its case in chief or on rebuttal:

a. Kevyn D. Orr (Fact)

b. Kenneth A. Buckfire (Fact and Expert)

c. Gaurav Malhotra (Fact and Expert)

d. Charles M. Moore (Fact and Expert)

e. Robert Cline (Fact and Expert)

f. Caroline Sallee (Fact and Expert)

g. Glenn D. Bowen (Fact)

h. Suzanne Taranto (Fact and Expert)

i. Michael E. Duggan (Fact)

j. Brenda Jones (Fact)

k. John Hill (Fact and Expert)

l. Beth Niblock (Fact and Expert)

m. James E. Craig (Fact)

n. Edsel Jenkins (Fact)

o. Sue F. McCormick (Fact)

p. Vanessa Fusco (Fact and Expert)

q. Annemarie Erickson (Fact)

r. Roger S. Penske (Fact)

s. Daniel Gilbert (Fact)

t. Rip Rapson (Fact)

u. Michael Plummer (Expert)

v. John Satter (Expert)

w. Alan Perry (Expert)

x. Brom Stibitz

The City may call the following individuals as part of its case in chief or on rebuttal:

y. Vyto Kaunelis

z. Gary Evanko

2. **The Committee's Witnesses**

The Committee will call the following individuals as fact or expert witnesses, as noted below, as part of the City's case in chief or on rebuttal:

a. Howard Atkinson (Expert)

b. Ron Bloom (Fact)

c. Kim Nicholl (Expert)

d. Terri Renshaw (Fact)

e. Stuart Wohl (Fact and Expert)

3. **The DIA Corp.'s Witnesses**

The DIA Corp. will call the following individuals as fact or expert witnesses, as noted below, as part of the City's case in chief or on rebuttal:

a. Annmarie Erickson (Fact)

b. Michael Plummer (Expert)

c. Susan Mosey (Fact)

The DIA Corp. may call the following individuals as part of the City's case in chief or on rebuttal:

d. Graham Beal (Fact)

e. Marc Schwartz (Fact)

4. **The Retirement Systems' Witness List**

a. Cynthia Thomas, Executive Director of the Retirement Systems

b. Ryan Bigelow, Chief Investment Officer of the Retirement Systems

c. Eric Mendelsohn, Greenhill & Co., Financial Advisor to the Retirement Systems

d. Judy Kermans, Gabriel Roeder, Actuarial Advisor to the Retirement Systems

C. Objectors' Witnesses

1. The Objectors' witnesses are indicated in Attachments D - K.

2. Objectors reserve the right to seek court approval to supplement their witness lists as may be necessary to address modifications in the City's Plan, based on any rulings from the Court at the pretrial conference, or developments arising from the City's case in chief.

VII. EXHIBITS

A. General Reservations of Rights

1. The parties agree to provide each other with 48 business day hours notice prior to the use of demonstrative exhibits on direct examination of a witness and 24 business day hours notice prior to the use of demonstrative exhibits on cross examination of a witness. The parties agree that exhibits or other documents being used strictly for impeachment purposes do not need to be provided to the other side unless a party seeks to introduce an exhibit into evidence through a sponsoring witness on cross-examination.

2. Additionally, an *Order Approving Stipulation By and Between the City of Detroit, Michigan and the COPs Creditors Regarding Certain Facts and the Admission of Certain Exhibits for the Confirmation Trial* (July 14,

2014)[Dkt. 6002] reflects the agreement of certain parties (as reflected in the Order) with respect to certain facts and exhibits.

3. The parties have exchanged draft exhibit lists and objections and have worked together in an effort to admit documents into the record as to which there is no evidentiary dispute. The parties understand and agree that proposed exhibits as to which there are no objections indicated in this Order shall be admitted into evidence for all purposes and all parties. To the extent an exhibit appears more than once in the City's or Plan Supporters' exhibit lists, an objection asserted by an Objector to such an exhibit applies to all City or Plan Supporter copies. Similarly, an objection asserted by the City to any document on any Objector's exhibit list applies to all copies of that document on any other Objector's exhibit list.

4. The parties reserve the right to introduce any exhibit identified by any other party.

5. The parties reserve the right to amend or supplement the list of exhibits based on any rulings from the Court at the pretrial conference or otherwise.

B. Plan Supporters' Exhibits

1. The City's and the DIA Corp.'s exhibits, and the Objectors' objections to them, are described in Attachment A.

2. The Committee's exhibits, and the Objectors' objections to them, are described in Attachment B.

3. The Retirement Systems exhibits, and the Objectors' objections to them, are described in Attachment C.

C. Objectors' Exhibits and City's Objections

1. The Objectors' exhibits are described in Attachments D - K, as are the Plan Supporters' objections to those exhibits.

VIII. TRIAL

A. Non-jury

B. Estimated Length

Each side (the Plan Supporters being one side, and the Objectors being the other) is limited to 85 hours of trial time. The time used for the tour of the City by Judge Rhodes will be counted towards the Plan Supporter's allotted time.

ATTACHMENT A

CITY'S AND DIA CORP.'S EXHIBIT LIST WITH OBJECTORS' OBJECTIONS

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	1	7/29/2014	Fifth Amended Plan for the Adjustment of Debts of the City of Detroit (corrected)					
City	2	8/7/2014	Notice of Filing Plan Supplement: Exhibit I.A.103 (Form of DIA Settlement Documents)		Hearsay			
City	3	5/5/2014	Fourth Amended Disclosure Statement With Respect To Fourth Amended Plan for the Adjustment of Debts of the City of Detroit (Including Plan of Adjustment)					
City	4	12/30/2002	City of Detroit CAFR for the Fiscal Year Ended 6/30/2002					
City	5	12/30/2003	City of Detroit CAFR for the Fiscal Year Ended 6/30/2003					
City	6	3/25/2005	City of Detroit CAFR for the Fiscal Year Ended 6/30/2004					
City	7	5/13/2006	City of Detroit CAFR for the Fiscal Year Ended 6/30/2005					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	8	2/25/2008	City of Detroit CAFR for the Fiscal Year Ended 6/30/2006					
City	9	2/25/2009	City of Detroit CAFR for the Fiscal Year Ended 6/30/2007					
City	10	11/18/2009	City of Detroit CAFR for the Fiscal Year Ended 6/30/2008					
City	11	5/28/2010	City of Detroit CAFR for the Fiscal Year Ended 6/30/2009					
City	12	12/17/2010	City of Detroit CAFR for the Fiscal Year Ended 6/30/2010					
City	13	12/22/2011	City of Detroit CAFR for the Fiscal Year Ended 6/30/2011					
City	14	12/28/2012	City of Detroit CAFR for the Fiscal Year Ended 6/30/2012					
City	15	6/30/2014	City of Detroit CAFR for the Fiscal Year Ended 6/30/2013					
City	16	7/15/2013	Quarterly Report of the Emergency Manager for the Period April 2013 - June 2013 (July 2013)	Hearsay	Hearsay			
City	17	10/15/2013	Quarterly Report of the Emergency Manager for the Period July 2013 - September 2013 (October 2013)	Hearsay	Hearsay			
City	18	12/30/2013	Quarterly Report of the Emergency Manager for the Period September 2013 - November 2013 (December 2013)	Hearsay	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	19	1/15/2014	Quarterly Report of the Emergency Manager for the Period October 2013 - December 2013 (January 2014)	Hearsay	Hearsay			
City	20	3/28/2014	Quarterly Report of the Emergency Manager for the Period December 2013 - February 2014 (March 2014)	Hearsay	Hearsay			
City	21	4/15/2014	Quarterly Report of the Emergency Manager for the Period January 2014 - March 2014 (April 2014)	Hearsay	Hearsay			
City	22	02/00/2014	Triennial Budget 2015 - 2017		Hearsay			
City	23	6/27/2014	10-Year Plan of Adjustment Restructuring and Reinvestment Initiatives Bridge (June 2014)		Hearsay			
City	24	2/19/2014	Revenue Consensus Estimates and Projections (February 2014)		Hearsay			
City	25	02/00/2014	Financial Advisory Board Mid-Month Report (February 2014)		Hearsay			
City	26	2/19/2014	Comparison of Assumptions Underlying the Revenue Consensus and the Plan of Adjustment (February 2014)	Hearsay	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	27	10/00/2013	Revenue Forecast Memorandum for the Revenue Consensus Conference Prepared by Dr. Scorsone of Michigan State University (October 2013)	Hearsay	Hearsay	Hearsay		
City	28	2/27/2014	Financial Advisory Board Finance Subcommittee Meeting Agenda (February 2014)	Hearsay	Hearsay			
City	29	2/27/2014	Preliminary Revenue Consensus Conference Report (February 2014)		Hearsay			
City	30	02/00/2014	Graphs Depicting the Results of the Revenue Consensus Conference (February 2014)	Hearsay	Hearsay			
City	31	9/30/2013	Emergency Manager Report Pursuant to Section 17 of Local Financial Stability and Choice Act September 30, 2013	Hearsay	Hearsay			
City	32	4/9/2012	Financial Stability Agreement between the State of Michigan and the City of Detroit (April 9, 2012)		Hearsay			
City	33	6/14/2013	City of Detroit's Proposal for Creditors (June 2013)		Hearsay			
City	34	6/14/2013	Proposal for Creditors Executive Summary		Hearsay			
City	35	6/10/2013	Emergency Manager's Financial and Operating Plan (June 2013)		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	36	11/13/2012	Memorandum of Understanding City of Detroit Reform Program "Milestone Agreement"		Hearsay			
City	37	00/00/2014	Casino Revenue Summary for the Period July 2013 - June 2014 (May 2014)		Hearsay			
City	38	3/18/2014	Revenue Consensus Conference Report (March 2014)		Hearsay			
City	39	41681	City of Detroit: Draft 10-Year Plan of Adjustment Restructuring and Reinvestment Initiatives Potential Deferral Schedule (February 2014)		Hearsay			
City	40	5/30/2014	Comparison between Plan of Adjustment and Budget for Fiscal Year 2015 (May 2014)		Hearsay			
City	41	00/00/0000	City of Detroit: Restructuring Projects (Summary of Restructuring Projects for Fiscal Years 2015 - 2017 (June 2014))		Hearsay			
City	42	00/00/0000	Comparison of the Plan of Adjustment and Budget for Fiscal Years 2015 - 2017 (June 2014)		Hearsay			
City	43	5/12/2013	Emergency Manager, Financial and Operating Plan (May 12, 2013)		Hearsay			
City	44	2/7/2013	City of Detroit, Revenue Consensus Conference Final Report, Feb. 7, 2013		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	45	10/21/2013	Income Tax Division's Outstanding Accounts Receivable (October 2013)		Hearsay			
City	46	6/19/2014	Report of General Fund Budget-to-Actual Revenues and Expenditures for the Year-to-Date Ended March 31, 2014 (May 2014) - Narrative Analysis		Hearsay			
City	47	06/00/2014	Project Tracking List for the Office of the CFO (June 2014)		Hearsay			
City	48	3/31/2014	Draft Report of General Fund Budget-to-Actual Revenues and Expenditures for the Year-to-Date Ended March 31, 2014 (May 2014)		Hearsay			
City	49	3/31/2014	Draft FSA Report of General Fund Budget-to-Actual Revenues and Expenditures for the Year-to-Date Ended March 31, 2014 (May 2014)		Hearsay			
City	50	6/9/2014	Transcript Syndication of $120,000,000 City of Detroit Financial Recovery Bonds (June 2014)					
City	51	3/18/2014	Revenue Consensus Conference Report		Hearsay			
City	52	6/1/2014	Short Biography of John Hill (June 2014)	Hearsay	Hearsay			FRE 401, 403, 801
City	53	7/00/2014	Cost Savings by Fiscal Year - Version 1 (July 2014)		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	54	7/00/2014	Cost Savings by Fiscal Year - Version 2 (July 2014)		Hearsay			
City	55	7/00/2014	Revenue Initiatives by Fiscal Year (July 2014)		Hearsay			
City	56	9/26/2013	Post-Petition Financing Discussion	Hearsay	Hearsay			
City	57	7/5/2013	Letter from JP Morgan to Buckfire, et al, re Proposal for DIP Financing	Hearsay	Hearsay			FRE 801
City	58	5/9/2014	City of Detroit - Tentative 2014 State Equalized Value		Hearsay			
City	59	7/30/2014	Quality of Life Loan Business Case Request Summary		Hearsay			
City	60	5/13/2014	Emergency Manager's Office, City of Detroit: Plan for the Adjustment of Debts Summary Discussion Document	Hearsay	Hearsay			
City	61	11/26/2013	Financial Stability Agreement between the State of Michigan and the City of Detroit (November 26, 2014)		Hearsay			
City	62	10/29/2013	Grants Management and Revenue Opportunities		Hearsay			
City	63	12/00/2012	Detroit Future City: Detroit Strategic Framework Plan	Hearsay	Hearsay			
City	64	00/00/0000	Incremental Headcount for the Budget, Finance, and ITS Departments (May 2014)		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	65	12/30/2013	Human Resources Department Technology Assessment (December 2013)		Hearsay			
City	66	1/9/2014	Craig, Detroit Police Plan of Action POA00318308-415		Hearsay			
City	67	2/8/2014	Rapson: "Detroit Future Cities Plan"	Relevance; Hearsay	Hearsay; relevance.	Hearsay		FRE 801
City	68	10/20/2009	Rapson: Overarching Objectives	Relevance; Hearsay	Hearsay; relevance.	Hearsay		FRE 801
City	69	2/5/2014	Rapson: Restructuring Public Services	Relevance; Hearsay	Hearsay; relevance.	Hearsay		FRE 801
City	70	2/5/2014	Rapson: Sources of Long-Term Debt	Relevance; Hearsay	Hearsay; relevance.	Hearsay		FRE 801
City	71	2/4/2014	Rapson: Detroit	Relevance; Hearsay	Hearsay; relevance.	Hearsay		FRE 801
City	72	6/27/2014	Emergency Manager Order No. 27 Establishing Grants Management Department (June 2014)	Hearsay	Hearsay			
City	73	05/00/2014	Detroit Blight Removal Task Force Plan - Every Neighborhood Has a Future and It Doesn't Include Blight	Hearsay	Hearsay	Hearsay		FRE 801
City	74	12/7/2012	Detroit Fire Department Apparatus Division; Penske Comments	Hearsay	Hearsay			
City	75	7/9/2014	Office of Grants Management		Hearsay			
City	76	12/00/2012	Detroit Future City: Detroit Strategic Framework Plan - Executive Summary	Hearsay	Hearsay	Hearsay		

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	77	12/31/2013	The Kresge Foundation, Annual Report 2013	Relevance	Hearsay; relevance.	Hearsay		FRE 401, 403, 801
City	78	8/7/2014	Goobing Detroit	Hearsay; Relevance; Authenticity	Hearsay; relevance	Hearsay		FRE 401, 403, 801
City	79	Undated	General Retirement System - Retirement Bonus		Hearsay			FRE 801
City	80	Undated	City of Detroit, General Retirement System, Distribution of Excess Earnings History		Hearsay			FRE 801
City	81	Undated	General Retirement System, Annuity Savings Fund		Hearsay			FRE 801
City	82	00/00/2012	Southeast Michigan Council of Governments, Forecasts for Population and Employment Change, Scenario 1a (2012)		Hearsay			
City	83	9/4/2013	Letter of Intent to Contract for Services between Michigan Municipal Services Authority and City of Detroit (Purchased services, benefits processing II	Hearsay	Hearsay			
City	84	10/31/2013	Letter of Intent to Contract for services between Michigan Municipal Services Authority and City of Detroit (Purchased services, benefits processing)	Hearsay	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	85	7/18/2013	Interagency Agreement between City of Detroit / Detroit Police Department and the Michigan Department of Corrections for the City of Detroit Detention Center (Purchased services, MI Department of Corrections)					
City	86	4/11/2013	GSD Cost Elimination with Solid Waste Outsourcing		Hearsay			
City	87	4/30/2014	10 year Financial Projections Department of Transportation (DDOT)		Hearsay			
City	88	5/7/2014	City of Detroit: 2008 - 2013 Comprehensive Analysis of All City Agencies and Funds, Revenues & Expenses as of June 30th		Hearsay			
City	89	4/23/2014	Congressional Budget Office - 2013 Long term budget outlook inflation projections 2013-2088		Hearsay			
City	90	12/20/2013	Bureau of Economic Analysis, Price Indexes for Gross Domestic Product (1992 - 2012)		Hearsay			
City	91	1/8/2014	40 Yr Projections - Revenue and Dept Summary Overview (01.08.2014)		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	92	5/6/2014	Congressional Budget Office 2013-23- Key variable from 2/2013 Report The Budget and Economic Outlook: Fiscal Years 2013 to 2023 (Property Taxes)		Hearsay			
City	93	5/27/2014	City of Detroit: Hypothetical Art Proceeds		Hearsay			
City	94	5/27/2014	City of Detroit: State Settlement Contribution (Present Value Calculation)		Hearsay			
City	95	3/3/2014	Baird, Municipal Market Weekly (03.03.2014)		Hearsay	Hearsay		FRE 801
City	96	11/18/2013	Inflow/Outflow Report 2002 - 2010 (Census On the Map data Detroit worker flow (2002-2012))		Hearsay			
City	97	00/00/0000	Project Piston: Ten year Plan - Preliminary Draft v.1.4 (Income Tax Revenue Calculations)		Hearsay			
City	98	5/15/2013	Michigan; Economic & Revenue Forecasts FY 2013, 2014, 2015 Presentation		Hearsay			
City	99	5/15/2013	Michigan; Administration Estimates Michigan Economic & Revenue Outlook FY 2013, 2014, 2015		Hearsay			
City	100	4/1/2012	SEMCOG 2040 Forecast Summary (April 2012)		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	101	5/13/2013	Senate Fiscal Agency, Michigan's Economic Outlook and Budget Review, FY 2012-2013, 2013-2014, 2014-2015		Hearsay			
City	102	5/1/2013	US Bureau of Labor Statistics, Local Area Unemployment Statistics, Detroit, MI (1990 - 2013)		Hearsay			
City	103	4/21/2014	Michigan Department of Treasury, FY 2013-2014 State Revenue Sharing Amounts		Hearsay			
City	104	4/21/2014	Michigan Department of Treasury, FY 2014-2015 State Revenue Sharing Amounts		Hearsay			
City	105	11/3/2013	Deaft letter from Taranto to Miller (Nov. 3, 2013) re City of Detroit Active Health Plan Projections	Hearsay	Hearsay			
City	106	4/8/2014	Letter from Gerbino (Barclay's Bank) to City of Detroit re Post-petition financing - Bond Purchase Agreement	Hearsay	Hearsay			
City	107	4/8/2014	Financial Recovery Bond Trust Indenture Between Detroit and UMB Bank, N.A. (Post-petition financing - Trust Indenture)					
City	108	7/2/2014	10-Year Plan of Adjustment Restructuring and Reinvestment Initiatives (June 2014)		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	109	7/0/2014	10-Year Plan of Adjustment Financial Projections (July 2014)		Hearsay			
City	110	7/1/2014	40-Year Plan of Adjustment Financial Projections Bridge (July 2014)		Hearsay			
City	111	7/2/2014	40-Year Plan of Adjustment Financial Projections (July 2014)		Hearsay			
City	112	00/00/0000	10-Year Plan of Adjustment (working model)		Hearsay			
City	113	00/00/0000	40 Year Plan of Adjustment Financial Projections (working model)		Hearsay			
City	114	03/00/2012	Frey, Population Growth in Metro America since 1980: Putting the Volatile 2000s in Perspective, Metropolitan Policy Program at Brookings (March 2012)		Hearsay	Hearsay		
City	115	N/A	N/A		Hearsay	Hearsay		
City	116	4/15/2014	Memorandum from Miller, Canfield, Paddock and Stone, PLC to City of Detroit UTGO Bond Insurers re: Real Property Tax Collection and Enforcement in the City of Detroit (Apr. 23, 2014)	Hearsay	Hearsay			
City	117	00/00/0000	City of Detroit Treasury Division's Operational Recommendations (November 2013)		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	118	4/5/2011	2011 Ad Valorem and Special Acts - STC Assessment Roll Certification (Board of Review)		Hearsay			
City	119	4/2/2012	2012 Ad Valorem STC Asssessment Roll Certification (Board of Review) with "Ad Valorem Parcels" Reports		Hearsay			
City	120	4/1/2013	2013 Ad Valorem and Special Acts STC Asssessment Roll Certification (Board of Review)		Hearsay			
City	121	00/00/2013	2012 - 2013 Budget Ad Valorem Tax Levies and Tax Rates		Hearsay			
City	122	11/18/2013	Changes to Detroit Property Tax Forecasts (11.18.2013)		Hearsay			
City	123	2/24/2014	Changes to Detroit Property Tax Forecasts (2.24.2014)		Hearsay			
City	124	00/00	Data Sources for Property Tax Projections - Sallee spreadsheet	Hearsay	Hearsay			
City	125	2/5/2013	2007 - 2011 Detroit Property Tax Collection Rates		Hearsay			
City	126	00/00/2013	FY13 Wayne County Revolving Fund Settlement		Hearsay			
City	127	4/8/2014	Major Tax Payers (commercial & industrial)		Hearsay; relevance			
City	128	5/27/2014	Property Tax Estimating Methodology (Version 1)		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	129	00/00/0000	2012-2023 Property Tax Revenue Projections		Hearsay			
City	130	1/23/2014	City of Detroit, Renaissance Zone Taxable Values (2012-2013)		Hearsay			
City	131	2/11/2014	City of Detroit, Renaissance Zone Taxable Values (2012-2013)		Hearsay			
City	132	1/8/2014	Memorandum, Detroit Revenue Extrapolation—2024-2053 (Jan. 8, 2014)	Hearsay	Hearsay	Hearsay		
City	133	7/23/2014	House Fiscal Agency, Economic Vitality Incentive Program (July 23, 2013)		Hearsay			
City	134	2/5/2013	City of Detroit, Property Tax Collection Summaries by Class (2007-2011)		Hearsay			
City	135	3/0/2014	Plante Moran, Michigan Personal Property Tax Changes (Mar. 2014)		Hearsay	Hearsay		
City	136	Various	Wayne County, 2004 to 2007 Revolving Fund Net Payment Summaries		Hearsay			
City	137	00/00/2008	Wayne County, City of Detroit 2008 Revolving Fund Net Payment Summary (native) [not an exact duplicate of 2549652]		Hearsay			
City	138	00/00/2010	2010 Net Revolving Fund Distribution (native)		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	139	06/00/2012	Wayne County, Detroit Summaries of June 2012 Monthly Settlement		Hearsay			
City	140	06/00/2013	Wayne County, Detroit Summary of June 2013 Monthly Settlement (native)		Hearsay			
City	141	6/19/2014	Miscellaneous Totals/Statistics Report: "Ad Valorem Parcels minus Ren Zone"		Hearsay			
City	142	00/00/0000	FRED Graph Observations Federal Reserve Economic Data Link: p://research.stlouisfed.org/fred2 Help: http://research.stlouisfed.org/fred2/help-faq Economic Research Division Federal Reserve Bank of St. Louis DEXRSA Home Price Index for Detroit, Michigan (DEXRSA), Index January 2000 = 100, Monthly, Seasonally Adjusted		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	143	00/00/0000	Annual; Privately-Owned Residential Building Permits, Wayne County, MI Census, Building Permits Survey http://www.census.gov/construction/bps/		Hearsay			
City	144	00/00/0000	City of Detroit From State Tax Commission http://www.michigan.gov/treasury/0,1607,7-121-1751_2228_21957_45819---,00.html		Hearsay			
City	145	00/00/0000	Michigan Association of Realtor Data Detroit Realtors (1995 - 2914) http://www.mirealtors.com/content/housingstatistics.htm		Hearsay			
City	146	1/27/2014	Williams, "Drop Dead, Detroit!," The New Yorker (Jan. 27, 2014) at http://www.newyorker.com/magazine/2014/01/27/drop-dead-detroit	Hearsay; Relevance.	Hearsay	Hearsay	Document is not relevant and is outweighed by its danger of unfair prejudice.	FRE 401, 403, 801

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	147	00/00/2012	Michigan State Tax Commission, Assessed & Equalized Valuation (2000-2012), available at http://www.michigan.gov/treasury/0,1607,7-121-1751_2228_21957_45818---,00.html.		Hearsay			
City	148	00/00/2012	Michigan State Tax Commission, Taxable Valuation (2000-2012), available at http://www.michigan.gov/treasury/0,1607,7-121-1751_2228_21957_45819---,00.html.		Hearsay			
City	149	04/00/2001	Rebecca Ross, Consensus Revenue Estimating: The Process, Fiscal Forum (Apr. 2001)		Hearsay	Hearsay		FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	150		U.S. Census Bureau, Statistical Abstract of the United States: 2012, Table 20: Large Metropolitan Statistical Areas—Population: 1990 to 2010, available at http://www.census.gov/prod/2011pubs/12statab/pop.pdf.		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	151		House Fiscal Agency, Economic Outlook and Revenue Estimates for Michigan, (May 2013, Jan. 2014, May 2014), available at http://www.house.michigan.gov/hfa/revenue.asp		Hearsay			
City	152	02/00/2013	Congressional Budget Office, The Budget and Economic Outlook: Fiscal Years 2013 to 2023 (Feb. 2013), available at http://www.cbo.gov/sites/default/files/cbofiles/attachments/43907-BudgetOutlook.pdf.		Hearsay; relevance.			
City	153	00/00/0000	Michigan Association of Realtors, Residential Sales Statistics (2002 - 2014		Hearsay			
City	154	07/00/2014	S&P/Case-Shiller Home Price Indices Methodology		Hearsay			
City	155	00/00/0000	Michigan Population by County (1990 - 2013)		Hearsay			
City	156	7/22/2014	BLS News Release, "Consumer Prive Index, Detroit - AnnArbor - Flint - June 2014		Hearsay			
City	157	00/00/00	Michigan Population by County (1990 - 2013)		Hearsay			
City	158	11/13/2013	Evanko Sales Study Data: Copy of ARMS-Bank-Invstr	Hearsay	Hearsay			FRE 701, 702, 801, FRCP

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
								26(a)(2)
City	159	11/21/2013	Evanko Sales Study Data: Res Sales Study	Hearsay	Hearsay			FRE 701, 702, 801, FRCP 26(a)(2)
City	160	12/15/2013	Memo from Evanko to File re Detroit Residential Sales Ratio Procedures	Hearsay	Hearsay			FRE 701, 702, 801, FRCP 26(a)(2)
City	161	00/00/0000	Chart re "2013 MBOR AV" and "2014 TCV"		Hearsay			
City	162	11/18/2013	City of Detroit Residential 10/1/2012 through 9/30/2013: Distribution - Summary - Ratio with Factored AV		Hearsay			
City	163	00/00/2013	24 and 12 Month Sales Ratio Study for Determining the 2014 Starting Base - Commercial Sales Study (Form L-4017 for 2013)		Hearsay			
City	164	1/0/1900	24 and 12 Month Sales Ratio Study for Determining the 2014 Starting Base - Industrial Sales Study (Form L-4017 for 2013)		Hearsay			
City	165	00/00/2013	Analysis for Equalized Valuation - Real Property State Tax Commission for Wayne County, City of Detroit (2013-2014)		Hearsay			
City	166	00/00/0000	Chart re "2013 MBOR AV," "Parcel Count," and "Factor Change"		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	167	N/A	N/A		Hearsay	Hearsay		FRE 701, 702, 801, FRCP 26(a)(2)
City	168	12/8/2013	Memorandum from Naglick, Evanko and Horhn to Michigan Department of Treasury (Dec. 8, 2013) re Assessing Division Corrective Action Plan	Hearsay	Hearsay	Hearsay		FRE 701, 702, 801, FRCP 26(a)(2)
City	169	5/20/2014	Wolinski and Co., CPA, POC Allocation Memo; Executive Summary: Accounting and Financial Reporting for Taxable Pension Obligation Certificates of Participation		Hearsay			FRE 701, 702, 801, FRCP 26(a)(2)
City	170	5/15/2014	Department of Health Memorandum to Mayor Duggan on the Plan of Adjustment (May 2014)	Hearsay	Hearsay			FRE 701, 702, 801, FRCP 26(a)(2)
City	171	5/19/2014	Municipal Parking Department Memorandum to Mayor Duggan on the Plan of Adjustment (May 2014)	Hearsay	Hearsay			FRE 701, 702, 801, FRCP 26(a)(2)
City	172	5/20/2014	Collection of Department Memoranda to Mayor Duggan on the Plan of Adjustment (May 2014)	Hearsay	Hearsay			FRE 701, 702, 801, FRCP 26(a)(2)
City	173	5/22/2014	Updated Schedule of Department Memoranda to Mayor Duggan on the Plan of Adjustment (May 2014)	Hearsay	Hearsay.			FRE 701, 702, 801, FRCP 26(a)(2)

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	174	5/19/2014	Buildings, Safety Engineering & Environmental Department Memorandum to Mayor Duggan on the Plan of Adjustment (May 2014)	Hearsay	Hearsay			FRE 701, 702, 801, FRCP 26(a)(2)
City	175	5/18/2014	Department of Administrative Hearings Memorandum to Mayor Duggan on the Plan of Adjustment (May 2014)	Hearsay	Hearsay			FRE 701, 702, 801, FRCP 26(a)(2)
City	176	5/20/2014	Fire Department Memorandum to Mayor Duggan on the Plan of Adjustment (May 2014)	Hearsay	Hearsay			FRE 701, 702, 801, FRCP 26(a)(2)
City	177	5/2/2013	Emergency Manager Order 6 - Approval of Initial Funding Agreement for the PLA		Hearsay			
City	178	9/24/2013	DWSD 10-Year CIP - OHM Report		Hearsay			FRE 801
City	179	12/20/2103	Response to DWSD 10-Year Capital Impreovement Plan		Hearsay			FRE 801
City	180	12/21/2010	City of Detroit Sewage Disposal Fund Basic Financial Statements for the year ended 6/30/2010					
City	181	12/22/2011	City of Detroit Sewage Disposal Fund Basic Financial Statements for the year ended 6/30/2011					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	182	12/28/2012	City of Detroit Sewage Disposal Fund Basic Financial Statements for the year ended 6/30/2012					
City	183	12/21/2010	City of Detroit Water Fund Basic Financial Statements for the year ended 6/30/2010					
City	184	12/22/2011	City of Detroit Water Fund Basic Financial Statements for the year ended 6/30/2011					
City	185	12/28/2012	City of Detroit Water Fund Basic Financial Statements for the year ended 6/30/2012					
City	186	3/25/2014	Barclays Response to Request for Proposal - Underwriting Services, to State of Michigan Department of Treasury	Hearsay	Hearsay			
City	187	3/25/2013	Citigroup Response to Request for Proposal for Underwriting Services to State of Michigan Michigan Finance Authority (on behalf of the City of Detroit and the Detroit Water & Sewerage Department)	Hearsay	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	188	3/25/2014	Goldman Sachs Response to Request for Proposal for Underwriting Services to Michigan Finance Authority (on behalf of the City of Detroit and the Detroit Water & Sewerage Department)	Hearsay	Hearsay			
City	189	3/25/2014	JP Morgan Response to Request for Proposal for Underwriting Services to Michigan Finance Authority (on behalf of the City of Detroit and the Detroit Water & Sewerage Department)	Hearsay	Hearsay			
City	190	3/25/2014	Siebert Brandford & Shank Response to Request for Proposal for Underwriting Services to Michigan Finance Authority (Detroit Water & Sewerage Department)	Hearsay	Hearsay			
City	191	00/00/0000	DWSD Pro Fee Allocation (Version 1)	Foundation	Hearsay		We are unable to determine the authenticity of this document.	
City	192	12/18/2014	FY 2015 Sewage Disposal Capital Improvement BOWC Approved December 18, 2014		Hearsay			
City	193	12/18/2013	FY 2015 Water Supply System Capital Improvement Program BOWA Approved December 18, 2014		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	194	6/20/2011	DWSD Sewage Disposal System, Series 2012-A Senior Lien Bond Official Statement					
City	195	12/20/2011	DWSD Water Supply System Series 2011-C Senior Lien Bond Official Statement					
City	196	1/8/2014	Barclays Presentation to Miller Buckfire	Hearsay	Hearsay	Hearsay		
City	197	7/0/2014	Bloomberg Curve Indices (July 2014)	Hearsay	Hearsay			
City	198	7/0/2014	Bloomberg Issuance Data (July 2014)	Hearsay	Hearsay			
City	199	7/0/2014	Bloomberg MMA Curve (July 2014)	Hearsay	Hearsay			
City	200	7/0/2014	EMMA Statistical Data (July 2014)	Hearsay	Hearsay			
City	201	7/11/2014	City of Detroit: DWSD - Estimated Legacy Cost Savings as a Result of Plan of Adjustment	Hearsay	Hearsay			FRE 801
City	202	7/11/2014	City of Detroit: DWSD - Estimated Legacy Cost Savings as a Result of Plan of Adjustment	Hearsay	Hearsay			FRE 801
City	203	Undated	Transcript of conversation between Kyle Herman and Bloomberg Help Desk	Hearsay	Hearsay	Hearsay	We are unable to determine the authenticity of this document.	FRE 801
City	204	Undated	Conway MacKanzie, DWSD "Working" Model	Hearsay	Hearsay			FRE 801

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	205	7/9/2014	FY 2015 Sewage Disposal Capital Improvement BOWC Approved July 9, 2014		Hearsay			
City	206	02/00/2014	36th District Court Internal Control Procedures Evaluation (February 2014)	Hearsay	Hearsay			
City	207	6/27/2014	Master Agreement Between the City of Detroit and the Association of City of Detroit Supervisors 2014 2018, dated June 27, 2014.					
City	208	6/17/2014	Master Agreement Between the City of Detroit and Local 1206 of the American Federation of State County and Municipal Employees, AFL-CIO (Detroit Forestry and Landscape Foreman's Union) 2014 2018, dated June 17, 2014.					
City	209	6/27/2014	Master Agreement Between the City of Detroit and Local 1863 of the American Federation of State County and Municipal Employees, AFL-CIO (Detroit Civilian Crossing Guards) 2014 2018, dated June 27, 2014					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	210	6/27/2014	Master Agreement Between the City of Detroit and Local 2394 of the American Federation of State County and Municipal Employees, AFL-CIO (Supervisory Unit) 2014 2018, dated June 27, 2014.					
City	211	6/27/2014	Master Agreement Between the City of Detroit and Local 542 of the American Federation of State County and Municipal Employees, AFL-CIO (Motor City Seasonals) 2014 2018, dated June 27, 2014.					
City	212	6/27/2014	Master Agreement Between the City of Detroit and Local 6087 of the American Federation of State County and Municipal Employees, AFL-CIO (Paving Forepersons) 2014 2018, dated June 27, 2014.					
City	213	5/00/2014	Master Agreement Between the City of Detroit and Michigan Council 25 of the American Federation of State, County and Municipal Employees, AFL-CIO (Non-Supervisory Bargaining Unit) 2014 2018.					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	214	5/27/2014	Master Agreement Between the City of Detroit and the Senior Accountants, Analysts and Appraisers Association 2014 2018, dated May 27, 2014					
City	215	6/25/2014	Master Agreement Between the City of Detroit and the Service Employees International Union Local 517-M (Non-Supervisory Unit) 2014 2018, dated June 25, 2014.					
City	216	6/25/2014	Master Agreement Between the City of Detroit and the Service Employees International Union Local 517-M (Professional and Technical Unit) 2014 2018, dated June 25, 2014					
City	217	6/25/2014	Master Agreement Between the City of Detroit and the Service Employees International Union Local 517-M (Supervisory Unit) 2014 2018, dated June 25, 2014.					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	218	5/1/2014	Master Agreement Between the City of Detroit and the Michigan Building and Construction Trades Council 2014 2018, dated May 1, 2014					
City	219	6/30/2014	Memorandum of Agreement between the Detroit Water and Sewerage Department and the Michigan Building & Construction Trades Council to amend their June 26, 2013 June 30, 2016 collective bargaining agreement.					
City	220	6/30/2014	Memorandum of Agreement between the Detroit Water and Sewerage Department and the International Union of Operating Engineers, Local 324 to amend their March 25, 2013 June 30, 2022 collective bargaining agreement					
City	221		2014 2016 Master Agreement Between the Detroit Water & Sewerage Department and the Detroit Senior Water Systems Chemists Association					
City	222		2014 2019 Master Agreement Between the DWSD and Teamsters State, County and Municipal Workers, Local 214.					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	223		2012 2018 Master Agreement Between the Detroit Water & Sewerage Department and AFSCME, Michigan Council 25 Local 2920, dated					
City	224	3/26/2013	Master Agreement between the Detroit Water & Sewerage Department and the Utility Workers of American, Local 504					
City	225	3/26/2013	Master Agreement between the Detroit Water & Sewerage Department and the Utility Workers of American, Local 488 and 531					
City	226	4/26/2014	2013 2020 Master Agreement Between the Detroit Water & Sewerage Department and the Association of Professional Construction Inspectors, dated March 26, 2013					
City	227	3/25/2014	2013 2022 Master Agreement Between the Detroit Water & Sewerage Department and the I.U.O.E., Local 324 – Operating Engineers, Detroit Principal Clerks & Park Management Units, dated March 25, 2014					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	228	2/7/2014	Master Agreement Between the Assistant Supervisors of Street Maintenance and Construction and the City of Detroit 2014 2018					
City	229	4/1/2014	Master Agreement Between the City of Detroit and the Michigan Building and Construction Trades Council 2014 2018, dated April 1, 2014					
City	230	6/18/2014	Master Agreement between the City of Detroit and the Detroit Police Command Officers Association 2014 - 2019					
City	231		Master Agreement Between the City of Detroit and the Detroit Police Lieutenants and Sergeants Association 2014 2019.					
City	232	6/19/2014	Tentative Agreement Between the City of Detroit and the Detroit Police Lieutenants and Sergeants Association, dated June 19, 2014		Hearsay			
City	233	6/11/2014	Master Agreement Between the City of Detroit and the Emergency Medical Service Officers Association 2014 2019, dated June 11, 2014					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	234	12/18/2013	Master Agreement Between the City of Detroit and the International Union of Operating Engineers IUOE Local 324 2013 2018, dated December 18, 2013					
City	235	12/18/2013	Master Agreement Between the City of Detroit and the International Union of Operating Engineers IUOE Local 324 (Park Management) 2013 2018, dated December 18, 2013					
City	236	12/18/2013	Master Agreement Between the City of Detroit and the International Union of Operating Engineers IUOE Local 324 (Principal Clerks) 2013-2018, dated December 18, 2013					
City	237	11/12/2013	Master Agreement Between the City of Detroit and the Police Officers Association of Michigan POAM, 2013 2018, dated November 12, 2013					
City	238	12/18/2013	Supplemental Agreement Between the City of Detroit Police Department and Teamsters State, County and Municipal Workers, Local 214 2013 2018, dated December 18, 2013					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	239	12/18/2013	Supplemental Agreement Between the Department of Public Works and Teamsters Local 214 2013 2018, dated December 18, 2013					
City	240	12/18/2013	Supplemental Agreement Between the General Services Department and Teamsters Local 214 2013 2018, dated December 18, 2013					
City	241	12/18/2013	Supplemental Agreement between the City of Detroit Municipal Parking Department and Local #214 Teamsters State, County and Municipal Workers, 2013 2018, dated December 18, 2013					
City	242	12/18/2013	Master Agreement Between the City of Detroit and the International Brotherhood of Teamsters Local 214 2013 2018, dated December 18, 2013					
City	243	6/20/2014	Master Agreement Between the City of Detroit and the Association of Municipal Inspectors 2014 2018, dated June 20, 2014					
City	244		Master Agreement Between the City of Detroit and the Detroit Income Tax Investigators Association 2014 2018.					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	245	6/26/2013	Master Agreement between the Detroit Water & Sewerage Department and the Building Trades Forement 2013 2016					
City	246	Undated	City of Detroit, Corrective Disciplinary Action Guidelines & Attendance Policy					
City	247	7/22/2014	Master Agreement Between the City of Detroit and the Association of Professional and Technical Employees 2014 2018, dated July 22, 2014					
City	248	6/26/2013	Master Agreement Between the Detroit Water & Sewerage Department and the Michigan Building and Construction Trades Council 2013 2016, dated May 1, 2014					
City	249	12/12/1997	Exhibit 2 to Operating Agreement between the City of Detroit and Founders Society Detroit Institute of Arts dated Dec. 12, 1997					
City	250	4/7/1969	Robert H. Tannahill Foundation Trust Agreement, dated Apr. 7, 1969					
City	251	4/7/1969	Codicil to the Last Will and Testament of Robert Hudson Tannahill, dated Apr. 7, 1969					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	252	3/10/1966	Last Will and Testament of Robert Hudson Tannahill, dated March 10, 1966					
City	253	6/24/1969	Last Will and Testament of W. Hawkins Ferry					
City	254	12/12/1997	Operating Agreement for the DIA between the City of Detroit and Founders Society (executed)					
City	255	12/12/1997	Exhibit 5 to Operating Agreement between the City of Detroit and Founders Society Detroit Institute of Arts dated Dec. 12, 1997					
City	256	6/30/2001	DIA Financial Statement dated year ended June 30, 2001					
City	257	6/30/2004	DIA Financial Statement dated year ended June 30, 2004					
City	258	6/30/2005	DIA Financial Statement dated year ended June 30, 2005					
City	259	6/30/2006	DIA Financial Statement dated year ended June 30, 2006					
City	260	6/30/2007	DIA Financial Statement dated year ended June 30, 2007					
City	261	6/30/2008	DIA Financial Statement dated year ended June 30, 2008					
City	262	6/30/2009	DIA Financial Statement dated year ended June 30,					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
			2009					
City	263	6/30/2010	DIA Financial Statement dated year ended June 30, 2010					
City	264	6/30/2011	DIA Financial Statement dated year ended June 30, 2011					
City	265	6/30/2012	DIA Financial Statement dated year ended June 30, 2012					
City	266	6/30/2013	DIA Financial Statement dated year ended June 30, 2013					
City	267	2/13/2012	DIA Collections Management Policy (updated 02/13/2012)					
City	268	1/9/1961	Minutes of Arts Commission Meeting dated January 9, 1961					
City	269	1/27/1920	Board Minutes of the Trustees of the Detroit Museum of Art					
City	270	4/17/1944	Founders Society Trustees' Board Minutes dated Apr. 17, 1944					
City	271	12/6/1948	DIA Board resolution dated December 6, 1948					
City	272	10/4/1955	Washington Allston, "Belshazzar's Feast," correspondence and related documents	Misleading - compilation of various documents. Hearsay				

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	273	4/30/1993	Letter from Millicent Hall Gaudieri dated April 30, 1993	Hearsay				
City	274	9/30/1992	DIA Collections Management Policy, Arts Commission Accepted 9/30/1992					
City	275	9/15/1927	Last Will and Testament of Ralph H. Booth dated Sept. 15, 1927					
City	276	10/6/1927	Codicil to the Last Will and Testament of Ralph H. Booth dated Oct. 6, 1927					
City	277	4/23/1930	Codicil to the Last Will and Testament of Ralph H. Booth dated Apr. 23, 1930					
City	278	4/21/1942	Letter from Mrs. Ralph Harman Booth dated Apr. 21, 1942					
City	279	3/6/1916	Letter from Charles L. Freer dated March 6, 1916	Hearsay				
City	280	2/8/1973	Minutes of Arts Commission dated February 8, 1973					
City	281	5/15/1984	Agreement between City of Detroit and Founders Society Detroit Institute of the Arts dated May 15, 1984					
City	282	1/27/1987	Letter from John L. Booth II dated Jan. 27, 1987	Misleading -- Compilation of documents. Hearsay				

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	283	8/7/1972	Letter from Edward E. Rothman dated Aug. 7, 1972	Hearsay				
City	284	11/9/1992	News Release dated Nov. 9, 1992					FRE 801
City	285	2/6/1992	Josephine F. Ford Deed of Gift and accompanying correspondence for Van Gogh, “Roulin, the Postman”	Misleading - compilation of various documents.				
City	286	1/1/1919	1919 Act					
City	287	2/17/1988	Deaccession Policy and Procedures, Revised 2/17/1988					
City	288	1/3/1990	Letter from Samuel Sachs II dated January 3, 1990	Hearsay				
City	289	5/15/1989	Statement by Samuel Sachs II dated May 15, 1989	Misleading - compilation of various documents.				
City	290	1/23/1991	Statement of Samuel Sachs II dated Jan. 23, 1991	Hearsay				
City	291	4/11/1932	Letter from Clyde H. Burroughs dated April 11, 1932					
City	292	7/1/1990	DIA Guidelines for Professional Practices dated July 1990					
City	293	00/00/0000	Museum Collection Data		Hearsay			
City	294	12/15/1967	Letter from Edward E. Rothman to Willis F. Woods dated Dec. 15, 1967					
City	295	8/6/2014	DIA List of Complete Works		Hearsay			
City	296	5/23/1910	Merrill Fund					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	297	10/8/1927	Detroit News article dated Oct. 8, 1927	Hearsay; Illegible.				FRE 801
City	298	2/3/1933	Letter from Edsel B. Ford dated Feb. 3, 1933					
City	299	2/8/1974	Letter from Frederick J. Cummings dated Feb. 8, 1974					
City	300	10/4/2010	AAMD Policy on Deaccessioning dated June 9, 2010 (amended by Board on Oct 4, 2010)		Hearsay			
City	301	Undated	City/State Support Spreadsheet	Hearsay; Foundation	Hearsay			
City	302	1/11/1982	Joint Legislative Hearing on the Arts transcript dated January 11, 1982	Hearsay				
City	303	3/15/2014	Email from Wong to Spencer re Detroit - DIA Catalogue of Information	Hearsay	Hearsay			
City	304	3/27/2014	Email from Spencer to Wong re Sample Indication of Interest - HL Initial Response	Hearsay	Hearsay			
City	305	4/1/2014	Email from Bell to Spencer re Additional IOI Break Up Fee Language	Hearsay	Hearsay			
City	306	4/10/2014	Email from Spencer to Liu re DIA - IOI Follow-Up/Status Check	Hearsay	Hearsay			
City	307	5/6/2014	Email from Peck to Popehn re Specific Relief Request	Hearsay	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	308	00/00/0000	Wiener Expert Appraisal Comparison Spreadsheet Reviewed at Deposition	Hearsay	Hearsay			
City	309	Undated	DIA memo, "Selling the Detroit Institute of Arts Collection to Satisfy the City's Creditors: Legal and Practical Constraints"	Hearsay	Hearsay			
City	310	12/16/2013	DIA spreadsheet, "Restricted Donations"	Hearsay; Foundation	Hearsay			
City	311	12/5/2013	DIA spreadsheet, "Bequest of Robert H. Tannahill"	Hearsay; Foundation	Hearsay			
City	312	Undated	DIA list, "Contemporary Funds Restricted to Art Acquisition Only"	Hearsay; Foundation	Hearsay			
City	313	12/11/2013	DIA spreadsheet, "Contemporary Art with Donor Restrictions"	Hearsay; Foundation	Hearsay			
City	314	10/15/1998	10/15/1998 memo from trustee for John Gutmann revocable living trust to DIA re: distributive terms of the trust relating to gift	Hearsay	Hearsay			
City	315	12/6/2103	DIA checklist, "Restricted Gifts - Bequest of John Gutmann"	Hearsay; Foundation	Hearsay			
City	316	1/28/1997	Yousuf Karsh Deed of Gift (unexecuted by DIA)	Hearsay; Foundation	Hearsay			
City	317	12/6/2013	DIA checklist, "Restricted Gifts Checklist - Karsh (photographs)"	Hearsay; Foundation	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	318	12/5/2013	DIA spreadsheet, "Robert H. Tannahill Foundation Fund Purchases"	Hearsay; Foundation	Hearsay			
City	319	12/5/2013	DIA spreadsheet, "Purchases with Funds in Full or Part from Robert Tannahill (included: works by exchange)"	Hearsay; Foundation	Hearsay			
City	320	3/1/2011	DIA deaccession history for Robert H. Tannahill	Hearsay; Foundation	Hearsay			
City	321	1/5/1922	Historical documents relating to Tintoretto's "The Dreams of Men"					
City	322	1/5/1933	Specifications regarding Tintoretto's "The Dreams of Men"					
City	323	12/6/2013	DIA contemporary file on Tintoretto's "The Dreams of Men"		Hearsay			
City	324	6/13/2013	Michigan Attorney General Opinion No. 7272 re: Conveyance or Transfer of DIA Collection	Hearsay	Hearsay	Hearsay; Legal Opinion		
City	325	1/28/1998	01/28/1998 Certificate of Assumed Name for Detroit Institute of Arts					
City	326	1/28/1998	01/28/1998 Certificate of Assumed Name for Detroit Institute of Arts, Inc.					
City	327	1/28/1998	01/28/1998 Certificate of Assumed Name for Detroit Institute of Arts Founders Society					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	328	1/28/1998	01/28/1998 Certificate of Assumed Name for Founders Society Detroit Institute of Arts					
City	329	2/19/1998	02/19/1998 Certificate of Assumed Name for The Detroit Institute of Arts					
City	330	1/28/1998	01/28/1998 Certificate of Assumed Name for The Detroit Institute of Arts Founders Society					
City	331	9/30/1992	09/30/1992 Certificate of Assumed Name for The Detroit Institute of Arts Founders Society					
City	332	1/28/1998	01/28/1998 Certificate of Assumed Name for The Detroit Institute of Arts Founders Society					
City	333	1/28/1998	Restated Articles of Incorporation for Detroit Institute of Arts Founders Society					
City	334	4/3/1945	1945 Articles of Incorporation Extending Corporate Term of the Detroit Museum of Art					
City	335	04/17/1885	1885 Articles of Incorporation of the Detroit Museum of Art					
City	336	3/23/1915	1915 Articles of Incorporation of the Detroit Museum of Art					
City	337	3/31/2013	05/31/2013 Certificate of Assumed Name for Detroit Institute of Arts					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	338	3/31/2013	05/31/2013 Certificate of Assumed Name for Detroit Institute of Arts, Inc.					
City	339	3/31/2013	05/31/2013 Certificate of Assumed Name for The Detroit Institute of Arts Founders Society					
City	340	10/11/2000	10/11/2000 Certificate of Amendment to the Articles of Incorporation (name of the corporation is The Detroit Institute of Arts)					
City	341	12/17/2013	12/17/2013 Letter from D. Woodham to K. Orr		Hearsay			
City	342	12/17/2013	Christie's report, "Fair Market Value for Financial Planning"	Hearsay	Hearsay			FRE 801
City	343	12/3/2013	12/03/2013 Letter from D. Woodham to K. Orr		Hearsay			
City	344	Undated	Undated Letter from D. Bing to Wayne County, Macomb County, and Oakland County Commissioners		Hearsay			
City	345	8/7/2012	Tri-County Millage Documents					
City	346	4/12/2013	04/12/2013 Letter from A. Schwartz to Attorney General Schuette	Hearsay	Hearsay	Hearsay; Legal Opinion		
City	347	4/13/2013	04/13/2013 New York Times article, "A Missionary's Quest to Remake Motor City"	Hearsay	Hearsay	Hearsay		FRE 801

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	348	7/27/1946	08/06/1948 Certificate of Amendment to the Articles of Incorporation [name of the corporation is Detroit Museum of Art Founders Society]					
City	349	1/23/1962	01/23/1962 Certificate of Amendment to the Articles of Incorporation (name of the corporation is Founders Society Detroit Institute of Arts)					
City	350	Undated	2012 Charter of the City of Detroit		Hearsay			Legal materials
City	351	5/21/2014	Resolutions of the Board of Directors of the DIA (May 21, 2014)		Hearsay			
City	352	06/20/2014 06/02/2014 06/19/2014 06/19/2014 06/20/2014 05/19/2014 05/19/2014 06/18/2014 05/28/2014 05/19/2014	Letters to Kevyn Orr from Ford Foundation, W.K. Kellogg Foundation, Knight Foundation, Community Foundation for Southeast Michigan, The Fred A. and Barbara M. Erb Family Foundation, Hudson-Webber Foundation, Charles Stewart Mott Foundation, and McGregor Fund (various dates in May and June, 2014)	Hearsay; Misleading - compilation of documents.	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	353	7/16/2014	DIA press release, "Detroit Institute of Arts announces $26.8 million in Pledges from Michigan Businesses for Grand Bargain - Museum nears $80 million mark of $100 million grand bargain commitment"	Hearsay	Hearsay			FRE 801
City	354	1/29/2014	DIA press release, "Detroit Institute of Arts to raise $100 Million towards Detroit's Revitalization"	Hearsay	Hearsay			FRE 801
City	355	7/17/2014	07/17/2014 Detroit Free Press article, "Detroit Historical Museum to announce $21.2M fund-raising success"	Hearsay	Hearsay; Relevance.	Hearsay		FRE 801
City	356	6/20/2014	Public Act 188 of 2014 (contributing $195 million to the Grand Bargain)					
City	357	7/7/1904	DMA 1904 Annual Report					
City	358	6/30/2014	DMA1914 Annual Report					
City	359	6/30/1916	DMA 1916 Annual Report					
City	360	6/30/1918	DMA 1918 Annual Report					
City	361	6/30/1919	DMA 1919 Annual Report					
City	362	00/00/1920	Art Commission 1920 Annual Report					
City	363	00/00/1949	DIA 1949-50 Annual Bulletin (No. 1)					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	364	00/00/1950	DIA 1949-50 Annual Bulletin (No. 3)					
City	365	00/00/1952	DIA 1952-53 Annual Bulletin (No. 2)					
City	366	00/00/1953	DIA 1953-54 Annual Bulletin (No. 1)					
City	367	00/00/1954	DIA 1954-55 Annual Bulletin (No. 2)					
City	368	00/00/1956	DIA 1956-57 Annual Bulletin (No. 2)					
City	369		1958-59 Annual Bulletin (No. 3)					
City	370	00/00/1959	DIA 1959-60 Annual Bulletin (No. 2)					
City	371	4/00/1920	DIA April 1920 Bulletin (No. 7)					
City	372	4/00/1921	DIA April 1921 Bulletin (No. 7)					
City	373	12/00/1941	DIA December 1941 Bulletin (No. 3)					
City	374	2/00/1921	DIA February 1921 Bulletin (No. 5)					
City	375	2/00/1932	DIA February 1932 Bulletin (No. 5)					
City	376	2/00/1937	DIA February 1937 Bulletin (No. 5)					
City	377	2/00/1942	DIA February 1942 Bulletin (No. 5)					
City	378	2/00/1943	DIA February 1943 Bulletin (No. 5)					
City	379	07/00/1904	DMA July 1904 Bulletin (No. 3)					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	380	5/00/1932	DIA May 1932 Bulletin (No. 8)					
City	381	11/00/1920	DIA November 1920 Bulletin (No. 2)					
City	382	10/00/1919	DMA October 1919 Bulletin (No. 1)					
City	383	10/00/1935	DIA October 1935 Bulletin (No. 1)					
City	384	7/00/1899	DMA 1899 Annual Report					
City	385	6/30/1917	DMA 1917 Annual Report					
City	386	6/30/1919	DMA 1919 Annual Report					
City	387	00/00/1953	DIA 1953-54 Annual Bulletin (No. 1)					
City	388	4/00/1907	DMA April 1907 Bulletin (No. 13)					
City	389	4/00/1920	DIA April 1920 Bulletin (No. 7)					
City	390	1/00/1905	DMA January 1905 Bulletin (No. 5)					
City	391	6/27/1918	1918 Charter of the City of Detroit					
City	392	1/17/1933	01/17/1933 Letter from Arts Commission to Mayor F. Murphy	Hearsay				
City	393	6/25/1975	06/25/1975 Letter from C. Young to F. Cummings	Hearsay				
City	394	5/22/1989	Journal of the City Council (05/22/1989 – 12/06/1989)	Hearsay				
City	395	6/18/2014	Association of Art Museum Directors Sanctions Delaware Art Museum	Hearsay	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	396	6/4/2013	Letter from Rub (AAMD CEO) to Snyder	Hearsay	Hearsay			
City	397	2/11/2014	American Alliance of Museums Statement on Deaccessioning of "Men of the Docks" by Maier Museum of Art at Randolph College	Hearsay	Hearsay			
City	398	6/18/2014	American Alliance of Museums Statement on the Deaccessioning by the Delaware Art Museum and the Action taken by the AAM Accreditation Commission	Hearsay	Hearsay			
City	399	7/21/2014	Amendment to Art Institute Service Agreement between the Macomb County Art Insitute Authority and Detroit Insitute of Arts, Inc.					
City	400	00/00/0000	Amendment to Art Institute Service Agreement between the Macomb County Art Insitute Authority and Detroit Insitute of Arts, Inc.					
City	401	00/00/0000	Amendment to Art Institute Service Agreement between the Macomb County Art Insitute Authority and Detroit Insitute of Arts, Inc.	Hearsay; Foundation				
City	402	8/6/2014	Resolutions of the Board of Directors of the DIA	Completenes s	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	403	5/23/2014	Preliminary Proposal for Appraising the Collection of the Detroit Institute of Art (Wiener Dep Ex. 2)		Hearsay			
City	404	1/1/2014	Uniform Standards of Appraisal Practice (Wiener Dep Ex. 4)					
City	405	1/1/2014	USPAP Frequently Asked Questions (Wiener Dep Ex. 5)					
City	406	3/26/2014	American Alliance of Museums Statement on Delaware Art Museum (Wiener Dep Ex. 6)	Hearsay; Cumulative	Hearsay			
City	407	1/1/2003	All About Appraising: The Definitive Appraisal Handbook (Wiener Dep Ex. 7)	Hearsay				
City	408	8/27/1970	Receipt and Commitment of Founders Society Detroit Institute of Arts Commission of the City of Detroit (Wiener Dep Ex. 8)					
City	409	00/00/0000	The Unique Aspects of Appraising Large Scale Art by Victor Wiener (Wiener Dep Ex. 9)	Hearsay	Hearsay			
City	410	3/00/1924	DIA March 1924 Bulletin (No. 6)					
City	411	11/00/1927	DIA November 1927 Bulletin (No. 2)					
City	412	2/00/1929	DIA February 1929 Bulletin (No. 5)					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	413	2/00/1924	DIA January and February 1924 Bulletin (No. 4 and 5)					
City	414	5/00/1924	DIA May 1924 Bulletin (No. 8)					
City	415	10/00/1924	DIA October 1927 Bulletin (No. 1)					
City	416	00/00/2000	American Alliance of Museums - Code of Ethics for Museums					
City	417	00/00/2004	Association of Art Museum Directors - Code of Ethics					
City	418	6/9/2010	Association of Art Museum Directors - Policy on Deaccessioning					
City	419	1/23/2013	Excerpts of City of Detroit Proposed Capital Agenda FY 2013-14 through FY 2017-18	Hearsay	Hearsay			
City	420	6/00/1993	Financial Accounting Standards Board Statement No. 116					
City	421	06/00/1999	Governmental Accounting Standards Board Statement No. 34 - Basic Financial Statements - and Management's Discussion and Analysis - for State and Local Governments					
City	422	10/8/2004	International Council of Museums - Code of Ethics for Museums					
City	423	8/8/2013	Christie's Appraisal Agreement					

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	424	12/9/2013	Christie's City of Detroit Appraisal: Analysis for Internal Use		Hearsay			
City	425	5/30/2013	E-mail from Beal to Whiting		Hearsay			
City	426	5/21/2013	Detroit Institute of Arts City of Detroit Purchase Objects by Primary Artist		Hearsay			
City	427	00/00/0000	AFRICA, OCEANIA & INDIGENOUS AMERICAS		Hearsay			
City	428	6/30/1939	1939 DIA Annual Report					
City	429	3/17/1958	1958 Amendment to Articles of Incorporation					
City	430	11/15/1974	1974 Amendment to Articles of Incorporation					
City	431	2/13/1986	1986 Restated Articles of Incorporation					
City	432	12/1/1988	1988 Amendment to Articles of Incorporation					
City	433	11/3/1995	1995 Amendment to Articles of Incorporation					
City	434	3/12/2014	AAMD Statement dated March 12, 2014	Hearsay				
City	435	8/6/2014	AAM "Characteristics of Excellence for U.S. Museums"	Hearsay				
City	436	5/24/2013	AAMD statement dated May 24, 2013	Hearsay; Relevance				
City	437	4/26/1932	Letter From the Mayor dated Apr. 26, 1932	Hearsay	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	438	9/5/2013	Artmarketmonitor.com, Sept. 5, 2013	Hearsay	Hearsay			FRE 801
City	439	8/15/2013	Oakland Press News, Aug. 15, 2013	Hearsay	Hearsay			FRE 801
City	440	00/00/0000	CV of Vanessa Fusco	Hearsay	Hearsay	Hearsay		FRE 401, 403, 801
City	441	00/00/0000	CV of Michael Plummer	Hearsay	Hearsay	Hearsay		FRE 401, 403, 801
City	442		Public Act No. 181 of 2014					Legal materials
City	443		Public Act No. 182 of 2014					Legal materials
City	444		Public Act No. 183 of 2014					Legal materials
City	445		Public Act No. 184 of 2014					Legal materials
City	446		Public Act No. 185 of 2014					Legal materials
City	447		Public Act No. 186 of 2014					Legal materials
City	448		Public Act No. 187 of 2014					Legal materials
City	449	1/1/1946	1946 U.S. Treasury, Bureau of Internal Revenue, Cumulative List of Organizations	Relevance				
City	450	00/00/0000	CV of John Satter	Hearsay	Hearsay			FRE 401, 403, 801
City	451		Public Act No. 245 of 1913					Legal materials
City	452	1/1/1885	Public Act No. 3 of 1885					Legal materials
City	453		Public Act No. 67 of 1919					Legal materials

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	454		Public Act No. 84 of 1921					Legal materials
City	455	4/15/2014	Settlement and Plan Support Agreement (Swap settlement agreement)					
City	456	7/8/2014	Expert Report of Suzanne Taranto	Hearsay	Hearsay	Hearsay		FRE 801
City	457	7/8/2014	Expert Report of Robert Cline	Hearsay	Hearsay	Hearsay		FRE 801
City	458	7/8/2014	Expert Report of Gaurav Malhotra	Hearsay	Hearsay	Hearsay		FRE 801
City	459	7/8/2014	Expert Report of Beth Niblock	Hearsay	Hearsay	Hearsay		FRE 801
City	460	7/8/2014	Expert Report of Michael Plummer	Hearsay	Hearsay	Hearsay		FRE 801
City	461	7/8/2014	Expert of Vanessa Fusco	Hearsay	Hearsay	Hearsay		FRE 801
City	462	7/8/2014	Expert of Kenneth Buckfire in Support of City of Detroit's Plan of Adjustment	Hearsay	Hearsay	Hearsay		FRE 801
City	463	7/8/2014	Expert Report of John Hill	Hearsay	Hearsay	Hearsay		FRE 801
City	464	7/8/2014	Expert Report of Charles M. Moore, CPA, CTP, CFF	Hearsay	Hearsay	Hearsay		FRE 801
City	465	7/8/2014	Expert Report of Alan Perry	Hearsay	Hearsay	Hearsay		FRE 801
City	466	7/8/2014	Amended Expert Report of John C. Satter	Hearsay Hearsay (COPs Holders)	Hearsay	Hearsay		FRE 801
City	467	7/8/2014	Expert Report of Caroline Sallee	Hearsay	Hearsay	Hearsay		FRE 801
City	468		Dity of Detroit: 2014 - 2023 Active Pension & Future Retiree OPEB Plan		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	469	5/1/2014	2014 - 34 Estimates: Income Stabilization Payments, Detroit Pension Recipients (Retirees - Income Stabilization Fund Data)		Hearsay			
City	470	4/14/2014	Letter from Bowen and Warren to Miller (Apr. 14, 2014)(Milliman Report - DGRS Estimated Liability Reduction in 2014 to Have 70% Funded Status in 2023 under a $54.4 million contribution scenario with a 6.75% investment return assumption) (no settlement)	Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	471	4/14/2014	Letter from Bowen and Warren to Miller (Apr. 14, 2014)(Milliman Report - DPFRS Estimate Liability Reduction in 2014 to Have 75% Funded Status in 2023 under a $38.6 million contribution scenario with a 6.75% investment return assumption) (no settlement)	Improper Redaction	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	472	4/25/2014	Letter from Bowen and Warren to Miller (Apr. 25, 2014)(DGRS Estimated Employer Contributions Required in 2014-2015 to 2022-2023 to Have 70% Funded Status in 2023 under and Annuity Savings Fund Recoupment (20% Cap) and a 4.5% Benefit reduction scenario with a 6.75% investment return assumption)	Hearsay; Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	473	4/23/2014	Letter from Bowen and Warren to Miller (Apr. 23, 2013)(DPFRS Estimated Funded Status and Unfunded Liability in 2023 under a 55% COLA reduction scenario with the 6.75% investment return assumption and four scenarios combining specified Employer Contributions from 2014-2015 to 2022-2023 and assumed market value of assets returns during 2013-2014)	Improper Redaction	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	474	4/25/2014	Letter from Bowen and Warren to Miller (Apr.25, 2014) (DGRS Estimated Employer Contributions Required in 2014-2015 to 2022-2023 to Have 70% Funded Status in 2023 under an Annuity Savings Fund recoupment (20% cap) and 4.5% benefit reduction scenario with a 6/75% investment return assumption)	Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	475	5/27/2014	City of Detroit: PFRS & GRS UAAL Amortization Data	Hearsay	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	476	6/30/2012	Gabriel Roeder Smith & Co. - GRS 74th Annual Actuarial Valuation (06.30.2012)					
City	477	5/27/2014	City of Detroit: Allocation of Restructured Legacy Expenditures to Non-General Fund (Other Reimbursements (POC & Pension) Data)	Hearsay	Hearsay			
City	478	1/3/2014	Draft letter from Taranto to Miller (Jan. 3, 2014) re June 30, 2012 Actuarial Valuation and Plan Design Study for the city of Detroit Retiree Health Care Plan _ Expected Plan Cash Flows	Hearsay; Relevance	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	479	5/19/2014	Total Employee Benefit Cost Breakdown Unaudited (FY13 healthcare by funding group)	Hearsay	Hearsay			
City	480	5/20/2013	Letter from Bowen and Warren to Miller (May 20, 2013) re DGRS Simple 10-Year Projection of Plan Freeze and No Future COLA	Hearsay; Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	481	5/21/2013	Letter from Bowen and Warren to Miller (May 21, 2013) re PFRS Simple 10-Year Projection of Plan Freeze and No Future COLA	Hearsay; Improper Redaction	Hearsay			
City	482	00/00/0000	Actuarial and average returns for both PFRS and GRS for the past 15 years	Hearsay	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	483	00/00/0000	Actual and average returns for both PFRS and GRS for the past 15 years	Hearsay	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	484	2/20/2014	2/20/2014 Letter from Taranto to Miller re June 30, 2012 Actuarial Valuation and Plan Design for the City of Detroit Retiree Health Care Plan -- Expected Plan Cash Flows	Hearsay; Improper Redaction	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	485	4/18/2013	4/18/2013 Letter from Bowen and Warren re Adjusted Funded Status under PA436 Section 12(1)(m) for DGRS and PFRS reflecting value of Pension Obligation Certificates	Hearsay	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	486	1/9/2014	1/9/2014 Letter from Bowen and Warren re DGRS -- Unfunded Liability for DWSD members in June 30, 2012 Actuarial Valuation Report prepared by Gabriel Roeder Smith & Co.	Hearsay; Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	487	2/28/2014	2/28/2014 Letter from Bowen and Warren to Miller re DWSD Estimated Employer Contributions from July 1, 2013 to June 30, 2023 to Have 70% Funded Status in 2023 under a 23% Additional Reduction scenarios with a 6.75% investment return assumption	Hearsay; Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	488	3/31/2014	3/31/2014 Letter from Bowen and Warren to Miller re DWSD Estimated Employer Contributions from July 1, 2013 to June 30, 2023 to Have 100% Funded Status in 2023 under a 16% Additional Reduction scenarios with a 6.75% investment return assumption	Hearsay; Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	489	3/28/2014	3/28/2014 Letter from Bowen and Warren to Miller re DWSD Estimated Employer Contributions from July 1, 2013 to June 30, 2023 to Have 70% Funded Status in 2023 under a 20% Additional Reduction scenarios with a 6.75% investment return assumption	Hearsay; Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	490	4/28/2014	4/28/2014 Letter from Bowen and Perry to Miller re Stochastic Modeling of Hypothetical Crediting Rate Formulas on ASF Balances	Hearsay; Improper Redaction	Hearsay			
City	491	4/17/2014	4/17/2014 Letter from Bowen and Warren to Miller re DGRS Actuarial Accrued Liability as of 6/30/2013	Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	492	5/7/2014	5/7/2014 Letter from Bowen and Warren to Miller re Estimated Employer Contributions under and Annuity Savings Fund recoupment (20% cap) and 4.5% benefit reduction scenario with a 6.75% investment return assumption	Hearsay; Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	493	5/5/2014	5/5/2014 Letter from Bowen and Warren re DGRS Individual Claim Allocation as of 6/30/2013 for active and inactive members - updated	Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	494	5/5/2014	5/5/2014 Letter from Bowen and Warren re DPFRS Individual Claim Allocation as of 6/30/2013 for active and inactive members - updated	Improper Redaction	Hearsay			
City	495	11/4/2013	11/4/2013 Letter from Bowen and Taranto to Miller re Recommended Investment Return Assumption as of June 30, 2013 for DGRS	Hearsay; Improper Redaction	Hearsay			
City	496	11/4/2013	11/4/2013 Letter from Bowen and Taranto to Miller re Recommended Investment Return Assumption as of June 30, 2013 for DPFRS	Hearsay; Improper Redaction	Hearsay			
City	497	3/6/2014	3/6/2014 Letter from Bowen and Warren to Miller re Proposed Approach to Requested Benefit Modeling	Hearsay	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	498	4/21/2014	4/21/2014 Letter from Taranto to Miller re Estimated Range for the Present Value of the ACA Premium Subsidy for Existing Retirees of the City of Detroit Retiree Health Care Plan as of January 1, 2014	Hearsay; Improper Redaction	Hearsay			
City	499	6/13/2014	DGRS 2014 PVAB Benefit Cut Model New ASF Recovery - net of admin		Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	500	6/13/2014	DGRS 2014 PVAB Benefit Cut Model New ASF Recovery - not net of admin		Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	501	6/13/2014	DPFRS 2014 PVAB Benefit Cut Model to 2053		Hearsay			
City	502	6/3/2014	6/3/2014 Letter from Bowen and Warren to Miller re DGRS Estimated Employer Contributins Required in 2014-2015 to 2022-2023 to Have 70% Funded Status in 2023 under an ASF recoupment (dual cap) and 4.5% benefit reduction scenario with a 6.75% investment return assumption	Hearsay; Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	503	6/10/2014	6/10/2014 Letter from Bowen and Perry to Miller re DGRS Est Employer Contributions Required in 2014-2015 to 2022-2023 to Have 70% Funded Status in 2023 (for the DB portion of the System) and estimated funded status in 2033 and 2043 reflecting City-Specified Employer Contributions beginning in 2023-2024 under an ASF recoupment (dual cap) and a 4.5% benefit reduction scenario with a 6.75% investment return assumption (net of both investment and administrative expenses)	Hearsay; Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	504	6/10/2014	6/10/2014 Letter from Bowen and Perry to Mill re DGRS Est Employer Contributions Required in 2014-2015 to 2022-2023 to Have 70% Funded Status in 2023 (for the DB portion of System) and estimated funded status in 2033 and 2043 reflecting City-Specified Employer Contributions beginning 2023-2024 under an ASF recoupment (dual cap) and 4.5% benefit reduction scenario with a 6.75% investment return assumption (net of investment expenses)	Hearsay; Improper Redaction	Hearsay (redactions under mediation)			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	505	6/13/2014	Letter from Bowen and Perry to Miller re DPFRS Est Funded Status in 2023, 2033 and 2043 and Unfunded Liab in 2023 under a 55% COLA reduction scenario with a 6.75% investment return assumption, $260.7 million in Employer Contributions from 2014-2015 to 2022-2023, City-Specified Employer Contributions beginning 2023-2024, and an 11.59% assumed market value of assets return during 2013-2014.	Hearsay; Improper Redaction	Hearsay (redactions under mediation)			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	506	7/22/2014	7/22/2014 Letter from Bowen and Warren to Miller re DGRS Est Funded Status and Unfunded Liab in 2023 under an Annuity Savings Fund recoupmen (dual cap) and 4.5% benefit reduction scenario with a 6.75% investment return assumption (net of investment expenses), City-specified Employer Contributions from 2014-2015 to 2022-2023, City-specified assumed market value of assets return during 2013-2014, and seven scenarios re assumed market value of assets returns from 7/1/2014 through 6/30/2023	Hearsay; Completenes s; Improper Redaction	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	507	5/1/2011	ASOP No. 4 (Actuarial Standard of Practice)					
City	508	9/1/2013	ASOP No. 27 (Actuarial Standard of Practice)					
City	509	5/27/2012	New York Times Article: "Public Pension Funds Faulted for Bets on Rosy Returns"	Hearsay Hearsay (COPs Holders)	Hearsay	Hearsay		FRE 801
City	510	5/10/2013	Survey of Professional Forecasters - 2Q2013	Hearsay	Hearsay	Hearsay		FRE 801
City	511	8/1/2013	Horizon Actuarial Services -- Survey of Capital Market Assumptions	Hearsay	Hearsay			FRE 801

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	512	11/25/2013	Survey of Professional Forecasters - 4Q2013	Hearsay	Hearsay	Hearsay		FRE 801
City	513	1/23/2014	NEPC 2014 Market Outlook - Assumptions and Actions for Clients	Hearsay	Hearsay	Hearsay		FRE 801
City	514	2/14/2014	Survey of Professional Forecasters - 1Q2014	Hearsay	Hearsay	Hearsay		FRE 801
City	515	2/26/2014	Wilshire Consulting: 2014 Report on State Retirement Systems: Funding Levels and Asset Allocation	Hearsay	Hearsay			FRE 801
City	516	8/3/2014	NYT Article: "New York City Pension System Is Strained by Costs and Politics"	Hearsay Hearsay (COPs Holders)	Hearsay	Hearsay		FRE 801
City	517	7/30/2011	City of Detroit Retiree Health Care Plan Actuarial Valuation Report as of June 30, 2011	Hearsay				
City	518	7/29/2013	Replication of the Gabriel Roeder Smith & Company June 30, 2011 Actuarial Valuation Report for the City of Detroit Retiree Health Care Plan.	Hearsay	Hearsay			
City	519	8/11/2014	Ten-Year Plan of Adjustment Sources and Uses for Reinvestment Initiatives		Hearsay			
City	520	N/A	N/A		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	521	7/6/2012	7/6/2012 Letter from Bowen and Taranto to Brown re City of Detroit -- Initial Assessment of Current Pension and Postretirement Health Situation		Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	522	7/18/2012	7/18/2012 Letter from Bowen and Taranto to Andrews re City of Detroit -- Phase 2 Assessment of Current Pension and Health Plan Situation	Hearsay	Hearsay			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
City	523	7/30/2013	7/30/2013 Letter from Taranto re June 30, 2012 Actuarial Valuation and Plan Design Study for the City of Detroit Retiree Health Care Plan	Hearsay; Improper Redaction	Hearsay			
City	524	10/25/2013	10/25/2013 Letter from Taranto to Miller re June 30, 2012 Actuarial Valuation and Plan Design Study for the City of Detroit Retiree Health Care Plan	Hearsay; Improper Redaction	Hearsay			
City	525	10/30/2013	10/30/2013 Letter from Taranto to Miller re June 30, 2012 Actuarial Valuation and Plan Design Study for the City of Detroit Retiree Health Care Plan	Hearsay; Improper Redaction	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	526	11/1/2013	11/1/2013 Letter from Taranto to Miller re June 30, 2012 Actuarial Valuation and Plan Design Study for the City of Detroit Retiree Health Care Plan	Hearsay; Improper Redaction	Hearsay			
City	527	11/26/2013	11/26/2013 Letter from Taranto to Miller re June 30, 2012 Actuarial Valuation and Plan Design Study for the City of Detroit Retiree Health Care Plan APBO Results	Hearsay; Improper Redaction	Hearsay			
City	528	1/4/2014	1/4/2014 Draft Letter from Taranto to Miller re June 30, 2012 Actuarial Valuation and Plan Design Study for the City of Detroit Retiree Health Care Plan -- Expected Cash Flows	Hearsay; Improper Redaction	Hearsay			
City	529	1/21/2014	1/23/2014 Letter from Taranto to Miller re June 30, 2012 Actuarial Valuation and Plan Design Study for the City of Detroit Retiree Health Care Plan -- Department of Water and Sewer Projection	Hearsay; Improper Redaction	Hearsay			
City	530	1/27/2014	1/27/2014 Letter from Taranto to Miller re June 30, 2012 Actuarial Valuation and Plan Design Study for the City of Detroit Retiree Health Care Plan -- Expected Cash Flows	Hearsay; Improper Redaction	Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	531	4/10/2014	4/10/2014 Letter from Taranto to Miller re June 30, 2012 Actuarial Valuation including Medical Cost for Retirees with Dental and Vision Only Coverage for the City for the City of Detroit Retiree Health Care Plan	Hearsay; Improper Redaction	Hearsay			
City	532	6/30/2013	Citigroup Pension Liability Index and Pension Discount Curve	Hearsay	Hearsay			FRE 801
City	533	1/15/2013	Pension Benefit Guaranty Corp January 15, 2013 Interest Rate Update		Hearsay			FRE 801
City	534	6/30/2013	Pension Benefit Guaranty Corp June 30, 2013 Interest Rate Update		Hearsay			FRE 801
City	535	12/31/2013	Pension Benefit Guaranty Corp December 31, 2013 Interest Rate Update		Hearsay			FRE 801
City	536	7/15/2014	Pension Benefit Guaranty Corp July 15, 2014 Interest Rate Update		Hearsay			FRE 801
City	537	00/00/0000	PBGC Procedure for Setting Interest Factors Used to Value Liabilities For PBGC Financial Statements		Hearsay			FRE 801
City	538	00/00/0000	City of Detroit Restructuring Projects - Project Listing		Hearsay			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	539	00/00/0000	Rule 1006 Summary - DIA Historical Document Excerpts – Statements Relating to Donor Expectations	Hearsay; Misleading; Improper Rule 1006 Summary	Hearsay; Misleading			
City	540	00/00/0000	Rule 1006 Summary - DIA Historical Document Excerpts – Statements Relating to Charitable or Public Trust Arguments	Hearsay; Misleading; Improper Rule 1006 Summary	Hearsay; Misleading			
City	541		Rule 1006 Summary - Expected Discount Rate Model 20130630		Hearsay; Misleading			
City	542		Public Finance Credit Application		Hearsay			
City	543	1/00/1906	January 1906 DIA Bulletin		Hearsay			
City	544	00/00/0000	Ten-Year Financial Projections Net Utility Users' tax revenue - 40-Year forecast	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014
City	545	00/00/0000	Population Change Scenarios DEM	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014
City	546	00/00/0000	Detroit Share of Total Michigan Employment, 1990 - 2012 DEM	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014
City	547	00/00/0000	Growth Rates of Detroit vs. Michigan Employment, 2001 - 2012 DEM	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014
City	548	00/00/0000	Income Tax Bases A, B, and C Chart DEM	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014
City	549	N/A	N/A					
City	550	4/29/2014	Letter from Brian Forde to Mayor Duggan		Hearsay; Relevance			

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	551	4/29/2014	Detroit Tech Team Report		Hearsay	Macomb objects on the ground that the document is hearsay.		
City	552	7/3/2014	IT Projects Summary		Hearsay			
City	553	5/19/2014	Report from Beth Niblock to Mayor Duggan		Hearsay	Macomb objects on the ground that the document is hearsay.		
City	554	00/00/0000	List of Materials Considered by Beth Niblock in Expert Report		Hearsay	Macomb objects on the ground that the document is hearsay.		
City	555	00/00/0001	Beth Niblock CV		Hearsay	Macomb objects on the ground that the document is hearsay.		
City	556	8/17/2014	10-Year Plan of Adjustment (working model) - Income Tax Model (Baseline Scenario)	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014
City	557	8/17/2014	10-Year Plan of Adjustment (working model) - Income Tax Model (Restructuring Scenario)	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014

Party	Master Exhibit Number	Date	Exhibit Description	FGIC's and COPs Holders' Objections	Syncora's Objections	Macomb County's Objections	Oakland County's Objections	DWSD Parties' Objections
City	558	8/17/2014	10-Year Plan of Adjustment (working model) - Wagering Tax Model	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014
City	559	8/17/2014	40-Year Plan of Adjustment (working model) - Revenue Driver Model	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014	Admitted 8/18/2014
City	587	5/25/2010	Order on Certain Direct Lenders' Motion for the Imposition of Sanctions, In re Asset Resolution, LLC, et al., Case No. BK-S-09-32824-RCJ	Legal materials; FRE 801 for any hearsay statements contained within the document.		Relevance		Legal materials

ATTACHMENT B

THE COMMITTEE'S EXHIBIT LIST WITH OBJECTORS' OBJECTIONS

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10000	All collective bargaining agreements between the City of Detroit and its bargaining units from 1956 to present, including but not limited to those individually listed below.	Macomb objects on grounds that exhibits are not supplied and the description is vague		
10001	1971-1974 Collective Bargaining Agreement, Michigan State Council 77.			
10002	Agreement Between the City of Detroit and the Detroit Fire Fighters' Association Local 344 I.A.F.F.			
10003	6-26-73 to 6-25-76 Collective Bargaining Agreement, Detroit Police Officers Association			
10004	1974-1977 Collective Bargaining Agreement, Michigan State Council 77			
10005	11-20-74 to 6-30-77 Collective Bargaining Agreement, Detroit Police Lieutenants' and Sergeants' Association			
10006	1974-77 Agreement Between the City of Detroit and the Detroit			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	Fire Fighters' Association Local 344 I.A.F.F.			
10007	1977-1980 Collective Bargaining Agreement (Master), Michigan State Council 25 (Non-Supervisory Bargaining Unit).			
10008	7-1-80 to 6-30-83 Collective Bargaining Agreement, Detroit Police Officers Association			
10009	8-20-79 to 6-30-80 Collective Bargaining Agreement, Detroit Police Lieutenants' and Sergeants' Association			
10010	7-1-77 to 6-30-80 Collective Bargaining Agreement, I.A.F.F. Local 344.			
10011	1980-1983 Collective Bargaining Agreement (Master), Michigan State Council 25 (Non-Supervisory Bargaining Unit).			
10012	1980-1983 Collective Bargaining Agreement, Amalgamated Transit Union, Division 26.			
10013	1980-1983 Collective Bargaining Agreement, Detroit Police Lieutenants' and Sergeants' Association			
10014	7-1-80 to 6-30-83 Collective Bargaining Agreement, I.A.F.F. Local 344.			
10015	1983-1986 Collective Bargaining Agreement			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	(Master), Michigan State Council 25 (Non-Supervisory Bargaining Unit).			
10016	1983-1986 Collective Bargaining Agreement, Amalgamated Transit Union, Division 26.			
10017	1986-1989 Collective Bargaining Agreement (Master), Michigan State Council 25 (Non-Supervisory Bargaining Unit).			
10018	1986-1989 Collective Bargaining Agreement, Detroit Police Officers Association			
10019	11-6-87 to 6-30-89 Collective Bargaining Agreement, Detroit Police Lieutenants' and Sergeants' Association			
10020	1986-1989 Collective Bargaining Agreement, Amalgamated Transit Union, Division 26.			
10021	1986-1989 Collective Bargaining Agreement, Teamsters State, County and Municipal Workers Local #214.			
10022	7-1-86 to 6-30-89 Collective Bargaining Agreement, I.A.F.F. Local 344.			
10023	1989-1992 Collective Bargaining Agreement (Master), Michigan State Council 25 (Non-Supervisory Bargaining Unit).			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10024	7-1-92 to 6-30-98 Collective Bargaining Agreement, I.A.F.F. Local 344.			
10025	1995-1998 Collective Bargaining Agreement (Master), Michigan State Council 25 (Non-Supervisory Bargaining Unit).			
10026	1998-2001 Collective Bargaining Agreement (Master), Michigan State Council 25, Local 542			
10027	1998-2001 Collective Bargaining Agreement (Master), Michigan State Council 25 (Non-Supervisory Bargaining Unit).			
10028	1998-2001 Collective Bargaining Agreement (Master), Michigan State Council 25, Local 2394.			
10029	1998-2000 Collective Bargaining Agreement, Detroit Police Lieutenants' and Sergeants' Association			
10030	2001-2005 Collective Bargaining Agreement (Master), Michigan State Council 25 (Non-Supervisory Bargaining Unit)			
10031	1998-2001 Collective Bargaining Agreement, Detroit Police Officers Association			
10032	Master Agreement Between the City of Detroit and the Detroit Police Lieutenants and			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	Sergeants Association 2001-2006			
10033	7-1-96 to 6-30-04 Collective Bargaining Agreement, Detroit Police Command Officers Association, Unit I			
10034	7-1-96 to 6-30-04 Collective Bargaining Agreement, Detroit Police Command Officers Association, Unit II			
10035	7-1-98 to 6-30-01 Collective Bargaining Agreement, I.A.F.F. Local 344.			
10036	1998-2001 Collective Bargaining Agreement, Michigan State Council 25, Emergency Medical Service Officers Association			
10037	2001-2005 Collective Bargaining Agreement (Master), Michigan State Council 25 (Non-Supervisory Bargaining Unit).			
10038	2001-2005 Collective Bargaining Agreement (Master), Michigan State Council 25, Local 1206.			
10039	2001-2005 Collective Bargaining Agreement, D.O.T. Foreman's Association, Supervisory			
10040	2001-2005 Collective Bargaining Agreement (Master), Michigan State Council 25, Local 2394 (Supervisory).			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10041	2001-2005 Collective Bargaining Agreement (Master), Michigan State Council 25, DPW Paving Forepersons.			
10042	2005-2008 Collective Bargaining Agreement, International Union of Operating Engineers, Local 547			
10043	2005-2008 Collective Bargaining Agreement, Amalgamated Transit Union, Division 26.			
10044	2005-2008 Collective Bargaining Agreement, Detroit Building and Construction Trades Council.			
10045	2008-2012 Collective Bargaining Agreement (Master), Michigan State Council 25 (Non-Supervisory Bargaining Unit)			
10046	2005-2008 Collective Bargaining Agreement, D.O.T. Foreman's Association, Non-Supervisory.			
10047	2005-2009 Collective Bargaining Agreement (Master) Local 1023, Michigan State Council 25 (Emergency Services Operators Chapter)			
10048	2009-2013 Collective Bargaining Agreement, I.A.F.F. Local 344.			
10049	2009-2013 Collective Bargaining Agreement, Detroit Police Lieutenants' and			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	Sergeants' Association			
10050	2009-2012 Collective Bargaining Agreement, Detroit Police Officers Association			
10051	2008-2012 Collective Bargaining Agreement, Teamsters State, County and Municipal Workers Local #214.			
10052	2001-2008 Collective Bargaining Agreement, I.A.F.F. Local 344.			
10053	2012-2013 Collective Bargaining Agreement, Teamsters State, County and Municipal Workers Local #214.			
10054	2012-2013 Collective Bargaining Agreement, Local 2200, Wastewater Treatment Plant Supervisors.			
10055	2012-2022 Collective Bargaining Agreement, I.U.O.E. Local 324, Operating Engineers Detroit Principal Clerks and Park Management Units.			
10056	2012-2020 Collective Bargaining Agreement, Association of Professional Construction Inspectors.			
10057	H. Atkinson Expert Report, Detailed List of Actuarial Assumptions, § 23.	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10058	Consent Judgment and Order of Dismissal, Weiler v. City of Detroit, case no. 06-619737-CK, Wayne County Circuit Court, Aug. 26, 2009		Hearsay	
10059	2012-2013 City of Detroit Retiree Health Care Plan Options		Hearsay	
10060	2012-2013 City of Detroit Retiree Modified Option III Plan		Hearsay	
10061	2012-2013 City of Detroit Retiree Medical Plan Design III		Hearsay	
10062	2012-2013 City of Detroit Retiree Health Care Plan Options - Police and Fire		Hearsay	
10063	Retiree Health Plan for March 1, 2014 through December 31, 2014 City of Detroit Retiree Health Care Plan		Hearsay	
10064	Monthly Contributions and City Payments for Medicare Advantage Plans for Police and Fire Uniformed Retirees		Hearsay	
10065	Monthly Contributions and City Payments for the HMO plans for the General City Retirees		Hearsay	
10066	City of Detroit - Retiree Legacy Cost Restructuring - September 11, 2013		Hearsay	FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
10067	Milliman report, dated November 1, 2013, June 30, 2013 Actuarial Valuation		Hearsay	

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10068	GRS VEBA Trust Agreement (form)		Hearsay	
10069	PFRS VEBA Trust Agreement (form)		Hearsay	
10072	Proof of Claim #1913 (related to GRS Pension Benefits)		Hearsay	
10073	Proof of Claim #1737 (related to OPEB)		Hearsay	
10074	Amended Proof of Claim #3637 (related to PFRS Pension Benefits)		Hearsay	
10075	Gabriel Roeder Smith & Company - City of Detroit Retiree Health Care Plan – Actuarial Valuation Report as of June 30, 2011			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
10076	Milliman data file of City of Detroit retirees as of August 2013 (CoD_RetireeHedCounts _deidentified.xlsx)		Hearsay	
10077	Exhibit 1.A.186 to the Fourth Amended Plan			FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
10078	Bowen Exhibit 41: June 9, 2014 Milliman Letter (POA00258696 - POA00258699; MCOPW021051 - MCOPW021054)		Hearsay	
10079	Bowen Exhibit 42: GRS 2012 Actuarial Report		Hearsay	
10080	Daddow Exhibit 3: Oct. 25, 2013 R. Daddow email with comments regarding regionalization of DWSD (OAK0006134 - OAK0006142)		Hearsay	FRE 401, 403, 801

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10081	Daddow Exhibit 4: April 7, 2014 email with DWSD Proposal, Response to Due Diligence, and Letter to K. Orr (OAK0006134 - OAK0006142)		Hearsay	FRE 401, 403, 801
10082	Kucel Exhibit 2: FY 2015 Sewage Disposal System Capital Improvement Program (POA00336692 - POA00336730)		Hearsay	
10083	McCormick Exhibit 11: Sewer Bond Ordinance 18-01 (AGM0006192 - AMG0006225)		Hearsay	Inaccurate description of exhibit; Legal materials
10084	McCormick Exhibit 13: Exhibit M to Fourth Amended Disclosure Statement		Hearsay	
10085	McCormick Exhibit 5: Fourth Amended Plan of Adjustment		Hearsay	
10086	Nadol Exhibit 2: Exhibit M to Fourth Amended Disclosure Statement		Hearsay	
10087	Porter Exhibit 5: FY 2015 Water Supply System Capital Improvement Program (POA00062877 - POA00062918)		Hearsay	
10088	Porter Exhibit 11: Exhibit L to Fourth Amended Disclosure Statement		Hearsay	
10089	Sewer Bond Indenture (POA00000089 - POA00000124)			
10090	Water Bond Indenture (POA00014120 - POA00014155)			
10091	Water Bond Ordinance 30-02 (POA00003870 -			Legal materials

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	POA00003907)			
10092	MCL 141.120			Legal materials
10093	MCL 141.133			Legal materials
10094	MCL 141.2303			Legal materials
10095	2012 Home Rule Charter of the City of Detroit, Article 11			Legal materials
10096	2012 Home Rule Charter of the City of Detroit, Article 7, Chapter 12			Legal materials
10097	1997 Home Rule Charter of the City of Detroit, Article 11			Legal materials
10098	Detroit City Code, Chapter 13, Article VIII			Legal materials
10099	Detroit City Code, Chapter 13, Article X			Legal materials
10100	K. Nicholl Expert Report Dated July 22, 2014, Table 23	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10101	K. Nicholl Expert Report Dated July 22, 2014, Table 31	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10102	K. Nicholl Expert Report Dated July 22, 2014, Chart 45	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10103	K. Nicholl Expert Report Dated July 22, 2014,	Macomb objects on	Hearsay	FRE 801

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	Chart 46	the ground that the document is hearsay.		
10104	K. Nicholl Expert Report Dated July 22, 2014, Table 49	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10105	K. Nicholl Expert Report Dated July 22, 2014, Chart 55	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10106	K. Nicholl Expert Report Dated July 22, 2014, Chart 57	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10107	K. Nicholl Expert Report Dated July 22, 2014, Chart 58	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10108	K. Nicholl Expert Report Dated July 22, 2014, Chart 62A	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10109	K. Nicholl Expert Report Dated July 22, 2014, Chart 62B	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10110	K. Nicholl Expert Report Dated July 22, 2014, Chart 63A	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10111	K. Nicholl Expert Report Dated July 22, 2014, Chart 63B	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10112	K. Nicholl Expert Report Dated July 22, 2014, Chart 65A	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10113	K. Nicholl Expert Report Dated July 22, 2014, Chart 65B	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10114	K. Nicholl Expert Report Dated July 22, 2014, Table 78	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10115	K. Nicholl Expert Report Dated July 22, 2014, Demonstrative Footnote 12	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10116	K. Nicholl Expert Report Dated July 22, 2014, Table 97	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10117	K. Nicholl Expert Report Dated July 22, 2014, Table 98	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10118	Actuarial Standard of Practice No. 4 (both ASB docs. 125 and 173)		Hearsay	
10119	Actuarial Standard of Practice No. 27 (both ASB docs. 145 and 172)		Hearsay	
10120	Actuarial Standard of Practice No. 35		Hearsay	
10121	Governmental Accounting Standards Board No. 67, "Financial Reporting for Pension Plans" (June 2012)			
10122	Detroit City Code Chapter 47, Article I (2001)			Legal materials
10123	Detroit City Code Chapter 47, Article II (2001)			Legal materials
10124	Detroit City Code Chapter 47, Article IV (2001)			Legal materials
10125	Detroit City Ordinance No. 39-05			Legal materials

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10126	Detroit City Charter, Title 9, Ch. VII, et seq., as amended effective January 1, 1969, available at http://www.pfrsdetroit.org/images/pdf/charter.pdf			Legal materials
10127	Detroit City Charter, Article 11 (effective 2013)		Hearsay	Legal materials
10128	Detroit City Charter, Article 13, Section 13-107 (effective 2013)		Hearsay	Legal materials
10131	EXHIBIT NO. REVISED: NOW EXHIBITS 10204 TO 10226			
10132	July 8, 2014 email from Juan Santambrogio of Ernst & Young to Daun Chung of Lazard Freres & Co and Gaurav Malhotra of Ernst & Young.	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10133	PFRS 67th Annual Actuarial Valuation dated June 30, 2008			
10134	PFRS 68th Annual Actuarial Valuation dated June 30, 2009			
10135	PFRS 69th Annual Actuarial Valuation dated June 30, 2010			
10136	PFRS 70th Annual Actuarial Valuation dated June 30, 2011			
10137	PFRS 71st Annual Actuarial Valuation dated June 30, 2012			
10138	PFRS 72nd Annual Actuarial Valuation dated June 30, 2013			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10139	GRS 70th Annual Actuarial Valuation dated June 30, 2008			
10140	GRS 71st Annual Actuarial Valuation dated June 30, 2009			
10141	GRS 72nd Annual Actuarial Valuation dated June 30, 2010			
10142	GRS 73rd Annual Actuarial Valuation dated June 30, 2011			
10143	GRS 74th Annual Actuarial Valuation dated June 30, 2012			
10144	GRS 75th Annual Actuarial Valuation dated June 30, 2013			
10145	PFRS audited financial statements for the period ended June 30, 2012			
10146	PFRS audited financial statements for the period ended Jun 30, 2013			
10147	Rosen Ex. 4 - Police and Fire Retirement System for the City of Detroit, Financial Report with Supplemental Information, June 30, 2005.			
10148	GRS audited financial statements for the period ended June 30, 2012			
10149	GRS audited financial statements for the period ended Jun 30, 2013			
10150	Milliman March 11, 2014 Addendum to March 6, 2014 Memorandum re: Proposed Approach to Requested Benefit Modeling		Hearsay	FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10151	Guidelines for Making the DROP Decision		Hearsay	
10152	Official Committee of Retirees' Letter in Support of the City of Detroit's Plan of Adjustment		Hearsay	FRE 401, 403, 801
10153	March 26, 2014 Letter from the Retirees' Committee, "What Deal, Mr. Finley."		Hearsay	FRE 401, 403, 801
10154	Actuarial & Statistical Section of the GRS Annual Report for the period ending June 30, 2003			
10155	Letter from Milliman to Evan Miller dated April 16, 2014 Re: DGRS Estimated Employer Contributions Required in 2014-2015 to 2022-2023 to Have 70% Funded Status in 2023 under an Annuity Savings Fund recoupment (20% cap) and 4.5% benefit reduction scenario with a 6.75% investment return assumption		Hearsay	FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
10156	Letter from Milliman to Evan Miller dated April 10, 2014 Re: DGRS Estimated Liability as of June 30, 2014 assuming that benefits are frozen as of June 30, 2014 and that future COLAs to current and future retirees are ceased as of June 30, 2014		Hearsay	FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
10157	Letter from Milliman to Evan Miller dated May 5,		Hearsay	

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	2014 Re: DPFRS Individual Claim Allocation as of June 30, 2013 for active and inactive members - updated			
10158	Letter from Milliman to Evan Miller dated April 17, 2014 Re: DPFRS Actuarial Accrued Liability as of June 30, 2013		Hearsay	
10159	Letter from Milliman to Evan Miller dated May 5, 2014 Re: DGRS Individual Claim Allocation as of June 30, 2013 for active and inactive members - updated		Hearsay	FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
10160	Letter from Milliman to Evan Miller dated April 17, 2014 Re: DGRS Actuarial Accrued Liability as of June 30, 2013		Hearsay	FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
10161	Letter from Milliman to Evan Miller dated April 7, 2014 Re: DPFRS Estimated liability as of June 30, 2014 assuming that benefits are frozen as of June 30, 2014 and that future COLAs to current and future retirees are ceased as of June 30, 2014		Hearsay	
10162	Christie, Mortgage Rates Drop to Near 4%, CNN Money, (Jul. 3, 2013) - Available at http://money.cnn.com/20	Macomb objects on the ground that the document is	Hearsay	FRE 401, 403, 801

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	14/07/03/real_estate/mortgage-rates/index.html?hpt=hp_t2.	hearsay and lacks foundation.		
10163	Freddie Mac, Primary Mortgage Market Survey - Available at http://www.freddiemac.com/pmms/.		Hearsay	FRE 401, 403, 801
10164	NASRA Issue Brief: Public Pension Plan Investment Return Assumption, NAT'L ASSOC. OF STATE RETIREMENT ADMINISTRATORS, Apr. 2014 - Available at http://www.nasra.org/files/Issue%20Briefs/NASRAInvReturnAssumptBrief.pdf.		Hearsay	
10165	The Pennsylvania Municipal Retirement System Comprehensive Annual Financial Report For the Fiscal Year Ended December 31, 2012 - Available at http://gfoa.net/cafr/COA2012/PennsylvaniaMunicipalRetirementSystemPA.pdf.		Relevance	
10166	Consumer Price Index for All Urban Consumers – Available at http://www.bls.gov/cpi/.			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10167	2013 Annual Report of the Board of Trustees of the Federal Old-Age and Survivors Insurance and Disability Insurance Trust Funds (2013 OASDI Trustees Report - Available at http://www.ssa.gov/oact/tr/2013/tr2013.pdf.		Relevance	FRE 401, 403, 801
10168	Board of Governors of the Federal Reserve System, Selected Interest Rates (Daily) - H.15 - Available at http://www.federalreserve.gov/releases/h15/update/.			FRE 401, 403
10169	Daily Treasury Yield Curve Rates, United States Department of Treasury (2014) - Available at http://www.treasury.gov/resource-center/data-chart-center/interest-rates/Pages/TextView.aspx?data=yieldYear&year=2014.			FRE 401, 403
10170	Data provided by Conway MacKenzie and Milliman relating to AFS recoupments		Hearsay	FRE 401, 403, 701, 702, 801, FRCP 26(a)(2)
10171	1989-2013 GRS and PFRS historical returns (POA00602884).		Hearsay	

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10172	Excerpt from 1995-1998 Master Agreement between AFSCME and the City of Detroit			
10173	Excerpt from 2008-2012 Master Agreement between AFSCME and the City of Detroit			
10174	Excerpt from 2009-2012 Master Agreement between the DPOA and City of Detroit			
10175	2001-2008 Master Agreement between the Detroit Fire Fighters Association and the City of Detroit (Section 14.j)			
10176	MCL 117.4i			Legal materials
10177	MCL 117.4j			Legal materials
10178	MCL 38.1132			Legal materials
10179	MCL 38.1133			Legal materials
10180	MCL 38.1140m			Legal materials
10181	Mich. Const. art. 7, § 22			Legal materials
10182	Decision and Recommended Order of Administrative Law Judge on Summary Disposition, City of Detroit v. AFSCME Council 25, 2000 Mich. Empl. Rel. Comm'n,			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	Docket No 12-000777			
10183	Emergency Manager Order No. 8, Initial 60 Day Report (July 2011-March 2013) - Available at http://www.freep.com/assets/freep/pdf/C4212427926.PDF.		Hearsay	
10184	Center for Retirement Research, Table Showing Actuarial Assumptions by Plan for 126 selected public pension plans, available at http://nianticsystems.com/pls/apex/f?p=1988:17:13691619169154:fsp_sort_1::RP&fsp_region_id=831306267286505451.		Hearsay	
10185	Excel file provided by the Retirement Systems that contains census data as of Feb. 28, 2014		Hearsay	FRE 401, 403, 801
10185	Excel file provided by retirement systems that contains census data as of Feb. 28, 2014	Macomb objects on the ground that the document is hearsay and lacks foundation.	Hearsay	FRE 401, 403, 801
10186	Curriculum Vitae of Kim Nicholl		Hearsay	
10187	Number of City of Detroit Retirees by Home Address	Macomb objects on the ground that the document is	Hearsay; Relevance	

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
		hearsay and lacks foundation.		
10188	Table of Classes 10-12 Ballot Data - Total Members and Detroit Residents.		Hearsay; Relevance	
10189	New York City Employees' Retirement System, 2013 Comprehensive Annual Financial Report for the Fiscal Years Ended June 30, 2013, and June 30, 2012 – Available at https://www.nycers.org/(S(j1ekiz45a4rsy0arkibjs545))/Pdf/cafr/2013/CAFR2013.pdf.		Hearsay; Relevance	
10190	Exhibit I.A.236, Feb. 14, 2014 Health Care Settlement Agreement	Macomb objects on the ground that the document is hearsay.		
10191	S. Wohl Expert Report, Differences in Subsidies Table, p.13	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10192	S. Wohl Expert Report, Benefit Value Reduction Chart, p.18	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10193	S. Wohl Expert Report, Federal Poverty Level Table, p.19	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10194	S. Wohl Expert Report, Premium as a Percent of Income as Compared to the Federal Poverty Level Table, p.20	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10195	S. Wohl Expert Report, Expected Premium Tax Credits by AGI ($175 Stipend) Table, p.21	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10196	S. Wohl Expert Report, Expected Premium Tax Credits by AGI (Duty Disability Stipend) Table, p.22	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801
10197	H. Atkinson Expert Report, Present Value as of June 30, 2013 Table, p.4	Macomb objects on the ground that the document is hearsay.	Hearsay	FRE 801

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10198	H. Atkinson Expert Report, Range of Reductions Table, p.4		Hearsay	FRE 801
10200	City of Detroit and DPOA - MERC Case No. D12 D-0354 - Panel's Findings, Opinion and Orders		Hearsay	
10201	DFFA Temporary Agreement			
10202	1992-1995 MA L312 Council 25			
10203	2001-2005 MA L1023 Emergency Services Operators Chapter			
10204	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Agency_Table		Hearsay	FRE 801
10205	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Deduction_Amounts		Hearsay	FRE 801
10206	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Deduction_Amounts_Descriptions_HRMS		Hearsay	FRE 801

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10207	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Deduction_Descriptions		Hearsay	FRE 801
10208	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Employee_Deudctions		Hearsay	FRE 801
10209	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Employee_Deductions_HRMS		Hearsay	FRE 801
10210	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Employee_Master		Hearsay	FRE 801
10211	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Employee_Master_HRMS		Hearsay	FRE 801
10212	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Eye_Care_Table		Hearsay	FRE 801
10213	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Eye_Care_Table_HRMS draft		Hearsay	FRE 801
10214	Data from the Retirement Systems' Access database providing data as of June 30, 2013: GC_Benefits		Hearsay	FRE 801

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10215	Data from the Retirement Systems' Access database providing data as of June 30, 2013: GCallAdjustments		Hearsay	FRE 801
10216	Data from the Retirement Systems' Access database providing data as of June 30, 2013: GCannuityRefunds		Hearsay	FRE 801
10217	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Job_Class_Rate		Hearsay	FRE 801
10218	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Job_Class_Rate_HRMS		Hearsay	FRE 801
10219	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Job_Class_Title		Hearsay	FRE 801
10220	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Job_Class_Titles_HRMS		Hearsay	FRE 801
10221	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Life_Insurance_Amounts		Hearsay	FRE 801
10222	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Longevity		Hearsay	FRE 801
10223	Data from the Retirement Systems' Access database providing data		Hearsay	FRE 801

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	as of June 30, 2013: PF_Benefits			
10224	Data from the Retirement Systems' Access database providing data as of June 30, 2013: PFallAdjustments		Hearsay	FRE 801
10225	Data from the Retirement Systems' Access database providing data as of June 30, 2013: PFannuityRefunds		Hearsay	FRE 801
10226	Data from the Retirement Systems' Access database providing data as of June 30, 2013: Retired_Life		Hearsay	FRE 801
10256	Agreement between the City of Detroit and the Detroit Police Officers Association 1986-1989			
10257	Contract 1989-1992 Detroit Police Officers Association - City of Detroit - Collective Bargaining Agreement for 1989-92			
10260	Master Agreement between the City of Detroit and the Detroit Police Officers Association 2004-2009			
10261	Master Agreement between the City of Detroit and the Teamsters State, County and Municipal Workers Local 214, effective 7/1/95-6/30/98			
10262	Master Agreement between the City of Detroit and the			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	Teamsters State, County and Municipal Workers Local 214, effective 1989-92			
10268	Master Agreement between the City of Detroit and the Detroit Fire Fighters Association, effective 7/1/98 - 6/30/01			
10269	Master Agreement between the City of Detroit and the Detroit Police Lieutenants' and Sergeants' Association, effective 11/20/7 - 6/30/77			
10272	Master Agreement between the City of Detroit and the Detroit Police Lieutenants' and Sergeants' Association, 89-92			
10275	Master Agreement between the City of Detroit and the Detroit Police Lieutenants' and Sergeants' Association, 92-98			
10286	Master Agreement between the City of Detroit and the Association of Professional Construction Inspectors, 05-08			
10289	Master Agreement between the City of Detroit and the Building Trades Foremen 05-08			
10290	Master Agreement between the City of Detroit and the Detroit Income Tax Investigators			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	Association, 05-08			
10291	Master Agreement between the City of Detroit and Department of Transportation Foremen's Association, (Non-Supervisory), 05-08			
10292	Master Agreement between the City of Detroit and Detroit Police Lieutenants and Sergeants Association, 01-06			
10295	Master Agreement between the City of Detroit and the U.A.W. Local 2211, 05-08			
10297	Master Agreement between the City of Detroit and SCATA U.A.W. - Local 2334, 05-08			
10298	Master Agreement between the City of Detroit and the Detroit Senior Water Systems Chemists Association, 05-08			
10299	Master Agreement between the City of Detroit and Teamsters State, County and Municipal Workers Local 214, 05-08			
10399	Memorandum Of Understanding Between The City Of Detroit And The Detroit Police Lieutenants' And Sergeants' Association			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10401	Master Agreement Between The City Of Detroit And The Association Of City Of Detroit Supervisors 1998 - 2001			
10402	Master Agreement Between The City Of Detroit And Michigan Council 25 Local 1023 Of The American Federation Of State, County And Municipal Employees, AFL-CIO Emergency Services Operators Chapter 1998 - 2001			
10403	Master Agreement Between The City Of Detroit And Michigan Council 25, American Federation Of State, County And Municipal Employees, AFL-CIO, Motor City Seasonal Workers Union, Local 542 1998 - 2001			
10408	Master Agreement Between The City Of Detroit Department Of Transportation And Division 26 Amalgamated Transit Union, AFL-CIO 1998 - 2001			
10414	Master Agreement Between The City Of Detroit And The Detroit Field Engineers' Association 1998 - 2001			
10415	Master Agreement Between The City Of Detroit And Park Management Association 1998 - 2001			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10416	Master Agreement Between The City Of Detroit And Police Officers Labor Council Health Department - Herman Kiefer Complex 1998 - 2001			
10417	Master Agreement Between The City Of Detroit And Police Officers Labor Council Detention Facility Officers 1998 - 2001			
10418	Master Agreement Between The City Of Detroit And Teamsters State, County And Municipal Workers Local 214 1998 - 2001			
10419	Master Agreement Between The City Of Detroit And The Utility Workers Of America Local 488 1998 - 2001			
10420	Master Agreement Between The City Of Detroit And The Utility Workers Union Of America, Local 504 1998 - 01			
10421	Master Agreement Between The City Of Detroit And Utility Workers Of America, Local 531 1998 - 2001			
10423	Master Agreement Between The City Of Detroit And The Association Of Professional Construction Inspectors 1995 - 98			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10438	Master Agreement Between The City Of Detroit And The I.U.O.E Local 547 - E Charter International Union Of Operating Engineers (Emergency Mobile Medical Technicians & Trainees Association) E.M.M.T.T.A. 2005 - 2009			
10440	Master Agreement Between The City Of Detroit And Michigan Council 25 Of The American Federation Of State County And Municipal Employees, AFL-CIO (Non-Supervisory Bargaining Unit) July 1, 2005 - June 30, 2008			
10442	Master Agreement Between The City Of Detroit And The Association Of Professional And Technical Employees 2005 - 2008			
10445	Master Agreement Between The City Of Detroit And The Building Trades Foreman City Wide Unit Of The Detroit Building And Construction Trades Council 2005 - 2008			
10448	Master Agreement Between The City Of Detroit And The Detroit Police Command Officers Association 2004 - 2009			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10450	Master Agreement Between The City Of Detroit And The Detroit Police Officers Association 2004 - 2009			
10455	Master Agreement Between The City Of Detroit And The International Union Of Operating Engineers - Local 547 (Detroit Principal Clerks Unit) 2005 - 2008			
10456	Master Agreement Between The City Of Detroit And Senior Accountants, Analysts And Appraisers Association 2005 - 2008			
10458	Master Agreement Between The City Of Detroit And The Service Employees International Union, Local 517M (Non-Supervisory Bargaining Unit) 2005 - 2008			
10461	Master Agreement Between The City Of Detroit And The U.A.W. Local 212 United Automobile, Aerospace And Agricultural Implement Workers Of America, Police Commission Civilian Investigators 2005 -2008			
10462	Master Agreement Between The City Of Detroit And The Association Of Detroit Engineers 2001 - 2005			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10463	Master Agreement Between The City Of Detroit And Michigan Council 25 Local 1023 Of The American Federation Of State, County And Municipal Employees, AFL-CIO Emergency Services Operators Chapter 2001 - 2005			
10468	Master Agreement Between The City Of Detroit And The Association Of Municipal Engineers 2001 - 2005			
10471	Master Agreement Between The City Of Detroit And The Detroit Building And Construction Trades Council AFL-CIO 2001 - 2005			
10474	Master Agreement Between The City Of Detroit And The Detroit License Investigators Association 2001 - 2005			
10476	Master Agreement Between The City Of Detroit And The I.U.O.E Local 547 - E Charter International Union Of Operating Engineers (Emergency Mobile Medical Technicians & Trainees Association) E.M.M.T.T.A. 2001 - 2005			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10477	Master Agreement Between The City Of Detroit And International Union Of Operating Engineers, Local 547 AFL-CIO 2001 - 2005			
10478	Master Agreement Between The City Of Detroit And AFSCME DPW Paving Forepersons Michigan Council 25 2001 - 2005			
10479	Master Agreement Between The City Of Detroit And Senior Accountants, Analysts And Appraisers Association 2001 - 2005			
10480	Master Agreement Between The City Of Detroit And The Local 517M Of The Service Employees International Union, (Non-Supervisory Bargaining Unit) 2001 - 2005			
10519	Master Agreement Between The City Of Detroit And Michigan Council 25 Of The American Federation Of State County And Municipal Employees, AFL-CIO (Non-Supervisory Bargaining Unit) July 1, 2008 - June 30, 2012			
10520	Master Agreement Between The City Of Detroit And The Assistant Supervisors Of Street Maintenance And Construction Association			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	2008 - 2012			
10521	In The Matter Of: City Of Detroit And Detroit Building And Construction Trades Council, AFL-CIO; Fact Finder's Report And Recommendations		Hearsay	
10522	Master Agreement Between The City Of Detroit And The Detroit Income Tax Investigators Association 2008 - 2012			
10523	Master Agreement Between The City Of Detroit And The International Union Of Operating Engineers, Local 324 AFL-CIO 2008 - 2012			
10524	Master Agreement Between The City Of Detroit And Association Of Municipal Inspectors 2008 - 2012			
10525	Master Agreement Between The City Of Detroit And The International Union Of Operating Engineers - Local 324 (Detroit Principal Clerks Unit) 2008 - 2012			
10527	Master Agreement Between The City Of Detroit And Teamsters State, County And Municipal Workers Local 214 2008 - 2012			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10530	Memorandum Of Understanding Between The City Of Detroit Department Of Transportation And Amalgamated Transit Union, AFL-CIO - Division 26 2012 - 2014			
10531	Memorandum Of Understanding Between The City Of Detroit And The Michigan Building And Construction Trades Council AFL-CIO 2012 - 2014			
10532	Memorandum Of Understanding Between The City Of Detroit And International Union Of Operating Engineers, Local 324 AFL-CIO 2012 - 2014			
10534	Memorandum Of Understanding Between The City Of Detroit And Teamsters State, County And Municipal Workers Local 214 2012 - 2014			
10540	Agreement Between The City Of Detroit And The Association Of Professional And Technical Employees 1998 - 2001			
10630	Master Agreement Between The City Of Detroit And The Detroit Policy Officers Association 2001 - 2004			
10634	Master Agreement Between The City Of Detroit And The Association Of City Of			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	Detroit Supervisors 2001 - 2005			
10641	Master Agreement Between The City Of Detroit And The Association Of Professional And Technical Employees 2001 - 2005			
10642	2001-2005 Master Agreement, Amalgamated Transit Union, Division 26.			
10648	2001-2005 Master Agreement, Detroit Income Tax Investigators Association			
10649	2001-2005 Master Agreement, DoT Foreman's Association of America (Non-Supervisory			
10654	2001-2005 Master Agreement, Detroit Field Engineers' Association			
10657	2001-2005 Master Agreement, Motor City Seasonals, Michigan Council 25, Local 542			
10658	2001-2005 Master Agreement, AFSCME DPW Paving Forepersons, Michigan Council 25			
10659	2001-2005 Master Agreement, Police Officers Labor Council Detention Facility Officers			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10660	2001-2005 Master Agreement, Police Officers Labor Council, Health Dept. - Herman Kiefer Complex			
10661	2001-2005 Master Agreement, Senior Accountants, Analyst and Appraisers Association			
10663	2001-2005 Master Agreement, Detroit Senior Water Systems Chemists Association			
10665	2001-2005 Master Agreement, UAW, Local 2334 - SCATA			
10667	2001-2005 Master Agreement, Utility Workers of America, Local 488			
10669	2001-2005 Master Agreement, UTILITY WORKERS UNION OF AMERICA, LOCAL 504			
10670	2001-2005 Master Agreement, UTILITY WORKERS OF AMERICA - LOCAL 531			
10672	2001-2005 Master Agreement, TEAMSTERS STATE, COUNTY AND MUNICIPAL WORKERS, LOCAL 214			
10674	2002-2005 Master Agreement, ASSOCIATION OF MUNICIPAL INSPECTORS			
10675	2001-2005 Master Agreement, PARK			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	MANAGEMENT ASSOCIATION			
10677	Index			
10691	2005-2008 Master Agreement, ASSOCIATION OF CITY OF DETROIT SUPERVISORS			
10694	2005-2008 Master Agreement, ASSOCIATION OF MUNICIPAL ENGINEERS			
10697	2005-2008 Master Agreement, ASSISTANT SUPERVISORS OF STREET MAINTENANCE AND CONSTRUCTION ASSOCIATION			
10742	2005-2012 Master Agreement, DETROIT LICENSE INVESTIGATORS ASSOCIATION			
10743	2005-2012 Master Agreement, U. A. W. LOCAL 412 Unit 86 United Automobile, Aerospace and Agricultural Implement Workers of America, City of Detroit Law Department Paralegals			
10747	2008-2012 Master Agreement, ASSOCIATION OF MUNICIPAL ENGINEERS			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10748	2008-2012 Master Agreement, ASSOCIATION OF PROFESSIONAL CONSTRUCTION INSPECTORS			
10750	2008-2012 Master Agreement, AMALGAMATED TRANSIT UNION, AFL-CIO - DIVISION 26			
10751	2008-2012 Master Agreement, DETROIT BUILDING AND CONSTRUCTION TRADES COUNCIL			
10752	2008-2012 Master Agreement, BUILDING TRADES FOREMEN CITY WIDE UNIT OF THE DETROIT BUILDING AND CONSTRUCTION TRADES COUNCIL			
10755	2008-2012 Master Agreement, DEPARTMENT OF TRANSPORTATION FOREMEN'S ASSOCIATION OF AMERICA, LOCAL 337 (Non-Supervisory)			
10756	2008-2012 Master Agreement, SUPERVISOR'S CHAPTER OF THE D.O.T. FOREMAN'S ASSOCIATION			
10757	2008-2012 Master Agreement, FORESTRY & LANDSCAPE FOREMEN LOCAL 1206			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10761	2008-2012 Master Agreement, International Union of Operating Engineers - Local 324 (PARK MANAGEMENT)			
10762	2008-2012 Master Agreement, POLICE OFFICERS LABOR COUNCIL - DETENTION FACILITY OFFICERS			
10763	2008-2012 Master Agreement, POLICE OFFICERS LABOR COUNCIL HEALTH DEPARTMENT - HERMAN KIEFER COMPLEX			
10765	2008-2012 Master Agreement, SENIOR ACCOUNTANTS, ANALYSTS AND APPRAISERS ASSOCIATION			
10766	July 1, 2008 – June 30, 2012 Master Agreement, SERVICE EMPLOYEES INTERNATIONAL UNION, LOCAL 517M (Professional/Technical)			
10767	2008-2012 Master Agreement, SERVICE EMPLOYEES INTERNATIONAL UNION, LOCAL 517M (Non Supervisory Bargaining Unit)			
10768	2008-2012 Master Agreement, SERVICE EMPLOYEES INTERNATIONAL UNION, LOCAL 517 M, HEALTH & WELLNESS PROMOTION			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	DEPARTMENT (SUPERVISORY UNIT)			
10769	2008-2012 Master Agreement, DETROIT SENIOR WATER SYSTEMS CHEMISTS ASSOCIATION			
10771	2008-2012 Master Agreement, UAW Region 1, Local 2200 OF THE UNITED AUTOMOBILE, AEROSPACE AND AGRICULTURAL IMPLEMENT WORKERS OF AMERICA (WASTEWATER TREATMENT PLANT SUPERVISORS)			
10772	2008-2012 Master Agreement, U. A. W. LOCAL 2211 United Automobile, Aerospace and Agricultural Implement Workers of America, PUBLIC ATTORNEYS ASSOCIATION			
10773	2008-2012 Master Agreement, U. A. W. LOCAL 212 United Automobile, Aerospace and Agricultural Implement Workers of America, Civilian Police Investigators Police Commission			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10774	2008-2012 Master Agreement, UTILITY WORKERS OF AMERICA, LOCAL 488			
10775	2008-2012 Master Agreement, UTILITY WORKERS UNION OF AMERICA, LOCAL 504			
10780	2009-2013 Master Agreement, MICHIGAN COUNCIL 25, LOCAL 1023 EMERGENCY SERVICES OPERATORS CHAPTER			
10892	2001-2005 Master Agreement, ASSISTANT SUPERVISORS OF STREET MAINTENANCE AND CONSTRUCTION ASSOCIATION			
10893	2001-2005 Master Agreement, LOCAL 1206 OF THE AMERICAN FEDERATION OF STATE COUNTY AND MUNICIPAL EMPLOYEES, AFL-CIO, MICHIGAN COUNCIL #25 (DETROIT FORESTRY AND LANDSCAPE FOREMAN'S UNION)			
10895	2001-2005 Master Agreement, SERVICE EMPLOYEES INTERNATIONAL UNION, LOCAL 517 M, HEALTH DEPARTMENT, SUPERVISORY UNIT			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10900	October 16, 2001 to June 30, 2002 Master Agreement, ASSOCIATION OF MUNICIPAL INSPECTORS			
10901	April 26, 2001 to June 30, 2002 Master Agreement, SERVICE EMPLOYEES INTERNATIONAL UNION - LOCAL 517M (Professional/Technical)			
10902	1998-2001 Master Agreement, ASSOCIATION OF MUNICIPAL ENGINEERS			
10906	1998-2001 Master Agreement, SERVICE EMPLOYEES INTERNATIONAL UNION, LOCAL #808 M, NON SUPERVISORY UNIT			
10907	1998-2001 Master Agreement, SERVICE EMPLOYEES INTERNATIONAL UNION, LOCAL 808 M, HEALTH DEPARTMENT SUPERVISORY UNIT			
10909	1998-2001 Master Agreement, ASSOCIATION OF DETROIT ENGINEERS			
10911	1998-2001 Master Agreement, AFSCME, LOCAL 2394 MICHIGAN COUNCIL 25, SUPERVISORY UNIT			
10912	1998-2001 Master Agreement,			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
	ASSOCIATION OF PROFESSIONAL CONSTRUCTION INSPECTORS			
10914	1998-2001 Master Agreement, ASSISTANT SUPERVISORS OF STREET MAINTENANCE AND CONSTRUCTION ASSOCIATION			
10915	1998-2001 Master Agreement, DETROIT BUILDING AND CONSTRUCTION TRADES COUNCIL AFL-CIO			
10918	1998-2001 Master Agreement, BUILDING TRADES FOREMEN, CITY WIDE UNIT OF THE DETROIT BUILDING AND CONSTRUCTION TRADES COUNCIL			
10920	1998-2001 Master Agreement, DETROIT LICENSE INVESTIGATORS ASSOCIATION			
10928	1998-2001 Master Agreement, DETROIT FORESTRY AND LANDSCAPE UNION AFSCME, LOCAL 1206 MICHIGAN COUNCIL 25			
10929	1998-2001 Master Agreement, INTERNATIONAL UNION OF OPERATING ENGINEERS, LOCAL 547 AFL-CIO			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10933	1998-2001 Master Agreement, DPW PAVING FOREPERSONS' ASSOCIATION			
10936	1998-2001 Master Agreement, DETROIT PRINCIPAL CLERKS ASSOCIATION			
10937	1998-2001 Master Agreement, SENIOR ACCOUNTANTS, ANALYSTS AND APPRAISERS ASSOCIATION			
10938	1998-2001 Master Agreement, DETROIT SENIOR WATER SYSTEMS CHEMISTS ASSOCIATION			
10939	1998-2001 Master Agreement, DETROIT INCOME TAX INVESTIGATORS ASSOCIATION			
10942	1998-2001 Master Agreement, U. A. W. LOCAL 2211, United Automobile, Aerospace and Agricultural Implement Workers of America, PUBLIC ATTORNEYS ASSOCIATION			
10943	1998-2001 Master Agreement, United Automobile, Aerospace & Agricultural Implement Workers of America - UAW, Local 2334 - SCATA,			

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10945	1998-2001 Master Agreement, UTILITY WORKERS OF AMERICA LOCAL 488			
10946	1998-2001 Master Agreement, UTILITY WORKERS UNION OF AMERICA, LOCAL 504			
10947	1998-2001 Master Agreement, UTILITY WORKERS OF AMERICA, LOCAL 531			
10948	1998-2001 Master Agreement, INTERNATIONAL UNION OF OPERATING ENGINEERS, LOCAL 547 E CHARTER (Emergency Mobile Medical Technicians & Trainees Association) E.M.M.T.T.A.			
10951	1995-1998 Master Agreement, INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL 547 E CHARTER, (Emergency Mobile Medical Technicians & Trainees Association) E.M.M.T.T.A.	Macomb objects on the ground that the document is an improper exhibit. Deposition designations will be handled separately as stipulated. Macomb further objects on the ground that the document is		

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
		hearsay.		
10969	Deposition of Stephen Rosen	Macomb objects on the ground that the document is an improper exhibit. Deposition designations will be handled separately as stipulated. Macomb further objects on the ground that the document is hearsay.	Hearsay	
10970	Deposition of Joseph Esuchanko	Macomb objects on the ground that the document is an improper exhibit. Deposition designations will be handled separately as stipulated. Macomb further objects on the ground that the document is	Hearsay	

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
		hearsay.		
10971	Deposition of Kelly Cave	Macomb objects on the ground that the document is an improper exhibit. Deposition designations will be handled separately as stipulated. Macomb further objects on the ground that the document is hearsay.	Hearsay	
10972	Deposition of William Stannard	Macomb objects on the ground that the document is an improper exhibit. Deposition designations will be handled separately as stipulated. Macomb further objects on the ground that the document is hearsay.	Hearsay	

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10973	Deposition of Sidney Lockhart	Macomb objects on the ground that the document is an improper exhibit. Deposition designations will be handled separately as stipulated. Macomb further objects on the ground that the document is hearsay.	Hearsay	
10974	Deposition of Kenneth Kucel	Macomb objects on the ground that the document is an improper exhibit. Deposition designations will be handled separately as stipulated. Macomb further objects on the ground that the document is hearsay.	Hearsay	

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10975	Deposition of Jason Matteo	Macomb objects on the ground that the document is an improper exhibit. Deposition designations will be handled separately as stipulated. Macomb further objects on the ground that the document is hearsay.	Hearsay	
10976	Deposition of William "Kriss" Andrews	Macomb objects on the ground that the document is an improper exhibit. Deposition designations will be handled separately as stipulated. Macomb further objects on the ground that the document is hearsay.	Hearsay	

Exhibit No.	Description of Document	Macomb County Objections	Syncora Objections	DWSD Parties
10977	Deposition of Robert J. Daddow		Hearsay	
10978	**Any exhibit identified by any other party.**		Objections incorporated from those exhibits.	

ATTACHMENT C

THE RETIREMENT SYSTEMS' EXHIBIT LIST WITH OBJECTORS' OBJECTIONS

Exhibit Number	Exhibit Description	Objection
2000	Annual Report of the GRS Board of Trustees (2005)	
2001	Annual Report of the GRS Board of Trustees (2006)	
2002	Annual Report of the GRS Board of Trustees (2007)	
2003	Annual Report of the GRS Board of Trustees (2008)	
2004	Annual Report of the GRS Board of Trustees (2009)	
2005	Annual Report of the GRS Board of Trustees (2010)	
2006	Annual Report of the GRS Board of Trustees (2011)	
2007	Annual Report of the PFRS Board of Trustees (2005)	
2008	Annual Report of the PFRS Board of Trustees (2006)	
2009	Annual Report of the PFRS Board of Trustees (2007)	
2010	Annual Report of the PFRS Board of Trustees (2008)	
2011	Annual Report of the PFRS Board of Trustees (2009)	
2012	Annual Report of the PFRS Board of Trustees (2010)	
2013	Annual Report of the PFRS Board of Trustees (2011)	

Exhibit Number	Exhibit Description	Objection
2014	Resolutions of the GRS and PFRS Supporting Plan of Adjustment (2014)	
2015	PFRS Investment Policy (2014)	
	Any exhibit listed by any other party	
	Any document necessary for rebuttal or impeachment	

ATTACHMENT D

SYNCORA'S CONSOLIDATED
(1) WITNESS LIST AND (2) EXHIBIT LIST

Syncora Capital Assurance Inc. and Syncora Guarantee Inc. ("Syncora") submit the following consolidated witness list and exhibit list for the September 2, 2014 hearing on the City's Plan of Adjustment:

I. *Witness List*

Syncora hereby submits the following list of witnesses who will be called:

1. Elizabeth Von Habsburg, Managing Director, Winston Art Group
2. Glenn D. Meyers, Managing Director, FTI Consulting, Inc.
3. Kevin M. Murphy, George J. Stigler Distinguished Service Professor of Economics, University of Chicago
4. Stephen Rosen, Managing Director, FTI Consulting, Inc.
5. Gary Evanko, Chief Assessor, City of Detroit
6. Michael Hall, Director of Human Resources and Labor Relations, City
7. Marcel Todd, Senior Planner, City Planning Commission
8. Cynthia Thomas, Executive Director, Detroit Retirement Systems
9. Ryan Bigelow, Chief Investment Officer, Detroit Retirement Systems
10. Judith Kermans, 30(b)(6) designee for Gabriel Roeder Smith

Syncora hereby submits the following list of witnesses who may be called:

1. Sonya Mays, Senior Advisor, Office of the Emergency Manager

2. Shani Penn, Chief of Staff, Office of the Emergency Manager

Syncora reserves the right to call any witness on any party's witness list.

II. *Exhibit List*

Syncora submits the following exhibits for use at the hearing on the City's Plan of Adjustment. Syncora reserves the right to supplement this list of exhibits. Syncora also reserves the right to use any exhibit listed by any other party in this case. Syncora also reserves the right to supplement its objections to any party's exhibits, a reservation of rights which the City disputes.

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4001	Evanko Ex. 1 - Biography of Gary Evanko from City of Dearborn Website	Hearsay	
4002			
4003	Evanko Ex. 3 - Detroit City Government Revenues Report	Hearsay	
4004	Evanko Ex. 4 - The Detroit News Article re "Detroit Landlords Cash in on Rent Aid, Ignore Tax Bills"	Hearsay, Relevance, Speculation	
4005	Evanko Ex. 5 - The Detroit News Article re "Detroit's Property Tax System Plagued by Mistakes, Waste"	Hearsay, Relevance, Speculation	
4006	Evanko Ex. 6 - The Detroit News Article re "Half of Detroit Property Owners Don't Pay Taxes"	Hearsay, Relevance, Speculation	
4007	Evanko Ex. 7 - Plante Moran Report re City of Detroit Assessing Division draft	Hearsay	
4008	Evanko Ex. 8 - Plante Moran Report re City of Detroit Assessing Division Operational Recommendations draft	Hearsay	
4009	Evanko Ex. 9 - 12/8/13 Memorandum to Michigan Department of Treasury re City of Detroit Assessing Division Corrective Action Plan	No Objection	
4010	Evanko Ex. 10 - Letter to Lt. Governor Calley re City of Detroit	Hearsay	
4011	Evanko Ex. 9 - 12/8/13 Memorandum to Michigan Department of Treasury re City of Detroit Assessing Division Corrective Action Plan	No Objection	
4012	Evanko Ex. 9 - 12/8/13 Memorandum to Michigan Department of Treasury re City of Detroit Assessing Division Corrective Action Plan	No Objection	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4013			
4014	Evanko Ex. 14 - 1/21/14 Email from Gary Evanko re City of Detroit Assessed Value Proforma	Hearsay, Foundation	
4015	Bowen Ex. 1 - 7/6/2012 Letter to Chris Brown re City of Detroit• Initial Assessment of Current Pension and Postretirement Health Situation	No Objection	
4016	Bowen Ex. 2 - 11/4/2013 Letter to Evan Miller re Recommended Investment Return Assumption as of June 30, 2013 for DGRS	No Objection	
4017	Bowen Ex. 3 - 11/4/2013 Letter to Evan Miller re Recommended Investment Return Assumption as of June 30, 2013 for DPFRS	No Objection	
4018	Bowen Ex. 4 - Investment Policy Statement Review	No Objection	
4019	Bowen Ex. 5 - Milliman 2012 Public Pension Funding Study	No Objection	
4020	Bowen Ex. 6 - Milliman 2013 Public Pension Funding Study	No Objection	
4021	Bowen Ex. 7 - 4/17/2014 Letter to Evan Miller re DGRS Actuarial Accrued Liability as of June 30, 2013	No Objection	
4022	Bowen Ex. 8 - 5/4/2014 Letter to Evan Miller re DPFRS Individual Claim Allocation as of June 30, 2013 for active and inactive members - updated	No Objection	
4023	Bowen Ex. 9 - 3/6/2014 Memorandum to Evan Miller re Proposed Approach to Requested Benefit Modeling	No Objection	
4024	Bowen Ex. 11 - City of Detroit 40-year Financial Projections	No Objection	
4025	Bowen Ex. 12 - Biography of Glen Bowen from Milliman	No Objection	
4026	Bowen Ex. 13 - 7/16/2013 Email from Glen Bowen re Milliman work cited - Editorial - "Detroit Free Press"	Hearsay, Relevance	
4027	Bowen Ex. 14 - Public Survey Fund Actuarial Assumptions	Hearsay	
4028	Bowen Ex. 15 - NASRA Issue Brief: Public Pension Plan Investment Return Assumptions	Hearsay; Duplicative of Syncora 4265, 4303, 4327	
4029	Bowen Ex. 16 - General Retirement System vs Police & Fire Retirement System from 1989-2013	No Objection	
4030	Bowen Ex. 17 - 5/5/2014 Letter to Evan Miller re DGRS Individual Claim Allocation as of June 30, 2013 for active and inactive members - updated	No Objection	
4031			
4032	Bowen Ex. 19 - 6/10/2014 Letter to Evan Miller re DGRS Estimated Employer Contributions Required in 2014-2015 to 2022-2023	No Objection	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4033	Bowen Ex. 20 - Actuarial Standards Board: Selection of Economic Assumptions for Measuring Pension Obligations	No Objection	
4034	Bowen Ex. 21 - Actuarial Standards Board: Measuring Pension Obligations and Determining Pension Plan Costs or Contributions	No Objection	
4035	Bowen Ex. 22 - The General Retirement System of The City of Detroit 75th Annual Actuarial Valuation	No Objection	
4036	Bowen Ex. 23 - The Police and Fire Retirement System of the City of Detroit 72nd Annual Actuarial Valuation	No Objection	
4037	Bowen Ex. 24 - Human Resources Update/Discussion with Restructuring Advisory Task Force	No Objection	
4038	Hall Ex. 1 - Monthly Headcount Reports (March 2013-March 2014)	Foundation, Lack of Authentication, Hearsay	
4039	Hall Ex. 2 - Fox News Article re "Report Detroit EM Cuts Retirees' Health Benefits"	Hearsay, Irrelevant, Speculation	
4040	Hall Ex. 3 - Detroit Free Press Article re "Detroit Retirees get Feb. Extension on Health Care"	Hearsay, Relevance, Speculation	
4041	Hall Ex. 4 - CNN News Article re "Detroit Bankruptcy Plan Proposes Slashing Pension Benefits p to 34%"	Hearsay, Relevance, Speculation	
4042	Thomas Ex. 1 - Police and Fire Retirement System of the City of Detroit Proposed Asset Allocation Policy Targets-Alternative B	Hearsay	
4043	Thomas Ex. 2 - General Retirement System of the City of Detroit Meeting Materials	No Objection	
4044	Thomas Ex. 3 - General Retirement System vs. Police &Fire Retirement System From 1989-2013	No Objection	
4045	Thomas Ex. 4 - 7/6/2012 Letter to Chris Brown re City of Detroit - Initial Assessment of Current Pension and Postretirement Health Situation	No Objection	
4046	Thomas Ex. 5 - 3/22/2013 Email from Kriss Andrews re Statements	No Objection	
4047	Thomas Ex. 6 - Offering Circular re Taxable Certificates Series 2005	No Objection; Stipulated	
4048	Thomas Ex. 7 - 7/10/2013 Email from Angela Lewis re Escalator Elimination	No Objection	
4049	Thomas Ex. 8 - Investment Management Mandate Pipeline Article re "'5 Questions' with Cynthia Thomas, Detroit Retirement Systems"	Hearsay, Foundation; Relevance	
4050	Thomas Ex. 9 - 10/9/2013 Letter to Kevyn Orr and Saul Green re Emergency Manager Order No. 16	Hearsay, Relevance	
4051	Thomas Ex. 10 - The General Retirement System of the City of Detroit 74th Annual Actuarial Valuation	No Objection	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4052	Thomas Ex. 11 - Financial Spreadsheet	Hearsay, Foundation	
4053	Thomas Ex. 12 - The General Retirement System of the City of Detroit 72nd Annual Actuarial Valuation-Revised	No Objection	
4054	Thomas Ex. 13 - The General Retirement System of the City of Detroit 73rd Annual Actuarial Valuation	No Objection	
4055	Thomas Ex. 14 - City of Detroit General Retirement System 69th Annual Actuarial Valuation	No Objection	
4056	Thomas Ex. 15 - City of Detroit General Retirement System 70th Annual Actuarial Valuation	No Objection	
4057	Thomas Ex. 16 - 5/7/2014 Letter to Evan Miller re Estimated Funded Status in 2033 and 2043 for DGRS	No Objection	
4058	Todd Ex. 1 - City of Detroit Master Plan of Policies Revision Executive Summary	No Objection	
4059	Todd Ex. 2 - Detroit Future City: 2012 Detroit Strategic Framework Plan	No Objection	
4060			
4061	Todd Ex. 4 - City Council Review Restructuring Recommendations	No Objection	
4062	Todd Ex. 5 - Letter from Marcell Todd to Kriss Andrews re Conway MacKenzie's April 5, 2013 City Council Review, Restructuring Recommendations	No Objection	
4063	Todd Ex. 6 - Letter from City of Detroit City Planning Commission to City Council re Potential Restructuring and Transfer of Functions	No Objection	
4064	Todd Ex. 7 - Detroit Free Press Article re “Taming Detroit's Bureaucracy: After Conquering Debt, Orr Looks to Streamline Planning and Development”	Hearsay, Relevance, Speculation	
4065	Todd Ex. 8 - Detroit Free Press Article re “Detroit Economic Growth Corp. Chief George Jackson Resigns After Duggan Move”	Hearsay, Relevance, Speculation	
4066	Todd Ex. 9 - City of Detroit Master Plan of Policies	No Objection	
4067			
4068	Cline Ex. 2 - The Detroit News Article re “‘Reverse Commute’ May Hike Tax Bill”	Hearsay, Relevance, Speculation	
4069	Cline Ex. 3 - 3/14/2014 Email from Cherie Polk re Financial Advisory Board Meeting on 3/18/2014	Hearsay, Relevance	
4070	Cline Ex. 5 - City of Detroit's Amended Identification of Witnesses	No Objection	
4071	Cline Ex. 6 - Income Tax Division-Outstanding Receivables	No Objection	
4072	Cline Ex. 7 - Michigan State University City of Detroit Revenue Forecast Memo	Hearsay, Foundation	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4073	Cline Ex. 8 - City and Metro Population-Data from Brookings Report	No Objection	
4074	Cline Ex. 9 - Comparison of Assumptions, Revenue Consensus, and Plan of Adjustment	No Objection	
4075	Malhotra Ex. 1 - City of Detroit 10-Year Financial Projections	No Objection	
4076			
4077	Malhotra Ex. 4 - 3/14/2014 Email from Cherie Poll re Financial Advisory Board Meeting on 3/18/2014	Hearsay, Relevance	
4078			
4079	Malhotra Ex. 6 - Detroit Blight Removal Task Force Plan	No Objection	
4080	Malhotra Ex. 7 - The Detroit News Article re "'Reverse Commute' May Hike Tax Bill"	Hearsay, Relevance, Speculation	
4081	Malhotra Ex. 8 - 2/19/2013 Letter to Governor Snyder re Supplemental Documentation of the Detroit Financial Review Team	No Objection	
4082			
4083	Malhotra Ex. 10 - Detroit Public Schools FY 2015 Proposed Budgets	No Objection	
4084	Buckfire Ex. 22 - Analysis of New Water/Sewer Authority	No Objection	
4085	Buckfire Ex. 23 - Transcript of Conversation Between Bloomberg Help Desk and Kyle Herman	No Objection	
4086	Buckfire Ex. 24 - Updated Pro Forma & Restructuring Analysis	Hearsay; Speculation	
4087	Buckfire Ex. 25 - 10/18/2013 - Oakland County Business Issues Memo, Conway/Miller Buckfire Response	Hearsay	
4088	Buckfire Ex. 26 - Presentation to Miller Buckfire & Co	No Objection	
4089	Buckfire Ex. 27 - 2/5/2014 Email from Robert Daddow re GLWSA MOU Appendix and Summary	Hearsay, Relevance	
4090			
4091			
4092	Buckfire Ex. 30 - 10/22/2013 Email from Kenneth Buckfire re County Follow Up re Spec. Millage Proposal	Hearsay	
4093	Buckfire Ex. 31 - 5/9/2013 Email from Kenneth Buckfire re DIA Visit	Hearsay	
4094	Buckfire Ex. 32 - Christie's Appraisals, Inc-Agreement Between Detroit, Buckfire, and Christie's	Hearsay	
4095	Buckfire Ex. 33 - 8/4/2013 Letter to Kenneth Buckfire re Appraisal Agreement	Hearsay	
4096	Buckfire Ex. 34 - 8/25/2013 Email from Allison Whiting to Kenneth Buckfire re Meeting With DIA	Hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4097	Buckfire Ex. 35 - 5/7/2013 Email from Gene Gargaro to Kenneth Buckfire re DIA	Hearsay	
4098			
4099	"Detroit bankruptcy: How fast will it go?" [Article-Free P. 7/23/13]	Hearsay, Relevance, Speculation	
4100	"Detroit bankruptcy plan includes deep pension cuts" [Article - LA times, A. Seumuels 2/22/14]	Hearsay, Relevance, Speculation	
4101	"Detroit's New Plan" [Article-Asset int. 4/1/14]	Hearsay, Relevance, Speculation	
4102	"Post-Emergency Discipline": A transcript of Kevyn Orr at UM	Hearsay, Relevance, Speculation	
4103	POA00173457 Email (5/28/13) Nowling to Orr re Thoughts on DIA	Hearsay	
4104	POA00000761 Memo (11/11/11) Ford III to City Officials re Draft Proposal for Cumulative Monetization of Cultural Assets - DIA	Hearsay	
4105	POA00170255 Email (10/17/13) Orr to Buckfire and Muchmore re Ron Weiser call	Hearsay, Speculation	
4106	POA00177511 Email letter Screenivas Cherukuri to Orr re Spin-off scenarios for Parking and PLD	Hearsay, Relevance, Speculation	
4107	Hill Ex. 2 - DC Fiscal Policy Institute: DC Took a Balanced Approach to Addressing its Last Major Deficit	Hearsay, Relevance, Speculation	
4108	Hill Ex. 3 - Chicago Fed Letter: After Detroit: How Will Illinois and its Communities Respond?	Hearsay, Relevance, Foundation	
4109	Hill Ex. 4 - Recovery Process for Two Financially Distressed Cities: Washington, DC Financial Control Board and the City of Detroit Financial Emergency	Hearsay, Foundation	
4110	Hill Ex. 5 - Yahoo Finance News Article re “Detroit CFO Says Post-Bankruptcy Oversight Critical for City”	Hearsy, Relevance, Speculation	
4111	Hill Ex. 6 - 1/23/2014 Email from John Hill re Mayor's Characterization of the Plan of Adjustment	Hearsay	
4112	Hill Ex. 7 - 12/9/2013 Email from John Hill re Income Tax and Assessor's Division Report	No Objection	
4113	Hill Ex. 8 - 3/19/2014 Email from John Hill re Office of the Chief Economist Information	Hearsay, Relevance	
4114	Hill Ex. 9 - 11/23/2013 Email from John Hill re City of Detroit CAFR	No Objection	
4115	Hill Ex. 10 - 11/27/2013 Email from John Naglick re City of Detroit Risk Management Department	No Objection	
4116	Hill Ex. 11 - 4/16/2014 Memorandum from Mark Lockridge re Report on the Plan of Adjustment For The Debts of The City of Detroit	No Objection	
4117	Hill Ex. 12 - 3/14/2014 Email from Cherie Polk re Financial Advisory Board (FAB) Meeting on 3/18/2014	Hearsay, Foundation	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4118	Hill Ex. 13 - Letter from Ernst & Young re City of Detroit: Plan of Adjustment 40-Year Projections	Foundation	
4119	Hill Ex. 14 - 12/6/2013 Email from Charles Moore re AlixPartners Document	Hearsay, Foundation	
4120	Hill Ex. 15 - 2/12/2014 Email from John Hill re Revenue Conference Documents	No Objection	
4121	Hill Ex. 16 - 3/28/2014 Email from John Hill re DPD Promotions and Financial Impact	No Objection	
4122	Hill Ex. 17 - 4/2/2014 Email from John Hill re Budget Amendment	Hearsay	
4123	Hill Ex. 18 - 5/19/2014 Letter from David Whitaker re 2014-2015 Budget Analysis	No Objection	
4124	Hill Ex. 19 - 5/15/2014 Letter from David Whitaker re 2014-2015 Budget Analysis	No Objection	
4125			
4126	Hill Ex. 21 - 2/4/2014 Email from John Naglick re FAB Detroit Revenue Conference	No Objection	
4127	Hill Ex. 22 - Board of Trustees of the Policemen and Firemen Retirement System of The City of Detroit vs. City of Detroit Judgment for Plaintiff	No Objection	
4128	Hill Ex. 23 - Detroit Police Lieutenants and Sergeants Association vs. City of Detroit, Case No. 92-218718-AW Judgment for Plaintiff	No Objection	
4129	Hill Ex. 24 - Detroit: Facts on Bankruptcy and Transformation	Hearsay, Foundation	
4130			
4131	Bing Ex. 1 - City of Detroit-Restructuring Plan	No Objection	
4132	Bing Ex. 2 - Detroit Free Press News Article re “Full Text of Mayor Dave Bing's State of the City Address”	Hearsay, Relevance, Speculation	
4133	Bing Ex. 3 - Wall Street Journal News Article re “Can Detroit Be Saved?”	Hearsay, Relevance, Speculation	
4134	Bing Ex. 4 - The Guardian News Article re “Detroit Mayor Plans to Shrink City by Cutting Services to Some Areas”	Hearsay, Relevance, Speculation	
4135	Bing Ex. 5 - 2/19/2013 Letter to Governor Snyder re Report of the Detroit Financial Review Team	No Objection	
4136	Bing Ex. 6 - MLive News Article re “Text of Detroit Mayor Dave Bing's Financial Crisis Speech”	Hearsay, Relevance, Speculation	
4137	Bing Ex. 7 - Letter from Coit Cook Ford re Draft Proposal for Cumulative Monetization of the Cultural Assets	Hearsay, Foundation, Speculation	
4138	Bing Ex. 8 - 7/10/2013 Email from Kriss Andrews re Emergency Management	Hearsay, Relevance, Foundation	
4139	Bing Ex. 9 - 7/7/2013 Email to Dave Bing and Kriss Andrews re Syncora Status	Hearsay, Foundation	
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Ex. No.	Exhibit Description	City Objection	Retiree Objection
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4180	Orr Ex. 20 - City of Detroit's Amended Identification of Witnesses 30(b)(6)	No Objection	
4181	Orr Ex. 21 - Offering Circular of Taxable Certificates Series 2005	No Objection. Stipulated	
4182	Orr Ex. 22 - Transcript of Kevyn Orr's Speech at University of Michigan	No Objection	
4183	Orr Ex. 23 - 5/28/2013 Email from Bill Nowling re Thoughts on DIA	Hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4184	Orr Ex. 24 - Memorandum from Coit Cook Ford III re Draft Proposal for Cumulative Monetization of the Cultural Assets	Hearsay, Foundation, Speculation	
4185	Orr Ex. 25 - 10/17/2013 Email from Kevyn Orr re Ron Weiser and DIA	Hearsay	
4186	Orr Ex. 26 - City of Detroit Restructuring Priorities	No Objection	
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4193	Penske Ex. 1 - Philadelphia Inquirer News Article re “Roger Penske Parlays Winning Races Into Success on the Business Circuit”	Relevance, Hearsay, Foundation	
4194	Penske Ex. 2 - Car and Driver News Article re “What I'd Do Differently: Roger Penske”	Relevance, Hearsay, Foundation	
4195			
4196	Penske Ex. 4 - Detroit Free Press News Article re “Tom Walsh: Roger Penske's Views on Detroit's Bankruptcy”	Relevance, Hearsay, Foundation	
4197	Sallee Ex. 1 - Plante Moran Report re City of Detroit Assessing Division-Observations and Opportunities	Hearsay	
4198	Sallee Ex. 2 - The Detroit News Article re “Detroit’s Property Tax System Plagued by Mistakes, Waste”	Speculation, Hearsay, Foundation	
4199	Sallee Ex. 3 - Property Tax Process Review	Hearsay	
4200			
4201	Sallee Ex. 5 - The Videotaped Deposition of Gary Evanko	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4202	Sallee Ex. 6 - Detroit City Government Revenues	No Objection	
4203	Sallee Ex. 7 - MLive News Article re “Detroit Named a Top “Turnaround Town” for Residential Real Estate”	Hearsay, Foundation, Speculation	
4204	Sallee Ex. 8 - Detroit: Facts of Bankruptcy and Transformation	Hearsay	
4205	Sallee Ex. 9 - Crain’s Detroit Business News Article re “Will Detroit Land Bank Auction Build Value for Housing?”	Speculation, Hearsay, Foundation	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4206	Sallee Ex. 10 - BLS Data Viewer re Local Area Unemployment Statistics	Hearsay	
4207	Sallee Ex. 11 - S&P/Case-Shiller Detroit Home Price Index	Hearsay	
4208	Sallee Ex. 12 - S&P/Case-Shiller Detroit Home Price Index Historical Performance from 2004-2013	Hearsay	
4209	Sallee Ex. 13 - Plante Moran Report re City of Detroit Assessing Division Operational Recommendations	Hearsay	
4210	Sallee Ex. 15 - City and Metro Population-Data from Brookings Report	No Objection	
4211	Sallee Ex. 16 - City of Detroit Ten-Year Financial Projections	No Objection	
4212			
4213	Sallee Ex. 18 - City of Detroit Ten-Year Financial Projections Spreadsheets	No Objection	
4214	Sallee Ex. 19 - City of Detroit State Tax Commission Spreadsheet	Hearsay	
4215	Sallee Ex. 20 - Michigan Association of Realtor Data Spreadsheet	No Objection	
4216	Sallee Ex. 21 - Taxable Value Property Spreadsheet	No Objection	
4217	Sallee Ex. 22 - Annual; Privately-Owned Residential Building Permits, Wayne County, MI Census, Building Permits Survey Spreadsheet	No Objection	
4218	Sallee Ex. 23 - Home Price Index for Detroit, Michigan	No Objection	
4219	Sallee Ex. 24 - Changes to Detroit Property Tax Forecasts	No Objection.	
4220	Sallee Ex. 25 - Residential Sales Statistics	No Objection	
4221	Sallee Ex. 26 - Monthly New Privately-Owned Residential Building Permits: Wayne County, Michigan	Hearsay	
4222			
4223	Sallee Ex. 28 - MLive News Article re “How Michigan’s Revenue Sharing “Raid” Cost Communities Billions for Local Services”	Speculation, Hearsay, Foundation	
4224	Sallee Ex. 29 - Article by Anthony Minghine re “The Great Revenue Sharing Heist”	Speculation, Hearsay, Foundation	
4225			
4226	Sallee Ex. 31 - FRED Home Price Index for Detroit, Michigan	Hearsay	
4227	Sallee Ex. 32 - Property Tax Collection, by Class	No Objection	
4228	Sallee Ex. 33 - Estimating Methodology: Detroit Tax Forecast	Hearsay, Foundation	
4229	Sallee Ex. 34 - Long-term Projections Discussion Items	Hearsay, Foundation	
4230			

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4231			
4232	Craig Ex. 1 - Hearing re Eligibility Trial	Improper Exhibit; All Objections Made During Testimony; Hearsay	
4233			
4234	Craig Ex. 3 - 4/22/2013 Letter from Vanessa Mendoza re Manhattan Institute/Bratton Group Proposed Engagement in Detroit	Hearsay, Relevance	
4235	Craig Ex. 4 - 7/28/2013 Memorandum from The Bratton Group Team re Draft Recommendations	Hearsay	
4236	Craig Ex. 5 - 8/29/2013 Email from Chris Gannon re Detroit Project Additions	Hearsay, Relevance	
4237	Craig Ex. 6 - 9/11/2013 Email from Pat Hamett re Revised Draft of Strategic Implementation Plan	Hearsay	
4238			
4239	Craig Ex. 8 - Percent of Offenses Cleared by Arrest or Exceptional Means by Population Group	Incomplete document; hearsay	
4240			
4241	Craig Ex. 10 - Fox News Article re "Detroit EM Cuts Retirees' Health Benefits"	Relevance, Hearsay, Foundation	
4242	Craig Ex. 11 - 2/25/2014 Email from Gary Brown re DPD Overtime Report	Hearsay	
4243	Craig Ex. 12 - 4/2/2014 Email from John Hill re Budget Amendment	Hearsay, Relevance	
4244	Craig Ex. 13 - Detroit Free Press News Article re "Detroit Retirees Get Feb. Extension on Health Care"	Relevance, Hearsay, Foundation	
4245	Craig Ex. 14 - CNN News Article re "Detroit Bankruptcy Plan Proposes Slashing Pension Benefits up to 34%"	Relevance, Hearsay, Foundation	
4246			
4247	Mays Ex. 2 - 7/29/2013 Email from Sonya Mays to Kennis Wooten re City Airport	Hearsay	
4248	Mays Ex. 3 - 8/7/2013 Email from Kevyn Orr to Shani Penn and Sonya Mays re Conway MacKenzie	No Objection	
4249	Mays Ex. 4 - 8/9/2013 Email from Sonya Mays re Conway MacKenzie's Lack of Resources	No Objection	
4250	Mays Ex. 5 - 8/9/2013 Email from Sonya Mays to Charles Moore re Conway MacKenzie's Role at DWSD	No Objection	
4251	Mays Ex. 6 - 8/18/2013 Email from Sonya Mays re Detroit Free Press Newspaper Article by Rochelle Riley	No Objection	
4252	Mays Ex. 7 - 8/12/2013 Email from Kevin Hand re Fire Restructuring	No Objection	
4253			

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4254	Penn Ex. 2 - 7/29/2013 Email from Sonya Mays to Kennis Wooten re City Airport	No Objection	
4255	Penn Ex. 3 - 8/7/2013 Email from Kevyn Orr to Shani Penn and Sonya Mays re Conway MacKenzie	No Objection	
4256	Penn Ex. 4 - 8/9/2013 Email from Sonya Mays re Conway MacKenzie's Lack of Resources	No Objection	
4257	Penn Ex. 5 - 8/9/2013 Email from Sonya Mays to Charles Moore re Conway MacKenzie's Role at DWSD	No Objection	
4258	Penn Ex. 6 - 8/12/2013 Email from Kevin Hand re Fire Restructuring	No Objection	
4259	Penn Ex. 7 - 8/18/2013 Email from Sonya Mays re Detroit Free Press Newspaper Article by Rochelle Riley	No Objection	
4260	Penn Ex. 8 - Detroit Free Press News Article re Rochelle Riley: Detroit's Firefighters to get Help They Need Under Plan Taking Shape	Relevance, Hearsay, Foundation	
4261	Perry Ex. 2 - 11/4/2013 Letter to Evan Miller re Recommended Investment Return Assumption as of June 30, 2013 for DGRS	No Objection	
4262	Perry Ex. 3 - 11/4/2013 Letter to Evan Miller re Recommended Investment Return Assumption as of June 30, 2013 for DPFRS	No Objection	
4263	Perry Ex. 4 - Milliman 2012 Public Pension Funding Study	No Objection	
4264	Perry Ex. 5 - Milliman 2013 Public Pension Funding Study	No Objection	
4265	Perry Ex. 6 - NASRA Issue Brief: Public Pension Plan Investment Return Assumptions	Hearsay	
4266	Perry Ex. 7 - DGRS Expected Return Model; Assumptions as of June 30, 2012	No Objection	
4267	Perry Ex. 8 - DPFRS Expected Return Model; Assumptions as of June 30, 2012	No Objection	
4268	Perry Ex. 9 - Public Fund Survey Actuarial Assumptions	Hearsay; Duplicative of Syncora Ex. 4268	
4269	Perry Ex. 10 - California State Teachers' Retirement System-Experience Analysis from July 1, 2006-June 30, 2010	Relevance, Hearsay	
4270	Perry Ex. 11 - Oregon Public Employees Retirement System 2012 Experience Study	Relevance, Hearsay	
4271	Perry Ex. 12 - General Retirement System vs. Police and Fire Retirement System from 1989-2013	No Objection	
4272	Perry Ex. 13 - 5/5/2014 Letter to Evan Miller re DGRS Individual Claim Allocation as of June 30, 2013	No Objection	
4273	Perry Ex. 14 - 5/5/2014 Letter to Evan Miller re DPFRS Individual Claim Allocation as of June 30,	No Objection	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
	2013		
4274	Jenkins Ex. 1 - 5/9/2013 Email from Kevin Hand re Restructuring Initiatives	No Objection	
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4276	Jenkins Ex. 3 - City of Detroit Finance Department-Purchasing Division	No Objection	
4277	Jenkins Ex. 4 - Professional Services Contract Between City of Detroit, Michigan and System Planning Corporation	No Objection	
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4285	Jenkins Ex. 12 - Fox News Article re "Report: Detroit EM Cuts Retirees' Health Benefits"	Relevance, Hearsay, Foundation, Duplicative	
4286	Jenkins Ex. 13 - Detroit Free Press News Article re "Detroit Retirees Get Feb. Extension on Health Care"	Relevance, Hearsay, Foundation, Duplicative	
4287	Jenkins Ex. 14 - CNN News Article re "Detroit Bankruptcy Plan Proposes Slashing Pension Benefits Up to 34%"	Relevance, Hearsay, Foundation, Duplicative	
4288	Jenkins Ex. 15 - Police and Fire Retirement System of the City of Detroit Proposed Asset Allocation Policy Targets-Alternative B	Hearsay	
4289	Jenkins Ex. 16 - General Retirement System vs. Police & Fire Retirement System From 1989-2013	No Objection	
4290	Rapson Ex. 1 - Subpoena to Testify at a Deposition on July 25, 2014 for Rip Rapson	No Objection	
4291	Rapson Ex. 2 - Missions and Values of the Kresge Foundation	Hearsay, Relevance	
4292	Rapson Ex. 3 - City's Third Amended List of Fact Witnesses	No Objection	
4293	Rapson Ex. 4 - City's Amended List of Fact Witnesses	No Objection	
4294			
4295	Jones Ex. 2 - 5/12/2014 Email from Thomas Stallworth re Bankruptcy Settlement	Hearsay, Relevance	
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4300	Kopacz Ex. 2 - Order Appointing Expert Witness	No Objection	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4301	Kopacz Ex. 3 - Documents Provided to Phoenix by the City or its Advisors	No Objection	
4302	Kopacz Ex. 4 - General Retirement System vs. Police & Fire Retirement System from 1989-2013	No Objection	
4303			
4304	Kopacz Ex. 6 - The Blinken Report: Strengthening the Security of Public Sector Defined Benefit Plans	Hearsay	
4305	Kopacz Ex. 7 - NCPERS on Rockefeller Report: Impractical, Off the Mark	Hearsay	
4306	Kopacz Ex. 8 - GASB Improves Pension Accounting and Financial Reporting Standards	Hearsay	
4307	Kopacz Ex. 9 - Financial Reporting for Pension Plans	No Objection	
4308			
4309	Kopacz Ex. 11 - Public Fund Survey Summary of Findings to FY 2008	Hearsay	
4310	Duggan Ex. 1 - Order No. 20: Restoring the Salary and Benefits of the Mayor	No Objection	
4311			
4312	Duggan Ex. 3 - Corrected Fifth Amended Plan	No Objection	
4313	Duggan Ex. 4 - Michigan Financial Review Commission Act: Act 181 of 2014	No Objection	
4314	Duggan Ex. 5 - Notice of Filing of Redlined Version of Corrected Fifth Amended Plan	No Objection	
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4316	Duggan Ex. 7 - Email from John Hill re Mayors Characterization of the Plan of Adjustment	Hearsay	
4317	Duggan Ex. 8 - 5/2/2014 Email from Mike Duggan re Letter from Mayor Duggan	No Objection	
4318	Duggan Ex. 9 - Detroit Free Press News Article re “Detroit Retirees get Feb. Extension of Health Care”	Hearsay/Relevance/Speculation	
4319	Duggan Ex. 10 - Triennial Executive Budget FY 2015 Through FY 2017	No Objection	
4320	Duggan Ex. 11 - Order No. 31: Order Supplementing Order No. 20	No Objection	
4321	Duggan Ex. 12 - The Detroit News Article re “Orr Gives Control of Detroit’s Water Department to Mayor”	Hearsay/Relevance/Speculation	
4322	Duggan Ex. 13 - The Detroit News Article re “Duggan Right Guy for City Water Job”	Hearsay/Relevance/Speculation	
4323	Gilbert Ex. 1 - Detroit Blight Removal Task Force Plan	No Objection	
4324			
4325	Bigelow Ex. 1 - General Retirement System vs. Police and Fire Retirement System from 1989-2013	No Objection	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4326	Bigelow Ex. 2 - General Retirement System of the City of Detroit Meeting Materials	No Objection	
4327			
4328	Niblock Ex. 2 - Crain's Detroit Business News Article re "New CIO Beth Niblock starts from scratch to overhaul Detroit's 'fundamentally broken' IT system"	Hearsay/Relevance/Speculation	
4329	Niblock Ex. 3 - Plante Moran Report re Proposal to Provide IT Assessment and Strategic Planning Services	Hearsay	
4330	Niblock Ex. 4 - Press Release re Mayor Duggan Recruits Nationally Recognized Chief Information Officer	Hearsay	
4331	Niblock Ex. 5 - Letter to Mike Duggan re Response to Plan of Adjustment Due Diligence Request	No Objection	
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Ex. No.	Exhibit Description	City Objection	Retiree Objection
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4374	Gary Evanko Deposition Transcript - June 24, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4375	Glen Bowen Deposition Transcript -June 30, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4376	Michael Hall Deposition Transcript - July 2, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4377	Cynthia Thomas Deposition Transcript July 9, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4378	Marcell Todd Deposition Transcript - July 9, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4379	Robert Cline Deposition Transcript - July 14, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4380	Gaurav Malhotra Deposition Transcript - July 15, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4381	Kenneth Buckfire Deposition Transcript - July 16, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4382	City of Detroit Healthcare Design Discussion (1/16/13)	Hearsay	
4383	John Hill Deposition Transcript - July 18, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4384	Dave Bing Deposition Transcript - July 21, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4385	Marc Schwartz Deposition Transcript - July 21, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4386	Susan Mosey Deposition Transcript - July 21, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4387	Kevyn Orr Deposition Transcript - July 21, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4388	Kevyn Orr Deposition Transcript - July 22, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4389	Annmarie Erickson Deposition Transcript - July 22, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4390	Roger Penske Deposition Transcript - July 23, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4391	Charles Moore Deposition Transcript - July 23, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4392	Caroline Sallee Deposition Transcript - July 24, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4393	James Craig Deposition Transcript - July 24, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4394	Sonya Mays Deposition Transcript - July 24, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4395	Alan Perry Deposition Transcript - July 25, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4396	Edsel Jenkins Deposition Transcript - July 25, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4397	Shani Penn Deposition Transcript - July 25, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4398	Dan Gilbert Deposition Transcript - July 29, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4399	Ryan Bigelow Deposition Transcript - July 29, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4400	Beth Niblock Deposition Transcript - July 31, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4401	Marti Kopacz Deposition Transcript - July 31, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4402	Marti Kopacz Deposition Transcript - August 1, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4403	Rip Rapson Deposition Transcript - July 31, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4404	Mayor Michael Duggan Deposition Transcript - August 1, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4405	Michael Plummer Deposition Transcript - August 1, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4406	Brenda Jones Deposition Transcript - August 4, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4407	Brom Stibitz Deposition Transcript - August 4, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4408	Dennis Muchmore Deposition Transcript - August 4, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4409	Victor Wiener Deposition Transcript - August 4, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4410	Paul Provost Deposition Transcript - August 6, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4411	Graham Beal Deposition Transcript - August 7, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
4412	Expert Report of Glenn Meyers	Hearsay	
4413	Expert Report of Stephen Rosen	Hearsay	
4414	Expert Report of Elizabeth von Habsburg	Hearsay	
4415	Expert Report of Kevin Murphy	Hearsay	
4416	POA00002057 - MSU Detroit Revenue Forecast Memo (Oct. 2013)	No Objection	
4417	POA00002098 - Revenue Consensus Conference - Preliminary Report (Feb. 27, 2014)	No Objection	
4418	POA00005794 - Assessing Division - Observations and Opportunities (Plante Moran)	Hearsay	
4419	POA00011652 - Blocks Comprising Target Neighborhood	Foundation	
4420	POA00011653 - East English Village (AKA East Side 2)	Foundation	
4421	POA00013389 - City of Detroit Treasury Division Operational Recommendations (DRAFT)	Hearsay	
4422	POA00041063 - 4/26/13 K. Buckfire email re Suggested Economists part 1	Hearsay/Relevance	
4423	POA00066216 - 12/10/13 ConwayMacKenzie Letter to Lt. Gov. Calle	Hearsay	
4424	POA00107792 - MSU Staff Paper, Evaluating a Chapter 9 Bankruptcy for the City of Detroit: Reality Check or Turnaround Solution?	Hearsay/Foundation	
4425	POA00116525 - Ten Year Plan - Mayor Discussion Document (Feb. 11, 2014)	No Objection	
4426	POA00126409 - 1/23/14 J. Hill email re Mayor's Characterization of the Plan of Adjustment	Hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4427	POA00189683 - City of Detroit Treasury Division Operational Recommendations (DRAFT)	Hearsay	
4428	POA00252923 - Property Tax Process review, October 19, 2012, DRAFT	No Objection	
4429	POA00275656 - City and Metro population - data from Brookings report	Relevance/Hearsay	
4430	POA00537586 - 3/14/1414 Email from C. Polk to S. Fox re Revised FAB (and attachments)	Hearsay	
4431	POA00670854 - The Detroit Economic Forum January 2005, entitled Detroit Fiscal Challenges and Policy Options Financing City Services	Hearsay	
4432	POA00671654 - Diagnostic Synthesis Templates (Oct. 1, 2010)	No Objection	
4433	POA00706912 - 7/3/14 E&Y Letter re Plan of Adjustment 40 Year Projections	No Objection	
4434	*$100 million JP morgan Chase investment in Detroit to go toward fighting blight, building workforce*, spurring development, May 21, 2014 article from mlive.com	Hearsay/Relevance/Speculation	
4435	2/24/14 Detroit News, *Reverse Commute may hike tax bill*, 2014 WLNR 5072411	Hearsay/Relevance/Speculation	
4436	*An Elected Official's Guide to Revenue Forecasting*; Salomon A. Guarjardo and Rowan Miranda; Government Finance Officers Association, 2000	Hearsay/Relevance	
4437	*Bankruptcy Exit Plan Explores Collecting Taxes from Residents from Residents working Outside Detroit*, 2/24/14, from governing.com	Hearsay/Relevance/Speculation	
4438	Chicago Fed Letter, *Detroit's bankruptcy: The uncharter waters of Chapter 9*, by Gene Amromin and Ben Chabot, November 2013, number 316	Hearsay/Relevance/Speculation	
4439	Chicago Fed Letter, *What happens after Detroit's bankruptcy? Lessons in Reform*, by Richard H. Mattoon, January 2014, number 318a	Hearsay/Relevance/Speculation	
4440	*Detroit Emergency Manager Warns Against Bankruptcy,* Corey Williams, Associated Press, http://www.impomag.com/news/2013/03/detroit-emergency-manager-warns-against-bankruptcy?cmpid=related_content	Hearsay/Relevance/Speculation	
4441	*Detroit Facts on Bankruptcy and Transformation*, from Detroit Regional Chamber, Fall 2013	Hearsay/Relevance/Speculation	
4442	*Detroit: Myth vs. Reality*, from Detroitchamber.com	Hearsay/Relevance/Speculation	
4443	*Detroit's Financial Crisis, What you need to know*, from Detroitcantwait.com	Hearsay/Relevance/Speculation	
4444	*Detroit's Property tax system plagued by mistakes, waste*, from detroitnews.com, dated February 22, 2013	Hearsay/Relevance/Speculation	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4445	February 19, 2013 supplemental documentation of the Detroit Financial Review Team	No Objection	
4446	Financial Stability Agreement between the State of Michigan and the City of Detroit	No Objection	
4447	*Flashpoint 12/8/13: Detroit EM Kevyn Orrr; Detroit Emergency Manager Kevyn Orr discusses the city's future as he sees it,* http://www.clickondetroit.com/news/politics/flashpoint/flashpoint-12813-detroit-em-kevyn-orr/23382354	Hearsay/Relevance/Speculation	
4448	*Four Months after Bankruptcy, Michigan leaders reframe Detroit as America's comeback city*, from Forbes November 8, 2013	Hearsay/Relevance/Speculation	
4449	Frequently Asked Questions: City of Detroit Financial Stability Agreement, from Michigan State University	Hearsay/Relevance/Speculation	
4450	*Half of Detroit property owners don't pay taxes*, from detroitnews.com, dated feb. 21, 2013	Hearsay/Relevance/Speculation	
4451	*How Detroit Went broke: The answer may surprise you -- and don't blame Coleman Young*, from Detroit Free Press, September 15, 2013	Hearsay/Relevance/Speculation	
4452	*How Michigan's revenue sharing 'raid' cost communities billions for local services*, from mlive.com, March 30, 2014	Hearsay/Relevance/Speculation	
4453	*In turnaround, suburbs lose business to detroit after years of flight*, from mlive.com, May 31, 2013	Hearsay/Relevance/Speculation	
4454	*JP Morgan & Chase Co. Announces $100 million Commitment to Support Detroit's Economic Recovery*, from the Wall Street Journal, May 21, 2014	Hearsay/Relevance/Speculation	
4455	*JP Morgan Chase & Co., Invested in Detroit's Future*, pamplet from JP Morgan	Hearsay/Relevance/Speculation	
4456	*JP Morgan's investment gives legitimacy to Detroit's turnaround,* May 22, 2014 from detroitnews.com	Hearsay/Relevance/Speculation	
4457	Michigan Municipal League Revenue Sharing Fact Sheet, February 2014, mml.org	Hearsay/Relevance	
4458	Michigan's Sales and Use Taxes 2012, from the Tax Analysis Division, Office of Revenue and Tax Analysis, Michigan Department of Treasury, August 2013	No Objection	
4459	*Once-vacant Detroit Homes generate $1 million for City*, from michiganchronicleonline.com, July 9, 2014	Hearsay/Relevance/Speculation	
4460	*President Obama's Point man on Detroit financial crisis rolls up his sleeves, starts weekly visits*, Detroit Free Press, October 25, 2013	Hearsay/Relevance/Speculation	
4461	*Revenue Analysis and Forecasting*; Barry Blom and Salomon A. Guarjardo; Government Finance Finance Officers Association, 2001	Hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4462	*The great revenue sharing heist*, by Anthony Minghine	Hearsay/Relevance/Speculation	
4463	*Vacant Detroit Homes raise $1 million -- plus, find new life in city-run auctions*, from mlive.com, June 27, 2014	Hearsay/Relevance/Speculation	
4464	POA00700410 - City of Detroit General Fund - Budget to Actual Revenues and Expenditures Report	No Objection	
4465	POA00700416 - Office of the CFO - Project Tracking List	No Objection	
4466	CRC Report - Detroit City Government Revenues available at http://www.crcmich.org/PUBLICAT/2010s/2013/rpt382.pdf	Hearsay	
4467	POA00539338 - 4/2/14 J. Hill email re Budget Amendement	No Objection	
4468	POA00539411 - 3/29/2014 Hill email re DPD Promotions and Financial Impact	No Objection	
4469	POA00116252 - 12/6/2013 Fox email re AlixPartners document	No Objection	
4470	POA00126807 - 12/9/2013 J. Hill email re TransitionDetroit_Finance12022013vFinal	No Objection	
4471	POA00539257 - 3/19/2014 J. Hill email re office of the chief economist information	No Objection	
4472	POA00126820 - 11/23/2013 J. Hill email re City of Detroit CAFR	No Objection	
4473	POA00114947 - 11/27/2013 J. Naglick email re City of Detroit Risk Management Department	No Objection	
4474	POA00126822 - 11/23/2013 J. Hill email re Finance Org Chart	No Objection	
4475	POA00172013 - 12/4/2013 J. Naglick email re DWSD Opportunity United Water	No Objection	
4476	POA00640046 - 4/16/2014 Memorandum re Report on the Plan of Adjustment	No Objection	
4477	MLive News Article re “Detroit Named a Top “Turnaround Town” for Residential Real Estate”	Hearsay; Relevance; Speculation	
4478	City of Detroit 2012-2013 Executive Summary - Budget Overview	Incomplete document; foundation	
4479	IT Budget Information	Incomplete document; foundation	
4480	MLive News Article re “Detroit debt adjustment plan ‘hostile’ to bondholders"	Hearsay; Relevance; Speculation	
4481	Crains Detroit: Who cares if you don't file Detroit income taxes? Here's why maybe you should (shame alert)	Hearsay; Relevance; Speculation	
4482	Detroit Free Press, "New international bridge project in Detroit wins final permit from Coast	Hearsay; Relevance; Speculation	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
	Guard"		
4483	Delta Sky - Investing in Detroit's Roots	Hearsay; Relevance; Speculation	
4484	Delta Sky - In Conversation, Detroit Mayor Mike Duggan	Hearsay; Relevance; Speculation	
4485	Delta Sky - 5 Minutes with Rick Snyder	Hearsay; Relevance; Speculation	
4486	Some highlights from the most recent RSQE Michigan forecast, released on May 29, 2014	Hearsay, Foundation	
4487	POA00051110 - 11/29/2013 K. Hand email re Departmental Bulet points for Monday's Meeting with EMO	Hearsay	
4488	POA00245133 - Municipal Parking Diagnostic (Apr. 13, 2011)	Hearsay, Foundation	
4489	POA00057085 - 1/15/2014 email from C. Sekley re MPD--Initial Information Request	Hearsay	
4490	POA00010559 - 1/17/2014 Desman Letter re Proposal for Parking Planning Services	Hearsay	
4491	POA00015760 - Audit of the Municipal Parking Department July 2006-June 2008	No Objection	
4492	Crains Detroit: "Higher taxes helped Minn. economy outpace Michigan"	Hearsay; Relevance; Speculation	
4493	Mackinac Center: Detroit possibility of real privatization, savings	Hearsay; Relevance; Speculation	
4494	Economic Vitality Incentive Program Consolidation Plan (Previous Filer)	Foundation	
4495	City of Detroit - 2011-12 Cooperation, Collaboration and Consolidation Plan	Foundation	
4496	Detroitk12.org, Detroit Public Schools' Proposed Fiscal Year 2015 Budget, released today, focuses on advancing academic quality, stabilizing enrollment, extending successful programs and leveraging resources	Hearsay; Relevance; Speculation	
4497	Detroit Public Schools Emergency Manager Letter (June 20, 2013)	No Objection	
4498	Detroit Public Schools Emergency Manager Letter (Jan. 24, 2013)	No Objection	
4499	Detroitk12.org, Annual audit confirms second consecutive operating surplus, deficit reduction, improved audit findings and opinions for Detroit Public Schools	Hearsay; Speculation	
4500	Detroitk12.org, Michigan Department of Education Removes High Risk Designation from Detroit Schools	Hearsay; Speculation	
4501	DPS FY2015 Proposed Operating Budget	Foundation	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4502	State Policies Matter: How Minnesota's Tax, Spending and Social Policies Help it Achieve the Best Economy Among Great Lakes States	Hearsay; Relevance; Speculation	
4503	"Michigan Gov. Rick Snyder, Detroit EFM Kevyn Orr on Detroit Bankruptcy," July 19, 2013, available at http://www.youtube.com/watch?v=xtDJhdxCvtE	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4504	"Kevyn Orr Keynote - MPC 14," June 2, 2014, available at http://www.youtube.com/watch?v=8n4Uw5meyVk	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4505	"The Kevyn Orr Interview," June 23, 2014, available at http://www.youtube.com/watch?v=OriroZERKKk	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4506	"A Conversation with Kevyn Orr & Detroit Bankruptcy Update," June 26, 2014, available at http://www.youtube.com/watch?v=-34kZaVZ_Ps	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4507	"Interview with Kevyn Orr," December 5, 2013, available at http://www.youtube.com/watch?v=Rt27_pRA2g8	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4508	"Detroit EM Kevyn Orr on bankruptcy ruling," December 3, 2013 http://www.youtube.com/watch?v=oaiNtnRkUZs	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4509	"Flashpoint 3/16/14 -- Detroit EM Kevyn Orr," March 16, 2014, available at: http://www.clickondetroit.com/news/politics/flashpoint/Flashpoint-3-16-14-Detroit-EM-Kevyn-Orr/25006276	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4510	"Audio: Kevyn Orr press conference on plan of adjustment," available at http://www.freep.com/VideoNetwork/3237865931001/Audio-Kevyn-Orr-press-conference-on-plan-of-adjustment	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4511	"Questions Orr Anwers," January 7, 2014, available at https://www.youtube.com/watch?v=dt1LHIgXkAk&index=6&list=PLdiu-CBNRN7INKOfeLdfDT1GpgBNir0Um	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4512	"Kevyn Orr PT.3," March 14, 2014, available at https://www.youtube.com/watch?v=3Zx7TEGCeEE&index=9&list=PLdiu-CBNRN7INKOfeLdfDT1GpgBNir0Um	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4513	"Flashpoint 12/8/13: Detroit EM Kevyn Orr," December 8, 2013, available at http://www.clickondetroit.com/news/politics/flashpoint/flashpoint-12813-detroit-em-kevyn-orr/23382354	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4514	Brent Snavely, Detroit Reaches Tentative 5-Year Deal with 14 Unions in Bankruptcy Case, The Detroit Free Press (Apr. 28, 2014 8:37 PM, http://www.freep.com/article/20140428/NEWS01/304280084/Detroitbankruptcy-unions-deal	Hearsay; Speculation	
4515	Chad Holcom, Pension in play in Detroit bankruptcy: What's equitable, CRAIN'S DETROIT BUSINESS (Dec. 8, 2013, 8:00 AM)	Hearsay; Speculation	
4516	Chad Livengood and Michael H. Hodges, Investor groups prepare bids for DIA's treasurers but EM says city can't be forced to sell artwork under bankruptcy, THE DETROIT NEWS (April 9, 2014, 9:32 PM)	Hearsay; Speculation	
4517	Joe Guillen, Detroit council OKs transfer of 16,000 properties to city's land bank, DETROIT FREE PRESS (April 15, 2014, 6:10 PM)	Hearsay; Speculation	
4518	Joe Guillen, Detroit Red Wings' new stadium land transfer approved by City Council, DETROIT FREE PRESS (Feb. 4, 2014, 9:07 PM)	Hearsay; Speculation	
4519	Joe Guillen, Information technology: Upgrade needed for obsolete, inefficient systems, DETROIT FREE PRESS (June 16, 2013)	Hearsay; Speculation	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4520	Mark Stryker and John Gallagher, DIA's art collection could face sell-off to satisfy Detroit's creditors, DETROIT FREE PRESS (May 24, 2013, 1:53 PM)	Hearsay; Speculation	
4521	Melanie Hicken, Detroit pensions: Brides, a $5,000 poker chip and a big financial hole, CNNMONEY (Aug. 28, 2013, 6:10 AM)	Hearsay; Speculation	
4522	Nathan Bomey and John Gallagher, How Detroit went broke: The answers may surprise you - and don't blame Coleman Young, DETROIT FREE PRESS (Sept. 15, 2013, 1:10AM)	Hearsay; Speculation	
4523	Nathan Bomey, Kevyn Orr targeting pensions: Legal fight expected, DETROIT FREE PRESS (June 14, 2013, 1:53 PM)	Hearsay; Speculation	
4524	Pat Garofalo and Travis Waldron, If You Build It, They Might Not Come: The Risky Economics of Sports Stadiums, THE ATLANTIC (Sept. 7, 2012, 2:37 PM)	Hearsay; Speculation	
4525	Steve Yaccino, Kwame M. Kilpatrick, Former Detroit Mayor, Sentenced to 28 Years in Corruption Case, NEW YORK TIMES (Oct. 10, 2013)	Hearsay; Speculation	
4526	Three construction companies would become team that builds new Red Wings arena, CRAIN'S DETROIT BUSINESS (April 9, 2013, 4:59 PM)	Hearsay; Speculation	
4527	Am. Arbitration Ass'n et al., Model Standards of Conduct for Mediators (September 2005)	Relevance	
4528	C. Devitt, Kellogg Foundation Pledges $40M to Detroit's Pensions, Bond Buyer (Jan. 29, 2014 4:30 p.m. (ET)), http://www.bondbuyer.com/issues/123_19/kellogg-foundation-pledges-40m-to-detroits-pensions-1059364-1.html	Hearsay; Speculation	
4529	Detroit Bankruptcy & Beyond, Remarks of Rip Rapson, https://www.youtube.com/watch?v=z7nXphsL_QA (last visited Aug. 9, 2014)	Hearsay; Relevance; Speculation	
4530	Detroit Institute of Arts, Media Room: Board of Directors, www.dia.org/about/board-of-directors.aspx (last visited Aug. 9, 2014)	No Objection	
4531	E. Blair, Foundations Keep Detroit Art Off the Auction Block, NPR: All Things Considered (Jan. 13, 2014 4:00 p.m. (ET)), http://www.npr.org/2014/01/13/262185978/foundations -keep-detroit-art-off-the-auction-block	Hearsay; Speculation	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4532	GM News, GM and GM Foundation Lead Auto Sector Support of 'Grand Bargain' to Help Secure DIA Future (June 9, 2014), http://media.gm.com/media/us/en/gm/news.detail.html/content/Pages/news/us/en/2014/Jun/0609-dia.html	Hearsay; Speculation	
4533	Knight Blog, Proposed DIA Deal an Important Step for Detroit's Future (Jan. 14, 2014, 9:48 a.m. (ET)) http://www.knightfoundation.org/blogs/knightblog/2014/1/14/deal-detroits-future/	Hearsay; Speculation	
4534	Next Chapter Detroit, Detroit's Chief Mediator: Judge Gerald Rosen Speaks About the Bankruptcy Process, http://www.nextchapterdetroit.com/detroits-chief-mediator-judge-gerald-rosen-speaks-about-the-bankruptcy-process (last visited Aug. 9, 2014)	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4535	Update 1-Philanthropists Pledge Over $330 mln to Help Detroit Art Museum, Reuters (Jan. 13, 2014, 11:16 a.m. (ET)), http://www.reuters.com /article /2014/01/13/ usa-detroit-idUSL2N0KN14S20140113	Hearsay; Speculation	
4536	Ferreti, Christine, *DIA Hopes $26M Commitment from Detroit Automakers Fuels More Giving*, The Detroit News	Hearsay; Speculation	
4537	XL Capital Assurance Municipal Bond Insurance Policy CA02078A, dated June 2, 2005	No Objection; Stipulated	
4538	XL Capital Assurance Municipal Bond Insurance Policy CA02079A, dated June 2, 2005	No Objection	
4539	XL Capital Assurance Municipal Bond Insurance Policy CA03049A, dated June 12, 2006	No Objection; Stipulated	
4540	June 14, 2013 Proposal for Creditors	No Objection	
4541	Doc 11-8 from 13-53846, March 1, 2013 letter to Dave Bing and City Council from Rick Snyder	No Objection	
4542	Exhibit 10 from Malhotra 9/20/13 deposition	Hearsay, Foundation	
4543	BLS data viewer, local area unemployment statistics, LAUCT262200000000005	No Objection	
4544	Common Interest Agreement between the State of Michigan and the City of Detroit	No Objection	
4545	7/30/14 email from G. Shumaker re follow-up on Orr	Hearsay	
4546	6/4/2014 Irwin Email Re Christie's Report	Hearsay	
4547	5/14/2014 Irwin Emails Re Interrogatories	Hearsay	
4548	1/13/2014 *Detroit Auto Show 'Super' Boost for Ailing City* by Jeff Karoub AP	Hearsay; Relevance; Speculation	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4549	July 2014 CRC Memorandum: Statewide Ballot Issues Proposal 2014-1	Hearsay; Relevance; Speculation	
4550	Rosen Press Conference Transcript	Hearsay	
4551	Snyder Press Conference Transcript	Hearsay	
4552	DWSD Water Fund Financial Statement 2006	No Objection	
4553	DWSD Water Fund Financial Statement 2007	No Objection	
4554	DWSD Water Fund Financial Statement 2008	No Objection	
4555	DWSD Water Fund Financial Statement 2009	No Objection	
4556	DWSD Water Fund Financial Statement 2010	No Objection	
4557	DWSD Water Fund Financial Statement 2011	No Objection	
4558	DWSD Water Fund Financial Statement 2012	No Objection	
4559	DWSD Water Fund Financial Statement 2013	No Objection	
4560	DWSD Sewage Fund Financial Statement 2006	No Objection	
4561	DWSD Sewage Fund Financial Statement 2007	No Objection	
4562	DWSD Sewage Fund Financial Statement 2008	No Objection	
4563	DWSD Sewage Fund Financial Statement 2009	No Objection	
4564	DWSD Sewage Fund Financial Statement 2010	No Objection	
4565	DWSD Sewage Fund Financial Statement 2011	No Objection	
4566	DWSD Sewage Fund Financial Statement 2012	No Objection	
4567	DWSD Sewage Fund Financial Statement 2013	No Objection	
4568	Ernst & Young Amendment No. 7 to Statement of work, dated 7/17/13	No Objection	
4569			
4570	DTMI00107294 - 7/5/13 email from Erin Smith	Internal Hearsay; Relevance; Speculation	
4571	DTMI00111238 - 7/5/13 email from Bill Nowling	No Objection	
4572	DTMI00112208 - Abernathy MacGregor Invoice	Relevance	
4573	List of Detroit's Museums	Relevance/Hearsay	
4574	Charles Wright Museum Tax Form 990	Relevance; Foundation	
4575	Cranbrook 2011 Tax Form 990	Relevance; Foundation	
4576	Detroit Zoo Form 990	Relevance; Foundation	
4577	Detroit Historical Museum 990	Relevance; Foundation	
4578	Ford Tax Form 990	Relevance; Foundation	
4579	Original Plan (w/Exhibits) 2708	No Objection	
4580	Original Disclosure Statement (w/Exhibits) 2709	No Objection	
4581	Amended Plan (w/Exhibits) 3380	No Objection	
4582	Amended Disclosure Statement (w/Exhibits) 3382	No Objection	
4583	Second Amended Plan (w/Exhibits) 4140	No Objection	
4584	Second Amended Disclosure Statement (w/Exhibits) 4141	No Objection	
4585	Third Amended Plan (w/Exhibits) 4271	No Objection	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4586	Third Amended Disclosure Statement (w/Exhibits) 4272	No Objection	
4587	Fourth Amended Plan (w/Exhibits) 4391	No Objection	
4588	Fourth Amended Disclosure Statement	No Objection	
4589	Universal Work Rules	No Objection	
4590	D. Woodham (Christie's) letter to K. Orr (12/17/13)	Duplicative of 4360.	
4591	POA00170302 Email thread (8/6/13) between Sonya Mays and Shani Penn re proposals	No Objection	
4592	POA00169723 Email (8/9/13) Mays to Penn and Orr re Retention of Expert Related to DWDS	No Objection	
4593	POA00164568: Email (8/2/13) Pulte to Orr re 11 Changes Required for Effective Blight Elimination	Hearsay	
4594	DTMI00128731 Jones Day Presentation to City of Detroit (1/29/13)	Relevance	
4595	POA00035728 Email (6/4/13) Orr to Nowling (cc: Penn) re DIA	No Objection	
4596	POA00172802 Memo (7/10/13) Kinkead and Alcock to Orr re: Detroit Future City Framework and Support for City Restructuring Efforts	Hearsay; Speculation; Relevance	
4597	POA00539563 Email (3/8/14) Buckfire to Nowling and Orr re WSJ Editorial Today	Relevance	
4598	POA00539411 Email (3/29/14) Hill to Polk and Orr re DPD Promos and Financial Impact	No Objection	
4599	POA00539338 Email (4/2/14) Hill to Orr and Naglick and Scales re Budget Amendment	No Objection	
4600	City Employment Terms of Non-Uniform Employees (7/12/12)	No Objection	
4601			
4602	Master Agreement between City of Detroit and Michigan Council 25, 2014-2018 (Draft 5/21/14)	No Objection	
4603	Master Agreement between City and Fire Fighters Association 2009-2013 (Draft 7/16/12)	No Objection	
4604	Master Agreement between City and Michigan Council 25 7/1/08-6/30/12 (Draft 6/22/11)	No Objection	
4605	Master Agreement between City and Police Officers Association 2009-2012	No Objection	
4606	"What Kevyn Orr told his mother when she asked why he has to cut Detroit pensions" [Article - mlive, 3/26/14]	Hearsay; Speculation; Relevance	
4607	Detroit bankruptcy's bedrock dispute: Kevyn Orr talks tough as pensions cry foul" [Article - Detr. Free P. 3/2/14]	Hearsay; Speculation; Relevance	
4608	Transcript of FlashPoint 3/16/14 Interview - Detroit EM Kevyn Orr	Relevance, Hearsay; Inadequate transcript	
4609	Transcript of FlashPoint 12/8/13 Interview - Detroit EM Kevyn Orr	Relevance, Hearsay; Inadequate transcript	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4610	"In Detroit Bankruptcy, Delay is Better Than Error" [Article, Manhattan Inst., 4/29/14]	Hearsay; Speculation; Relevance	
4611			
4612	"Kevyn Orr Speaks: A full transcription of remarks at the American Bankruptcy Institute" [Article, Next Chapter, 5/2/14]	Hearsay; Relevance	
4613	"Orr: Parking ticket hike demonstrates discipline, sends creditors a message" [Article, Crain's Detroit Bus., 4/16/14]	Hearsay; Speculation; Relevance	
4614	Email (undated) Nowling to "All" re Mark Styker [Detr. FP] DIA article	Hearsay; Relevance	
4615	Crain's List: Largest Tourist Attractions and Cultural Institutions	Hearsay; Foundation	
4616	Detroit Historical Society Winter 1014 Quarterly Guide	Hearsay; Relevance	
4617	11 U.S.C. § 502	No Objection	
4618	11 U.S.C. § 507	No Objection	
4619	11 U.S.C. § 522	No Objection	
4620	11 U.S.C. § 547	No Objection	
4621	11 U.S.C. § 901	No Objection	
4622	11 U.S.C. § 904	No Objection	
4623	11 U.S.C. § 942	No Objection	
4624	11 U.S.C. § 943	No Objection	
4625	11 U.S.C. § 1121	No Objection	
4626	11 U.S.C. § 1122	No Objection	
4627	11 U.S.C. § 1123	No Objection	
4628	11 U.S.C. § 1124	No Objection	
4629	11 U.S.C. § 1125	No Objection	
4630	11 U.S.C. § 1126	No Objection	
4631	11 U.S.C. § 1127	No Objection	
4632	11 U.S.C. § 1128	No Objection	
4633	11 U.S.C. § 1129	No Objection	
4634	MCL § 117.36a	No Objection	
4635	MCL § 141.164	No Objection	
4636	MCL § 141.1552	No Objection	
4637	MCL § 141.1565	No Objection	
4638	MCL § 141.2303	No Objection	
4639	MCL § 141.2509	No Objection	
4640	MCL § 141.2701	No Objection	
4641	MCL § 141.2705	No Objection	
4642	MCL § 566.31	No Objection	
4643	MCL § 566.34	No Objection	
4644	MCL § 566.35	No Objection	
4645	MCL § 600.6093	No Objection	
4646	MCL § 600.6097	No Objection	
4647	City Income Tax Act - Act 284 of 1964	No Objection	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4648	*A Growth Strategy for Post-Bankruptcy Detroit*, Brookings, July 19, 2013	Hearsay, Speculation, Foundation	
4649	BLS - Michigan Employment Data	Hearsay	
4650	BLS data viewer, local area unemployment statistics, LAUCT262200000000005 (with Excel)	Hearsay	
4651	Corrected Versions of Figs. 1 and 2 in Cline Report [Demonstrative]	Relevance, Hearsay	
4652	*Detroit's New CFO Jim Bonsall Brings Tough Management Style to Motor City,*Detroit Free Press, July 23, 2013	Hearsay, Speculation, Foundation	
4653	*Editorial: Suburban Employers Should Withhold Taxes of Detroit Workers*, The Daily Tribune, December 11, 2011	Hearsay, Speculation, Foundation	
4654	Michigan.org Museum List	Hearsay	
4655	*Duggan Runs on Record*, The Michigan Citizen, March 7, 2013	Hearsay, Speculation, Foundation	
4656	*Mike Duggan interview: His top priorities if elected Detroit mayor*, Click on Detroit, November 1, 2013, available at, http://www.clickondetroit.com/news/Mike-Duggan-interview-His-top-priorities-if-elected-Detroit-mayor/22751354	Hearsay, Speculation, Foundation	
4657	*Charlie LeDuff interviews Detroit mayoral candidate Mike Duggan*, myfoxdetroit.com, September 23, 2013, available at http://www.myfoxdetroit.com/story/23507065/leduff-interview-with-mike-duggan	Hearsay, Speculation, Foundation	
4658	*Charlie LeDuff interviews Detroit mayoral candidate Mike Duggan*, myfoxdetroit.com, September 23, 2013	Hearsay, Speculation, Foundation	
4659	*The Mike Duggan Interview: 'I Expect To Raise Expectations',* Deadline Detroit Politics, November 11, 2012	Hearsay, Speculation, Foundation	
4660	*Mike Duggan Is Back.. But Will Detroit Voters Write In His Name For Mayor?,*HuffPost Detroit, June 28, 2013	Hearsay, Speculation, Foundation	
4661	*Napoleon Blasts Duggan, Snyder For Consulting Each Other About EM,* Deadline Detroit Politics, July 18, 2013	Hearsay, Speculation, Foundation	
4662	*Duggan: No guarantee Detroit's emergency manager is leaving in 18 months,* MLive, October 23, 2013	Hearsay, Speculation, Foundation	
4663	*Duggan vows to oppose an EM for Detroit, plans announcement this month,* Crain's Detroit Business, February 11, 2013	Hearsay, Speculation, Foundation	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4664	*Q&A with Mike Duggan: On EM for Detroit, Belle Isle, mayoral race,* Crain's Detroit Business, February 12, 2013	Hearsay, Speculation, Foundation	
4665	Atkinson Ex. 2 - City of Detroit Retiree Health Care Plan Actuarial Valuation Report	No Objection	
4666			
4667	Atkinson Ex. 4 - Actuarial Standards Board Selection of Economic Assumptions for Measuring Pension Obligations	No Objection	
4668	Taranto Ex. 2 - 7/6/2012 - Letter to Chris Brown re City of Detroit - Initial Assessment of Current Pension and Postretirement Health Situation	No Objection	
4669	Taranto Ex. 3 - 6/29/2013 Letter to Evan Miller re Replication of the Gabriel Roeder Smith & Company June 30, 201 1 Actuarial Valuation Report for the City of Detroit Retiree Health Care Plan	No Objection	
4670	Taranto Ex. 4 - Official Committee of Retirees Proof of Claim	No Objection	
4671	Howard Atkinson, Jr. Deposition Transcript - August 13, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All Objections in the transcript are incorporated by reference; hearsay	
4672	Stuart I. Wohl Deposition Transcript - August 13, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All Objections in the transcript are incorporated by reference; hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4673	Suzanne Taranto Deposition Transcript - August 13, 2014	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All Objections in the transcript are incorporated by reference; hearsay	
4674	Orr: Balance books, improvements follow, T*he Michigan Citizen*, March 13, 2014 *available at* http://michigancitizen.com/orr-balance-books-improvements-follow/	Hearsay, Speculation, Foundation	
4675	Interview w/Detroit EM Kevyn Orr Pt. 1 available at https://www.youtube.com/watch?v=1vOO4acpiK8&list=UU30rm_px6uyHnSEK35kGA0Q	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4676	Kevyn Orr PT.2 available at https://www.youtube.com/watch?v=6eSRuso7bUI&list=UU30rm_px6uyHnSEK35kGA0Q	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4677	Kevyn Orr PT.4 available at https://www.youtube.com/watch?v=NJ9lorbIfKk&list=UU30rm_px6uyHnSEK35kGA0Q	Foundation, Hearsay, Speculation, Relevance. Need to know which part of video is being listed.	
4678	United States Department of Commerce, Bureau of the Census, American Housing Survey, Selected Economic Characteristics, 2012 American Community Survey 1-Year Estimates, Detroit city, Michigan.	Hearsay	
4679	United States Department of Commerce, Bureau of the Census, American Housing Survey, Selected Housing Characteristics, 2012 American Community Survey 1-Year Estimates, Detroit city, Michigan.	Hearsay	
4680	United States Department of Labor, Bureau of Labor Statistics Unemployment Data	Hearsay	
4681	United States Department of Labor, Bureau of Labor Statistics, Labor Force Statistics from the Current Population Survey, Series LNS12000000, Seasonally Adjusted [National] Employment Level	Hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4682	United States Department of Labor, Bureau of Labor Statistics, Union Member New Release, January 24, 2014	Hearsay	
4683	United States Department of Labor, Bureau of Labor and Statistics, "Occupational Employment and Wages in Detroit-Livonia-Dearborn, Mich. Metropolitan Division - May 2012," News Release 13-757-CHI, May 17, 2013.	Hearsay	
4684	United States Department of Labor, Bureau of Labor Statistics, "Consumer Expenditures in 2012," Report 1046, March 2014.	Hearsay	
4685	United States Department of Commerce, Bureau of Economic Analysis, Real GDP for the Detroit-Warren-Dearborn Metropolitan Area,	Hearsay	
4686	State of California, Reference Book Information "Relating to Real Estate Practice, Licensing and Examinations," 2010	Hearsay, Relevance	
4687	S&P/Case-Shiller, Detroit Home Price Index	Hearsay	
4688	United States Department of Commerce, Bureau of the Census, "2011 US Census,"	Hearsay, Relevance	
4689	United States Department of Commerce, Bureau of the Census, "2000-2009 Population Data,"	Hearsay, Relevance	
4690	United States Department of Commerce, Bureau of the Census, State and Local Government Finances	Hearsay, Relevance	
4691	United States Department of Commerce, Bureau of the Census, Time Series Trends/Charts	Hearsay, Relevance	
4692	City and County of Denver Tax Guide - OPT Head Tax	Hearsay, Relevance	
4693	City of Detroit - Income Tax Revenue Projections (COD-SETT-00533-00534)	Foundation, Hearsay	
4694	City of Detroit, State Equalized Valuations	Hearsay, Foundation	
4695	City of Detroit, Zip Codes (map)	Relevance	
4696	Instructions for Completing 2014 City of Newark Payroll Tax Form	Hearsay, Relevance	
4697	City of Philadelphia Wage Tax Overview	Hearsay, Relevance	
4698	Cleveland CCA Division Of Taxation - Tax Rates 2014	Hearsay, Relevance	
4699	Lavelle, Martin and Emmanuel Ogbonna, "Comparing Detroit's Commuting Patterns with Other Cities'," Federal Reserve Bank of Chicago, December 4, 2013	Hearsay, Speculation, Foundation	
4700	Michigan Department of Treasury, "Constitutional and EVIP Revenue Sharing FY2013 Actual and FY2014 Projected - May Consensus"	No Objection	
4701	Michigan Department of Treasury, "Constitutional and EVIP Revenue Sharing FY2014 and FY2015 Projected - Executive Budget Recommendation"	No Objection	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4702	United States Department of Commerce, Bureau of the Census, Detroit Quick Facts	No Objection	
4703	Detroit-Livonia-Dearborn, MI Metropolitan Division - May 2012 OES Metropolitan and Nonmetropolitan Area Occupational Employment and Wage Estimates	Hearsay	
4704	Fogarty, Mark, Detroit's Housing Turnaround Finally Gets Off the Ground, National Mortgage News. October 11, 2013.	Hearsay, Speculation, Foundation	
4705	Gandhi, Natwar M., "Tax Rates and Tax Burdens in the District of Columbia – A Nationwide Comparison 2012," Government of the District of Columbia, December 2013	Hearsay, Speculation, Foundation	
4706	Pyndyck, Robert S. and Daniel L. Rubenfeld, "Econometric Models and Economic Forecasts," Fourth Edition, Boston: Irwin McGraw-Hill, 1998 (Pages 521-546)	Hearsay, Speculation, Foundation	
4707	EisnerAmper Blog - City of Newark, NJ Payroll Tax Amnesty In Effect Until December 30, 2011	Hearsay, Speculation, Foundation, Relevance	
4708	Frequently Asked Questions (FAQs) - Resource Center - LouisvilleKy	Hearsay, Speculation, Foundation, Relevance	
4709	Kansas City, MO Finance Department - Individual Taxpayer FAQ	Hearsay, Speculation, Foundation, Relevance	
4710	Michigan State Senate Fiscal Agency, "Michigan and U.S. Population 1970-2012"	Hearsay, Relevance	
4711	United States Department of Commerce, Bureau of the Census, "1990-1999 Population Data"	Hearsay, Relevance	
4712	United States Department of Commerce, Bureau of the Census, "2010-2013 Population Data"	Hearsay, Relevance; Need to format comma delimited text file so it is readable	
4713	Michigan Tax Tribunal, Department of Licensing and Regulatory Affairs, 211.27a	No Objection	
4714	Carlton, Dennis, "The Location and Employment Choices of New Firms: An Econometric Model with Discrete and Continuous Endogenous Variables," The Review of Economics and Statistics, August 1983.	Hearsay, Relevance	
4715	Mlive.com, "Detroit to Reduce Tax Assessments to Encourage Home Ownership," January 27, 2014	Hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4716	National Bureau of Economic Research "US Business Cycle Expansions and Contractions"	Hearsay, Relevance	
4717	New Jersey State Tax Information - Payroll Witholding Guide	Hearsay, Relevance	
4718	POA00178801 - Property Tax Collection, by Class 2007-2011	No Objection	
4719	POA00725654 - Figure 1. Total Taxable Value for City of Detroit, FY 2012- FY 2015	No Objection	
4720	Mutikani, Lucia, "U.S. Recoups Jobs Lost in Recession as Economy Picks Up," Reuters, June 6, 2014	Hearsay, Relevance	
4721	Haas, Mark and Matthew Knittel, "Revenue Forecasting in Michigan," Proceedings of the 90th Annual Conference on Taxation and Minutes of the Annual Meeting of the National Tax Association, November 1997, published Washington, D.C., 1998.	Hearsay, Relevance	
4722	San Francisco Business and Tax Regulations Code - Article 12-A Payroll Expense Tax Ordinance	Hearsay, Relevance	
4723	San Francisco Treasurer Payroll Expense Tax - 2013 Payroll Expense Tax Statement eFiling	Hearsay, Relevance	
4724	Michigan State Senate Fiscal Agency, Personal Property Tax Phase-Out, Bill Analysis, February 19, 2013	No Objection	
4725	St. Louis City Revenues	Hearsay, Relevance	
4726	U.S. Census Bureau - Table 448. Residential Property Tax Rates for Largest City in Each State: 2009	Hearsay, Relevance	
4727	Tax Facts - Income Tax Division, Columbus, Ohio	Hearsay, Relevance	
4728	Peters, Alan and Peter Fisher, "The Failure of Economic Development Incentives," Journal of the American Planning Association, Vol. 70, No. 27, 2004.	Hearsay, Relevance	
4729	Dye, Richard, Therese McGuire, and David Merriman, "The Impact of Property Taxes and Property Tax Classification on Business Activity in the Chicago Metropolitan Area," Lincoln Institute of Land Policy Working Paper, 1999.	Hearsay, Relevance	
4730	Mulkey, David and Alan W. Hodges, "Using IMPLAN to Assess Local Economic Impact"	Hearsay, Relevance	
4731	Wayne County, Department of Management and Budget, Assessment and Equalization Division, "2013 Apportionment and Equalization Report"	No Objection	
4732	POA00066383 - Gabriel Roeder PFRS Actuarial Valuation (2012)	No Objection	
4733	POA00081466 - DPD Compensation Analysis	No Objection	
4734	POA00144909 - White Book: 2013-2014 Salary and Wage Adjustments	No Objection	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4735	POA00223811 - Comparison of Detroit Police and Firefighter Wages	Foundation	
4736	POA00276200 - City of Detroit Salary/Wage Assumption	Foundation	
4737	POA00548401 - City of Detroit PPS Position Control - Position Status Summary (June 2013)	Foundation	
4738	POA00548637 - City of Detroit PPS Position Control - Position Status Summary (June 2004)	Foundation	
4739	POA00684247 - DPD Statistics	No Objection	
4740	POA00684303 - DPD Separations from 1/1/2013-4/16/2014	No Objection	
4741	Anderson, Kathryn H., Richard V. Burkauser, and Joseph F. Quinn, "Do Retirement Dreams Come True? The Effect of Unanticipated Events on Retirement Plans," 39(4) Industrial and Labor Relations Review 518 (July 1986).	Hearsay, Relevance	
4742	Becker, Gary S., "A Theory of the Allocation of Time" 75 Economic Journal (September 1965).	Hearsay, Relevance	
4743	Brown, Jeffrey R., Courtney C. Coile, and Scott J. Weisbenner, "The Effect of Inheritance Receipt on Retirement," 92(2) The Review of Economics and Statistics (May 2010), 425.	Hearsay, Relevance	
4744	Cesarini, David, Erik Lindqvist, Matthew J. Notowidigdo, and Robert Ostling, "The Effect of Wealth on Household Labor Supply: Evidence from Swedish Lotteries," Working Paper (July 2013).	Hearsay, Relevance	
4745	Ellman, Jeffrey B., and Daniel J. Merrett, "Pensions and Chapter 9: Can municipalities use bankruptcy to solve their pension woes?" 27 Emory Bankruptcy Developments Journal (2010), 365-413.	Hearsay, Relevance	
4746	Gregg, Lewis H., "Hours of Work and Hours of Leisure," Papers and Proceedings, Ninth Annual Meeting, IR Research Association (1956).	Hearsay, Relevance	
4747	Lazear, Edward P., "Agency, earnings profiles, productivity, and hours restrictions," 71(4) The American Economic Review (September 1981), 606-620.	Hearsay, Relevance	
4748	Munnell, Alicia H. and Laura Quinby, "Legal Constraints on Changes in State and Local Pensions," Center for Retirement Research (August 2012).	Hearsay, Relevance	
4749	"4-Year Deals for Unions at Verizon," New York Times, 9/19/2012.	Hearsay, Relevance	
4750	"Boeing Machinists' Plight Marks Changing Times for Labor," NPR, 1/15/2014	Hearsay, Relevance	Rule 403
4751	"Boeing Workers Approve 8-Year Contract Extension," New York Times, 1/4/2014	Hearsay, Relevance	Rule 403

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4752	"Case study: The Vallejo, California Bankruptcy," Standard and Poor's Ratings Direct, October 4, 2012	Hearsay, Relevance	Rule 403
4753	"Caterpillar Union Bows to Demands," Wall Street Journal, 8/17/2012	Hearsay, Relevance	
4754	"City of Detroit – Restructuring Plan (Executive Summary): Mayor's Implementation Progress Report", March 2013	No Objection	
4755	"Detroit Fire Dept. hiring 90 fire fighters," Fox Detroit, October 18, 2013	Hearsay, Relevance	
4756	"Detroit Institute of Arts applauds the inclusion of the Grand Bargain in the Emergency Manager's Plan of Adjustment," Detroit Institute of Arts, Press Release, February 21, 2014	Hearsay	
4757	"Detroit Manager Proposes Moving Retirees Off City's Health Care," MintPress News, 7/3/2013	Hearsay, Speculation	
4758	"Final Day to Apply for a Job as Detroit Firefighter," CBS Detroit, October 25, 2013	Hearsay, Speculation	
4759	"Foundations add $13 million to grand bargain pot for DIA, pensions," Detroit Free Press, June 11, 2014	Hearsay, Speculation	
4760	"In Rhode Island Bankruptcy, Bondholders Came First," Fox Business, 7/24/2013	Hearsay, Relevance	
4761	"Lockheed contract Wins Approval of Union Bargainers," New York Times, 6/25/2012.	Hearsay, Relevance	Rule 403
4762	"Lockheed Martin and Machinists Reach Agreement," New York Times, 6/24/2012	Hearsay, Relevance	Rule 403
4763	"Michigan House overwhelmingly approves $195 million in state aid for Detroit", Gary Detroit Free Press, July 15, 2014	Hearsay, Speculation	
4764	"More than 650 apply for 40 open Detroit police officer positions," MLive, August 19, 2013	Hearsay, Speculation	
4765	"Striking Caterpillar Workers Ratify Contract Offer," New York Times, 8/17/2012	Hearsay, Relevance	Rule 403
4766	"Survey Research Yields Data on Employee Turnover," National Business Research Institute	Hearsay, Relevance	
4767	"The State Role in Local Government Financial Distress," The Pew Charitable Trusts, July 2013	Hearsay, Relevance	
4768	"Turning Around an American Icon, How Ford went from Losing more than $30 billion to Posting Big Profits,"Cleveland.com, 1/29/2011	Hearsay, Relevance	Rule 403
4769	"UAW Agrees to Health Care Concession at Ford," New York Times, 2/24/2009	Hearsay, Relevance	Rule 403
4770	"UAW Says Ford Workers Ratified Concessions," Wall Street Journal, 3/10/2009	Hearsay, Relevance	Rule 403
4771	"United Machinists' Union Approves Pay Concessions," New York Times, 5/1/2003	Hearsay, Relevance	Rule 403

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4772	"When Is a 'General' Obligation Not a 'General Obligation Bond'?" Chapman Strategic Advisors, Municipal Bond Buyers Conference, February 2014	Hearsay, Relevance	
4773	Cory Eucalitto et al., "Municipal Bankruptcy: An Overview for Local Officials," State Budget Solutions (2/26/2013)	Hearsay, Relevance	
4774	Highlights of U.S. General Accounting Office, "Employer-Sponsored Benefits: Many Factors Affect the Treatment of Pension and Health Benefits in Chapter 11 Bankruptcy," GAO-07-1101 (September 2007)	Hearsay, Relevance	Rule 403
4775	John Bates Clark Medal Murphy Bio	Hearsay	
4776	PFRS June 30, 2011 Annual Actuarial Valuation	No Objection	
4777	PFRS June 30, 2012 Annual Actuarial Valuation	No Objection	
4778	PFRS June 30, 2013 Annual Actuarial Valuation	No Objection	
4779	GRS June 30, 2011 Annual Actuarial Valuation	No Objection	
4780	GRS June 30, 2012 Annual Actuarial Valuation	No Objection	
4781	GRS June 30, 2013 Annual Actuarial Valuation	No Objection	
4782	POA00259442 - Letter from Milliman to Evan Miller dated April 17, 2014 Re: DPFRS Actuarial Accrued Liability as of June 30, 2013	No Objection	
4783	POA00259964 - Letter from Milliman to Evan Miller dated April 23, 2014 Re: DPFRS Estimated Funded Status and Unfunded Liability in 2023 under a 55% COLA reduction scenario with a 6.75% investment return assumption and four scenarios combining specified Employer Contributions from 2014-2015 to 2022-2023 to and assumed market value of assets returns during 2013-2014	No Objection	
4784	POA00259901 - Letter from Milliman to Evan Miller dated April 25, 2014 Re: DGRS Estimated Employer Contributions Required in 2014-2015 to 2022-2023 to have 70% Funded Status in 2023 under an Annuity Savings Fund recoupment (20% cap) and 4.5% benefit reduction scenario with a 6.75% investment return assumption	No Objection	
4785	POA00259635 - Letter from Milliman to Evan Miller dated April 17, 2014 Re: Requested Supplemental Information for DGRS	No Objection	
4786	POA00259851 - Letter from Milliman to Evan Miller dated April 17, 2014 Re: Requested Supplemental Information for DPFRS	No Objection	
4787	POA00604157 - NASRA Issue Brief: Public Pension Plan Investment Return Assumptions, December 2013	Hearsay	

Ex. No.	Exhibit Description	City Objection	Retiree Objection
4788	"7.2 Square Miles - A Report on Greater Downtown Detroit" http://www.detroitsevenpointtwo.com/resources/sevenpointtwosquaremilesfullreport.pdf	Hearsay	
4789	"Mayor Mike Duggan, M1 Rail officials hail construction of Detroit's first streetcar in more than half a century" http://www.mlive.com/business/detroit/index.ssf/2014/07/mayor_mike_duggan_m1_rail_offi.html	Hearsay	
4790	"LaHood Cites Detroit's M1 Streetcar as Example of Partnership for Transit" http://urbanland.uli.org/news/lahood-cites-detroits-m1-streetcar-example-partnership-transit/	Hearsay	
	Any exhibit listed by any other party.		
	Any exhibit necessary for rebuttal.		

ATTACHMENT E

FINANCIAL GUARANTY INSURANCE COMPANY'S CONSOLIDATED (1) WITNESS LIST AND (2) EXHIBIT LIST

Financial Guaranty Insurance Company ("FGIC") hereby submits the following consolidated witness list and exhibit list for the September 2, 2014 hearing on the City's Plan of Adjustment:

I. Witness List

FGIC will call the following individuals as fact or expert witnesses, as noted below, as part of its case in chief or on rebuttal:

1. Stephen Spencer, Managing Director for Houlihan Lokey. Mr. Spencer will testify as an expert witness in this matter, and, as a fact witness, on his involvement in the process of obtaining indications of interest of the art collection housed at the DIA.

2. Victor Weiner, an appraiser and Director of Victor Wiener Associates, LLC. Mr. Weiner will testify as an expert witness in this matter, and, as a result, on his involvement in issuing an opinion regarding the value of art collection housed at DIA.

FGIC may call the following individuals as part of its case in chief or on rebuttal:

1. Annemarie Erickson (Fact)

2. Graham Beal (Fact)

In addition to and without waiving any and all reservations noted in this Pretrial Order, FGIC reserves the right to call any witness on any party's witness list. FGIC also notes that pursuant to that certain Stipulation By and Between the City of Detroit, Michigan and the COPs Creditors Regarding Certain Facts and the Admission of Certain Exhibits for the Confirmation Trial, dated July 13, 2014 [Docket No. 5984], FGIC agreed that it will not call upon Derek Donnelly, Seth Lehman, Irvin Corley, Jr., Sean Werdlow, Roger Short, and John Williams to testify at any evidentiary hearing on the Plan. On that basis, these individuals are not included on FGIC's witness list.

II. *Exhibit List*

FGIC submits the following exhibits for use at the hearing on the City's Plan of Adjustment. In addition to and without waiving any and all reservations noted in this Pretrial Order, FGIC reserves the right to supplement this list of exhibits. Specifically, FGIC is in the process of identifying additional documents for use at trial that were produced by the City in connection with the expert report of Michael J. Plummer within the following bates ranges: POA00735682-POA00738902, POA00738911-POA00741428, POA00741500-POA00745049. FGIC will supplement its trial exhibit list and work with the City to resolve objections, if any, to the use of these additional documents in advance of the final pre-trial conference on September 2, 2014. FGIC also reserves the right to use any exhibit listed by

any other party in this case. FGIC also reserves the right to supplement its objections to any party's exhibits.

The City disputes the reservations of rights contained in the foregoing paragraph.

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3000		Annual Report of the Board of Trustees of the GRS for the Year Ended June 30, 2004	Document is listed in Order Approving Stipulation [Dkt.6002]
3001		Annual Report of the Board of Trustees of the PFRS for the Year Ended June 30, 2004	Document is listed in Order Approving Stipulation [Dkt.6002].
3002	2/4/2005	City of Detroit Ordinance No. 03-05	Document is listed in Order Approving Stipulation [Dkt.6002].
3003	2/4/2005	City of Detroit Ordinance No. 04-05	Document is listed in Order Approving Stipulation [Dkt.6002].
3004	2/4/2005	City of Detroit Ordinance No. 05-05	Document is listed in Order Approving Stipulation [Dkt.6002].
3005	5/26/2009	City of Detroit Ordinance No. 05-09	Document is listed in Order Approving Stipulation [Dkt.6002].
3006	5/20/2005	GRS Service Corporation Articles of Incorporation	Document is listed in Order Approving Stipulation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
			[Dkt.6002].
3007	5/20/2005	PRFS Service Corporation Articles of Incorporation	Document is listed in Order Approving Stipulation [Dkt.6002].
3008	6/2/2005	2005 COPs Trust Agreement	Document is listed in Order Approving Stipulation [Dkt.6002].
3009	6/12/2006	2006 COPs Trust Agreement	Document is listed in Order Approving Stipulation [Dkt.6002].
3010	5/25/2005	GRS Service Contract 2005 by and between the City and the GRS Service Corporation	Document is listed in Order Approving Stipulation [Dkt.6002].
3011	5/25/2005	PFRS Service Contract 2005 by and between the City and the PFRS Service Corporation	Document is listed in Order Approving Stipulation [Dkt.6002].
3012	6/7/2006	GRS Service Contract 2006 by and between the City and the GRS Service Corporation	Document is listed in Order Approving Stipulation [Dkt.6002].
3013	6/7/2006	PFRS Service Contract 2006 by and between the City and the PFRS Service Corporation	Document is listed in Order Approving Stipulation [Dkt.6002].
3014	6/2/2005	Contract Administration Agreement 2005 among Detroit Retirement Systems Funding Trust 2005, the COP Service	Document is listed in Order Approving Stipulation [Dkt.6002].

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Corporations, U.S. Bank, National Association and other persons thereto	
3015	6/12/2006	Contract Administration Agreement 2006 among Detroit Retirement Systems Funding Trust 2006, the COP Service Corporations, U.S. Bank, National Association and other persons thereto	Document is listed in Order Approving Stipulation [Dkt.6002].
3016	6/2/2005	FGIC 2005 Municipal Bond New Issue Insurance Policy	Document is listed in Order Approving Stipulation [Dkt.6002].
3017	6/12/2006	FGIC 2006-A Municipal Bond New Issue Insurance Policy	Document is listed in Order Approving Stipulation [Dkt.6002].
3018	6/12/2006	FGIC 2006-B Municipal Bond New Issue Insurance Policy	Document is listed in Order Approving Stipulation [Dkt.6002].
3019	6/2/2005	Letter Agreement among the City, FGIC and XL Capital Assurance Inc.	Document is listed in Order Approving Stipulation [Dkt.6002].
3020	6/12/2006	Letter Agreement among the City, FGIC and XL Capital Assurance, Inc.	Document is listed in Order Approving Stipulation [Dkt.6002].
3021	5/25/2005	Offering Circular for the Series 2005 COPs	Document is listed in Order Approving Stipulation [Dkt.6002].

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3022	6/7/2006	Offering Circular for the Series 2006 COPs	Document is listed in Order Approving Stipulation [Dkt.6002].
3023	5/25/2005	Underwriting Agreement for the Series 2005 COPs	Document is listed in Order Approving Stipulation [Dkt.6002].
3024	6/7/2006	Underwriting Agreement for the Series 2006 COPs	Document is listed in Order Approving Stipulation [Dkt.6002].
3025	6/2/2005	GRS Certificate of Receipt	Document is listed in Order Approving Stipulation [Dkt.6002].
3026	6/2/2005	PFRS Certificate of Receipt	Document is listed in Order Approving Stipulation [Dkt.6002].
3027	6/11/2013	FGIC Rehabilitation Plan	Document is listed in Order Approving Stipulation [Dkt.6002].
3028	6/28/2012	FGIC Order of Rehabilitation	Document is listed in Order Approving Stipulation [Dkt.6002].
3029	8/19/2013	FGIC Notice of Effective Date and Initial CPP	Document is listed in Order Approving Stipulation [Dkt.6002].
3030	6/7/2001	FGIC Municipal Bond New Issue Insurance Policy Number 01010573	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3031	3/23/2005	FGIC Municipal Bond New Issue Insurance Policy Number 05010189	No Objection
3032	10/23/2001	FGIC Municipal Bond New Issue Insurance Policy Number 01012198	No Objection
3033	Feb-2013	Miller Buckfire Materials Prepared for Discussion Assessment of City Assets	No Objection
3034	10/2/2013	Miller Buckfire, Analysis of New Water/Sewer Authority	No Objection
3035	7/25/2014	Expert Witness Report of Stephen Spencer	Hearsay
3036	7/25/2014	Expert Witness Report of Victor Wiener	Hearsay
3037		Curriculum Vitae of Victor Wiener	Hearsay, Foundation
3038	5/28/2013	Email from B. Nowling to K. Orr re: Thoughts on DIA	Hearsay, Speculation
3039	2/14/2014	FGIC COPs Proofs of Claim (1195)	No Objection
3040	2/14/2014	FGIC COPs Proofs of Claim (1190)	No Objection
3041	2/19/2014	FGIC DWSD Bond Proofs of Claim (1191)	No Objection
3042	2/19/2014	FGIC DWSD Bond Proofs of Claim (1185)	No Objection
3043	5/26/2004	Resolutions Adopted by City Council Authorizing the Issuance and Sale of Certain LTGO Bonds on May 26, 2004	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3044	5/6/2005	Resolutions Adopted by City Council Authorizing the Issuance and Sale of Certain LTGO Bonds on May 6, 2005	No Objection
3045	11/17/2006	Resolutions Adopted by City Council Authorizing the Issuance and Sale of Certain LTGO Bonds on November 17, 2006	No Objection
3046	8/27/2004	Sale Orders Issued by Finance Director of the City dated August 27, 2004	No Objection
3047	6/24/2005	Sale Orders Issued by Finance Director of the City dated June 24, 2005	No Objection
3048	5/30/2008	Sale Orders Issued by Finance Director of the City dated May 30, 2008	No Objection
3049	8/27/2004	Official Statement for General Obligation Bonds	No Objection
3050	6/24/2005	Official Statement for General Obligation Bonds	No Objection
3051	5/30/2008	Official Statement for General Obligation Bonds	No Objection
3052	6/14/2013	City of Detroit Proposal for Creditors	No Objection
3053	7/16/2014	Forty-Year Financial Projections	No Objection
3054	10/17/2013	Email chain between Orr, Buckfire, Muchmore, and Weiser re: Ron Weiser Call	Hearsay, Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3055	5/12/2006	Public Finance Credit Application, Detroit Retirement System Funding Trust 2006 Pension Obligation Certificates of Participation	No Objection
3056	Oct-1919	DIA Bulletin Vol. 1, No. 1	No Objection
3057	Jan-1942	Annual Report of Arts Commission, DIA Bulletin Vol. 21, No. 5	No Objection
3058	7/11/2013	B. Snavely, 8 questions with Kenneth Buckfire, Detroit Free Press	Hearsay, Foundation
3059	1/4/1960	Arts Commission Minutes	No Objection
3060	7/30/1963	Arts Commission Minutes	No Objection
3061	7/1/1959	Arts Commission Minutes	No Objection
3062	8/27/1962	Arts Commission Minutes	No Objection
3063	12/12/1997	Operating Agreement	No Objection
3064		INTENTIONALLY LEFT BLANK	
3065	11/1/1968	Letter from IRS to DIA Corp.	No Objection
3066	2/24/1972	Internal Museum Memo	No Objection
3067		Detroit Institute of Arts Collections Management Policy	No Objection
3068	2012	A Legal Primer on Managing Museum Collections, Marie Malaro and Ildiko DeAngelis, 45-47, 150, 248-249 (3rd ed.)	Hearsay, Relevance, Foundation
3069	12/3/1998	Collections Management Policy	No Objection
3070	4/19/2006	Collections Management	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Policy	
3071	1918	1918 Charter of the City of Detroit	No Objection
3072	1/27/1919	Arts Commission Minutes	No Objection
3073	3/3/1919	Arts Commission Minutes	No Objection
3074	4/28/1919	Arts Commission Minutes	No Objection
3075	5/12/1919	Arts Commission Minutes	No Objection
3076	6/2/1919	Arts Commission Minutes	No Objection
3077	10/11/1919	Assignment of art from R. Henri to DIA	No Objection
3078	6/30/1919	Letter from DMA to Arts Commission	No Objection
3079	12/29/1919	Arts Commission Minutes	No Objection
3080	2/27/1905	Detroit Museum of Arts Articles of Association	No Objection
3081	1/27/1920	DMA Minutes	No Objection
3082	1/14/1920	Arts Commission Minutes	No Objection
3083	May-1977	Speech of F. Cummings, The State Steps In: Michigan and the Detroit Institute of Arts	No Objection
3084	Undated	Agenda for Meeting with Mayor Young	No Objection
3085	10/12/1983	The Detroit News, City's DIA Audit Finds No "Willful" Violations	Hearsay, Relevance, Foundation
3086	11/11/1983	The Detroit News, Key Changes Ordered in Art Museum Operation	Hearsay, Relevance, Foundation
3087	1984	Agreement between City and DIA Corp. Finance Dept. Contract No. 01261	No Objection
3088	10/31/1997	Arts Commission Minutes	No Objection
3089	10/13/1997	Memo re: Management Audit of proposed	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		management transfer from City to non-profit	
3090		Developing an Institutional Code of Ethics, http://www.aam-us.org/docs/continuum/developing-a-code-of-ethics-final.pdf?sfvrsn=2 (accessed 7/21/2014 at 8:26PM)	No Objection
3091		AAM Code of Ethics of Museums, adopted 1991, amended 2000, http://www.aam-us.org/resources/ethics-standards-and-best-practices/code-of-ethics	No Objection
3092	6/20/1989	DIA Corp. Minutes	No Objection
3093	1/2/1976	Recommendation of JMCC	No Objection
3094	2/13/1964	Arts Commission Minutes	No Objection
3095	2/25/1964	Arts Commission Minutes	No Objection
3096	2/5/1965	Arts Commission Minutes	No Objection
3097	3/17/1987	DIA Corp. Minutes	No Objection
3098	5/15/1989	City Council Minutes	No Objection
3099	Jun-1999	GASB Stmt No. 34, June 1999	No Objection
3100	4/9/2014	Memo from Saied Rouhani to Finance Accounts – File	No Objection
3101	Undated	Letter from Mayor Bing to County Commissioners	No Objection
3102	1/23/2013	Proposed Capital Agenda, FY 2013-14 through FY 2017-18	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3103	10/10/1985	Memo from Budget Director to All Department Heads, re: 1986-87 Budget Requests	No Objection
3104		Budget for Arts Agency, FY 1988-89	No Objection
3105		Budget for Arts Agency, FY 1989-90	No Objection
3106	4/28/1998	FY 1998-99 Budget Analysis by the Fiscal Analysis Division	No Objection
3107	4/27/2000	FY 2000-01 Budget Analysis by the Fiscal Analysis Division	No Objection
3108		Attorney General's Charitable Trust Section Database Search, OFFICE OF THE ATTORNEY GENERAL, http://www.ag.state.mi.us/ CharitableTrust/	Relevance, Hearsay
3109	11/24/1937	Arts Commission Minutes	No Objection
3110	6/10/1949	Arts Commission Minutes	No Objection
3111	12/4/1933	Arts Commission Minutes	No Objection
3112	1/25/1944	Arts Commission Minutes	No Objection
3113	10/25/1948	Arts Commission Minutes	No Objection
3114	4/25/1949	Arts Commission Minutes	No Objection
3115	4/17/1950	Arts Commission Minutes	No Objection
3116	11/27/1951	Arts Commission Minutes	No Objection
3117	11/16/1953	Arts Commission Minutes	No Objection
3118	Jan-1920	Annual Report of Arts Commission, DIA Bulletin Vol. 1, No. 4	No Objection.
3119	Feb-1921	Annual Report of Arts Commission, DIA	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Bulletin Vol. 21, No. 5	
3120	Feb-1928	Annual Report of Arts Commission, DIA Bulletin Vol. 9, No. 5	No Objection
3121	5/27/1927	DIA Corp. Minutes	No Objection
3122	2/28/2014	List of Major Works	Relevance, Hearsay, Foundation
3123		DIA Collection Spreadsheet	Relevance, Hearsay, Foundation
3124	1916	DMA Bulletin	No Objection
3125	6/30/1900	DMA Annual Rep. 1900	No Objection
3126	6/30/1912	DMA Annual Rep. 1912	No Objection
3127	4/3/1916	Letter from DIA to William Stevens and attachments	No Objection
3128	2/16/2011	The Detroit Institute of Arts Gift Acceptance and Recognition Policy	Relevance, Hearsay, Foundation
3129	1/9/1956	Arts Commission Minutes	No Objection
3130	4/15/1957	Arts Commission Minutes	No Objection
3131	11/11/1946	Arts Commission Minutes	No Objection
3132	1960	Form Deed of Gift, circa 1960's	No Objection
3133	12/21/1961	Deed of Gift of Artwork	No Objection
3134	10/20/1988	Form Deed of Gift from W. Hawkins Ferry	No Objection
3135	10/30/1918	Letter from Attorney to DIA Corp. Officer	No Objection
3136	10/9/1992	Letter re: Standard Deed of Gift Form	No Objection
3137	12/15/1994	Memo from A. Darr to S. Sachs, et al. re: Donation	No Objection
3138	7/16/1976	Last Will and Testament of Eleanor Clay Ford	No Objection
3139	12/28/1953	Deed of Gift from Alfred	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Fisher	
3140	4/15/1996	Letter from G. Keyes to A. Fisher	No Objection
3141	6/30/2003	DIA Corp. Financial Statement	No Objection
3142	12/15/1953	Arts Commission Minutes	No Objection
3143	4/30/1974	Arts Commission Minutes	No Objection
3144	7/24/1985	Arts Commission Minutes	No Objection
3145	1/14/1957	Arts Commission Minutes	No Objection
3146	11/7/1963	Arts Commission Minutes	No Objection
3147	1/27/1941	Arts Commission Minutes	No Objection
3148	6/25/1934	Arts Commission Minutes	No Objection
3149	9/24/1951	Arts Commission Minutes	No Objection
3150	1/14/1952	Arts Commission Minutes	No Objection
3151	5/13/1921	Acknowledgement of Gift	No Objection
3152	1/22/1925	Acknowledgement of Gift	No Objection
3153	9/25/1931	Acknowledgement of Gift from L. Haass and C. Haass	No Objection
3154	12/23/1947	Acknowledgement of Gift	No Objection
3155		INTENTIONALLY LEFT BLANK	
3156	10/29/1926	Acknowledgement of Gift	No Objection
3157	6/28/1989	Arts Commission Minutes	No Objection
3158	7/18/1931	Ralph Booth Probate Documents and Last Will and Testament	No Objection
3159	6/24/1969	Last Will and Testament of William Hawkins Ferry	No Objection
3160	5/13/1918	Last Will and Testament of Charles L. Freer	No Objection
3161	5/5/1953	Acknowlegment of Gift	No Objection
3162	2/14/1961	DIA Corp. Minutes	No Objection
3163	1998	Form, circa 1998, Approval of Funds	Relevance, Hearsay, Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Designated for Acquisition	
3164	4/21/1942	Letter from Mrs. Booth to Arts Commission re: collection	No Objection
3165	7/14/1931	Arts Commission Minutes	No Objection
3166	8/27/1991	Memo from Registrar re: Kamperman Gifts	No Objection
3167	1/26/1959	Arts Commission Minutes	No Objection
3168	1/21/1963	Arts Commission Minutes	No Objection
3169	8/9/2013	S. Vandeweerdt, K. Orr, Christie's Appraisal Agreement	Image is illegible
3170	8/1/2013	Email from K. Gray to B. Nowling et al., re Christie's Draft Statement	No Objection
3171	7/26/2013	Email from L. Layfer to A. Whiting et al., re Christie's/DIA	Hearsay
3172	11/19/2013	Email from V. Fusco to S. Vandeweerdt et al., re: DIA Appraisal Update	No Objection
3173	4/7/1969	Codicil of Robert Tannahill	No Objection
3174	8/27/1970	Tannahill Receipt and Commitment	No Objection
3175	3/10/1966	Last Will and Testament of Robert Tannahill	No Objection
3176	4/17/1885	Restated Articles of Incorporation, Founders Society Detroit Institute of Arts	No Objection
3177	8/24/2001	DIA Financial Statements	No Objection
3178	9/29/2004	DIA Financial Statements	No Objection
3179	10/3/2007	DIA Financial Statements	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3180	10/20/2010	DIA Financial Statements	No Objection
3181	10/31/2012	DIA Financial Statements	No Objection
3182	9/5/2006	DIA Corp. Financial Statement	No Objection
3183	6/30/2013	Financial Statements, Detroit Institute of Arts, year ended June 30, 2013, With Report of Independent Auditors	No Objection
3184	5/23/1932	Arts Commission Minutes	No Objection
3185	9/11/1944	Arts Commission Minutes	No Objection
3186	11/24/1948	Arts Commission Minutes	No Objection
3187		INTENTIONALLY LEFT BLANK	
3188	9/30/1955	Arts Commission Minutes	No Objection
3189	1/9/1961	Arts Commission Minutes	No Objection
3190	3/13/1961	Arts Commission Minutes	No Objection
3191	2/12/1962	Arts Commission Minutes	No Objection
3192	8/21/1962	Arts Commission Minutes	No Objection
3193	3/18/1964	Arts Commission Minutes	No Objection
3194	12/1/1964	Arts Commission Minutes	No Objection
3195	9/11/1972	Arts Commission Minutes	No Objection
3196	2/8/1973	Arts Commission Minutes	No Objection
3197	6/16/1975	Arts Commission Minutes	No Objection
3198	12/11/1975	Arts Commission Minutes	No Objection
3199	1/31/1984	Arts Commission Minutes	No Objection
3200	12/4/1987	Arts Commission Minutes	No Objection
3201	1/27/1988	Arts Commission Minutes	No Objection
3202	9/30/1992	Arts Commission Minutes	No Objection
3203	7/21/1994	Arts Commission Minutes	No Objection
3204	11/27/1914	DIA Meeting Minutes	No Objection
3205	6/15/1917	DIA Minutes	No Objection
3206	1/11/1918	DMA Minutes	No Objection
3207	2/18/1919	DMA Minutes	No Objection
3208	9/12/1919	DMA Meeting Minutes	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3209	6/17/1975	DIA Corp. Minutes	No Objection
3210	1/15/1992	DIA Corp. Minutes	No Objection
3211	12/10/1971	Arts Commission Minutes	No Objection
3212	5/29/1975	Letter from DIA Director	No Objection
3213	1/11/1995	Joint Museum Collections Committee Minutes	Hearsay
3214	12/18/1923	Letter from DIA Corp.	No Objection
3215	9/10/2009	Report, Objects from the Estate of W. Hawkins Ferry	Relevance, Hearsay, Foundation
3216	4/25/1988	Form Deed of Gift	No Objection
3217	undated	Excerpt from Will of Dollie May Fisher	Hearsay
3218	7/20/1987	Memo to Mayor from DIA Director	No Objection
3219	2/26/1973	Recommendations of Collection's Categories Review Committee	No Objection
3220	11/26/1997	Operating Agreement (noting date of City approval)	No Objection
3221	5/11/1966	Letter from DIA Corp. to Donor	No Objection
3222	1885 - 1945	Sixty Years in Review	No Objection
3223	Mar. 1941	Inventory of the Municipal Archives of Michigan	No Objection
3224	4/26/1988	Deaccession Form Contract	Unsigned Draft
3225	11/26/1971	Interrelationship of Arts Commission and Founders Society	No Objection
3226	7/1/1919	Letter from Arts Commission to DMA	No Objection
3227	5/2/1989	DIA Corp. Endowment	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Committee Minutes	
3228	6/9/1972	Notice of Hearing	No Objection
3229	undated	Charter Revision Commission Proposed Charter Reviews	Hearsay, Foundation
3230	3/1/1972	Letter to Arts Commission from DIA Director	No Objection
3231	11/27/1956	Audit Report, office of the Auditor General, for the period of 7/1/1955 to 6/30/1956	No Objection
3232	7/20/1983	Memo, History of State Funding of DIA, Chronology of City/State Funding of DIA	No Objection
3233	4/5/1932	Letter to Common Council from Arts Commission	No Objection
3234	1932	Letter to Common Council from Arts Commission	No Objection
3235	1/11/1932	Letter to Common Council from Arts Commission	No Objection
3236	4/11/1932	Letter to Arts Commission	No Objection
3237	1932	Arts Commission Public Statement	No Objection
3238	6/29/1933	Letter to DIA Director	No objection
3239	8/21/1983	DIA Chief Under Fire; Audit on, Detroit News	Hearsay, Relevance, Foundation
3240	11/6/1997	Agenda, DIA general museum staff meeting	Hearsay, Relevance, Foundation
3241	3/2/1995	Memo re: redline of revisions to Museum's Collections Management	Hearsay, Relevance, Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Policy	
3242	undated	Relationship Between Arts Commission and Founders Society	Hearsay, Relevance, Foundation
3243	undated	Statement of Over-all Arts Commission Policy	Hearsay, Relevance, Foundation
3244	2/28/1995	Letter from William Neal	Hearsay, Relevance, Foundation
3245	11/11/2011	Memorandum re: Draft Proposal For Cumulative Monetization of the Cultural Assets - the Detroit Institute of Arts, from Coit Cook Ford III, Senior Policy Advisor for the Office of Ken Cockrel, Jr., Detroit City Council	Hearsay, Relevance
3246	10/20/1902	DMA Annual Rep 1902	No Objection
3247	10/14/1907	DMA Annual Rep 1907	No Objection
3248	10/14/1910	DMA Annual Rep 1910	No Objection
3249	7/1/1911	DMA Annual Rep 1911	No Objection
3250	10/14/1913	DMA Annual Rep 1913	No Objection
3251	6/11/1915	DMA Annual Rep 1915	No Objection
3252	1/13/2014	Detroit Free Press $330 million pledged to save Detroit Pensions, art work	Hearsay, Relevance, Foundation
3253	1/13/2014	Los Angeles Times, Foundations pledge $330 million to preserve Detroit art, pensions	Hearsay, Relevance, Foundation
3254	1944	Excerpt from 1944 City Charter	No Objection
3255	undated	Excerpt from 1948 City Charter Tit. IV, Ch. XIX	No Objection
3256	1944	DMA A History of	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Municipal and Legislative Acts	
3257	2/7/1995	Acquisition Related Report	Relevance, Hearsay, Foundation
3258	10/8/1947	Agreement between Arts Commission and DIA Corp.	No Objection
3259	9/27/1983	Arts Commission Meeting	No Objection
3260	12/12/2012	City of Detroit Comprehensive Annual Financial Report	No Objection
3261	8/6/2012	Detroit Free Press, How DIA Millage Will Look on Your Ballot On Tuesday	Hearsay, Relevance, Foundation
3262	Jan. 1920	DIA Bulletin Vol. 3, No. 4	No Objection
3263	11/17/2010	DIA Corp. Minutes	Hearsay, Foundation
3264	1919	DMA Annual Report	No Objection
3265	Oct. 1915	DMA Bulletin Vol., No. 1	No Objection
3266	3/1/1992	Finding Aid, Clyde Hl Burroughs Records	Relevance
3267	Aug. 1980	Finding Aid, Robert Hudson Tannahill Papers	Relevance
3268	4/17/2014	Letter from DIA Corp. Attorney re: Subpoena	Hearsay; Relevance
3269	12/11/2013	M. Stryker & J. Gallagher, DIA joins deal in work with mediators that would protect art, pensions in Detroit bankruptcy, Detroit Free Press	Hearsay, Relevance, Foundation
3270	11/18/1919	Journal of the Common Council (Report of Councilman Nagel)	No Objection
3271	1/13/2014	Statement of Detroit Bankruptcy Mediators	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3272	Nov. 1990	Summary Inventory of Archives	No Objection
3273	12/16/1919	Journal of the Common Council (Report of Controller)	No Objection
3274	Jul. 2006	Comments to the Uniform Prudent Management of Institutional Funds Act	Hearsay, Relevance
3275	1/29/1962	Certificate of Amendment of the Articles of Incorporation, filed Jan. 29, 1962 for Detroit Museum of Arts Founders Society	No Objection
3276	9/30/1992	Founders Society Certificate of Assumed Name, filed Sept. 30, 1992	No Objection
3277	10/11/2000	Certificate of Amendment of the Articles of Incorporation, filed Oct. 11, 2000	No Objection
3278	8/9/2014	About the DOA, The Cultural Gem of Detroit, http://www.dia.org/about/history.aspx	Hearsay
3279	undated	Museum Chronologies and Records	Relevance, Hearsay, Foundation
3280	4/29/1916	DMA Minutes	No Objection
3281	11/12/1919	Executed Deeds of Real Estate	No Objection
3282	8/9/2014	*Search for Art, Artists in the DIA Collection*, The Detroit Inst. of Arts, *http://www.dia.org/art/search-collection.aspx*	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3283	6/25/1975	Letter from Mayor to DIA Director, dated June 25, 1975	No Objection
3284	5/24/1995	Collections Management Policy, dated May 24, 1995	No Objection
3285	8/21/2000	Letter with Standard Purchasing Agreement, dated Aug. 21, 2000	Relevance, Hearsay, Foundation
3286	10/27/2010	DIA Collections Management Policy Attachments, Outline of the Accession Process, dated Oct. 27, 2010	Hearsay
3287	2/5/1990	Museum Receipt, dated Feb. 5, 1990	No Objection
3288	2000	Form, Approval of Funds Designated for Acquisition, circa 2000	Relevance, Hearsay, Foundation
3289	1/12/1998	Restated Articles of Incorporation, adopted January 12, 1998	No Objection
3290	3/11/1958	Certificate of Amendment to the Articles of Incorporation, Detroit Museum of Art Founders Society	No Objection
3291	2/1/1986	Restated Articles of Incorporation, Founders Society Detroit Institute of Arts	No Objection
3292		INTENTIONALLY LEFT BLANK	
3293	12/17/2013	Letter from D. Woodham to K. Orr, dated Dec. 17,	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		2013	
3294	12/17/2013	Fair Market Value for Financial Planning, dated Dec. 17, 2013	Hearsay
3295	9/9/2013	Detroit Institute of Arts Amending Policy on Donations, http://artsbeat.blogs.nytimes.com/2013/09/09/detroit-institute-of-arts-amends-policy-on-donations/?_php=true&_type=blogs&_r=0	Hearsay, Relevance, Foundation
3296	8/9/2014	About Us, http://www.aam-us.org/about-us	Hearsay
3297	undated	Attorney General's Charitable Trust Section Database Search, OFFICE OF THE ATTORNEY GENERAL, http://www.ag.state.mi.us/CharitableTrust/	Relevance, Hearsay
3298	7/25/2013	E-mail dated July 25, 2013, from K. Buckfire to B. Nowling, et al., re Christies/DIA	Hearsay
3299	4/21/1947	Arts Commission Minutes	No Objection
3300	12/5/1950	Arts Commission Minutes	No Objection
3301	2/2/1951	Arts Commission Minutes	No Objection
3302	3/19/1974	Memo from DIA Corp. Director to JMCC re: Recommendations on Collections Categories and Procedures, dated Mar. 19,	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		1974	
3303	4/12/2013	Letter dated April 12, 2013, from A. Schwartz to B. Schuette, re: Detroit Institute of Arts	Hearsay, Relevance, Foundation
3304	5/24/2013	Email dated May 24, 2013, from J. Pirich to J. Evans, et al., re: DIA	Hearsay, Relevance, Foundation
3305	5/28/2013	E-mail dated May 28, 2013, from J. Pirich to R. Iann	Hearsay, Relevance, Foundation
3306	5/29/2013	E-mail dated May 29, 2013, from W. Bloomfield to J. Opperer, re: DIA materials	Hearsay, Relevance, Foundation
3307	5/24/2013	Legal Memorandum, undated attachment	Hearsay, Relevance, Foundation
3308	6/1/2013	E-mail dated June 1, 2013, from A. O'Reilly to W. Bloomfield, re: DIA Memo	Hearsay, Relevance, Foundation
3309	6/12/2013	E-mail dated June 12, 2013, from H. Meingast to A. O'Reilly	Hearsay, Relevance, Foundation
3310	3/12/1965	Arts Commission Minutes	No Objection
3311	2/24/1965	Arts Commission Minutes	No Objection
3312	5/1/2014	Email from Restuccia to Hackney re: AG -- DIA Communications and Documents	Hearsay, Relevance, Foundation
3313	11/28/1917	Letter to D.M. Ferry	No Objection
3314	10/8/1947	Arts Commission Minutes	No Objection
3315	2/25/1988	Letter from DIA Director to City Council	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3316	1/16/1991	Free Press, State's Art Community Steamed by Possible Cuts	Hearsay, Relevance
3317	11/9/2008	Free Press, Mark Stryker, Money Troubles a Risk to DIA's status	Hearsay/Relevance/Foundation
3318	Oct. 2012	Art News, It Takes a Millage	Hearsay/Relevance/Foundation
3319	6/13/2013	E-mail dated June 13, 2013 forwarding opinion	Hearsay, Relevance, Foundation
3320	7/20/2013	News Article from the Associated Press, Headline: No signs Washington to come to Detroit's rescue	Hearsay/Relevance/Foundation
3321	10/29/2013	News Article from the Associated Press, Headline: Detroit manager defends actions before bankruptcy	Hearsay/Relevance/Foundation
3322	8/12/2013	Article from State Net Capital Journal, Byline: Compiled by Rich Ehisen	Hearsay/Relevance/Foundation
3323	1/23/2014	Article from the Associated Press, Headline: Governor backs plan to bankrupt Detroit $350 M	Hearsay; speculative
3324	12/6/2013	Email chain between Rip Rapson and Daniel Howes dated December 5-6, 2013 re: Call	Hearsay
3325	12/15/2013	Email chain between Rip Rapson and Daniel Howes dated December 12-15,	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		2013 re: Are you in a position	
3326	1/16/2014	Email chain between Rip Rapson and Daniel Howes dated January 16, 2014 re: Call?	Hearsay
3327	1/21/2014	Email from Rip Rapson to Daniel Howes dated January 21, 2014 forwarding email from Rip Rapson to Darren Walker dated January 20, 2014 re: DIA governance	Hearsay
3328	1/23/2014	Email from Rip Rapson to Daniel Howes dated January 23, 2014 re: Today's Piece	Hearsay
3329	1/24/2014	Email chain between Rip Rapson and Daniel Howes dated January 24, 2014 re: Terrific piece Daniel. You just get more and more trenchant! Rip	Hearsay/Speculation
3330	1/28/2014	Email chain between Rip Rapson and Daniel Howes dated January 28, 2014 re: Quick call	Hearsay
3331	2/14/2014	Email chain between Rip Rapson and Daniel Howes dated February 14, 2014 re: Fabulous piece Daniel! Couldn't be more on the mark. Thank you! Rip	Hearsay
3332	5/12/2014	Email chain between Daniel Howes and Rip	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Rapson dated May 12, 2014 re: Your column	
3333	6/10/2014	Email chain between Laura Berman and Rip Rapson dated June 10, 2014 re: Mariam Noland	Hearsay
3334	12/4/2013	Emily Previti, "$270M+ Harrisburg parking deal clears state financing authority board," Penn Live	Hearsay/Relevance/Foundation
3335	5/10/2013	City of Harrisburg, Pennsylvania, 2011 Comprehensive Annual Financial Report	Hearsay, Relevance
3336		Professional Practices in Art Museums, Association of Art Museum Directors	No Objection
3337	4/12/2007	Stephan Salisbury, "2nd painting by Eakins sold," The Inquirer	Hearsay/Relevance/Foundation
3338	4/3/2007	City of Detroit Fiscal Analysis Division, "$30.6 Million Property Sale Proposals"	No Objection
3339	1/14/2014	John Gallagher and Mark Stryker, "$330M pledged to save pensions, DIA artwork from Detroit bankruptcy," Detroit Free Press	Hearsay
3340	7/7/2014	City of Detroit, "Illustrative Cash Flow Forecast (Plan of Adjustment Scenario)"	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3341	Oct-2010	McKinsey Consulting Report, Detroit Planning and Development Department Diagnostic	Hearsay
3342	9/22/2010	McKinsey Consulting Report, Public Private Partnerships in Detroit	Hearsay
3343	1/4/2012	John Rapisardi, "Harrisburg: A Case Study in State Law Barriers to Chapter 9," Restructuring Review, Cadwalader	Hearsay, Relevance
3344	3/27/2014	Ashton Cooper, "AAMD 'Deeply Disturbed ' at Delaware Sale," Blouin ARTINFO	Hearsay/Relevance/Foundation
3345	3/7/2007	Alan Riding, "The Louvre's Art: Priceless. The Louvre's Name: Expensive." New York Times	Hearsay/Relevance/Foundation
3346		Public Plans Database, Center for Retirement Research at Boston College	[Produced in Native Form], Hearsay
3347	9/26/2012	Sara Hamdan, "After a Sputtering Start, the Louvre Abu Dhabi Project Gathers Pace," New York Times	Hearsay/Relevance/Foundation
3348	2/22/2013	Rebecca Ruiz, "America's Richest Cultural Institutions – Slideshow," The Financialist	Hearsay/Relevance/Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3349	8/8/2013	Todd Newcombe, "Are Police and Fire Department Mergers Catching on?" GOVERNING	Hearsay/Relevance/Foundation
3350	2/6/2013	J.F. Hornbeck, "Argentina's Defaulted Sovereign Debt: Dealing with the "Holdouts"," Congressional Research Service	Relevance, Hearsay
3351	3/12/2014	Association of Art Museum Directors' Statement on Randolph College and Maier Museum of Art, Association of Art Museum Directors	No Objection
3352	4/9/2014	Neil Munshi and Vivianne Rodrigues, "Bankruptcy battle heats up over offers for Detroit art collection," Financial Times	Hearsay/Foundation
3353	12/17/2013	Matthew Dolan, "Billionaire's Detroit Buying Spree Starts to Spread," Wall Street Journal	Hearsay/Relevance/Foundation
3354	5/30/2014	Matt Helms, "Boston-Edison home breaks record, bids reach $135k in city auction," Detroit Free Press	Hearsay/Relevance/Foundation
3355	12/23/2008	Robin Pogrebin, "Branded a Pariah, the National	Hearsay/Relevance/Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Academy Is Struggling to Survive," New York Times	
3356	2/5/2009	Richard Lacayo, "Brandeis' Attempt to Turn Art into Assets," Time	Hearsay/Relevance/Foundation
3357	6/30/2011	Randy Kennedy, "Brandeis Settles Suit Over Proposed Art Sale," New York Times	Hearsay/Relevance/Foundation
3358	2/3/2009	Daniel Grant, "Is the University's Museum Just a Rose to Be Plucked?" Wall Street Journal	Hearsay/Relevance/Foundation
3359	12/10/2010	Nannette Miranda, "Judge OKs Sale of Calif Buildings in Early Ruling," abc11.com	Hearsay/Relevance/Foundation
3360	5/4/2010	Peter Carbonara, "Cash-Hungry States Are Putting Buildings on the Block," New York Times	Hearsay/Relevance/Foundation
3361		City Employer Data, Crain's Detroit Business	Hearsay; Relevance; Foundation
3362	4/29/2013	Caroline Porter, "Chicago Revises Parking-Meter Deal," Wall Street Journal	Hearsay/Relevance/Foundation
3363	5/6/2013	Cheryl Corley, "Chicago's Famed Field Museum Struggles To Dig Out Of A Hole," NPR	Hearsay/Relevance/Foundation
3364	11/8/2013	City of Harrisburg, Pennsylvania, 2012 Comprehensive Annual	Hearsay, Relevance, Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Financial Report	
3365		Code of Ethics for Museums, American Alliance of Museums	No Objection
3366	May-2014	Alicia H. Munnell, Jean-Pierre Aubry, and Mark Cafarelli, "COLA Cuts in State/Local Pensions," Center for Retirement Research at Boston College	Hearsay
3367	3/13/2014	Randy Kennedy, "College Art Museum Hit With Sanction After Sale of Bellows Work," New York Times	Hearsay/Foundation
3368	Mar-2003	Richard T. Carson, "Contingent Valuation and Lost Passive Use: Damages from the Exxon Valdez Oil Spill," Environmental and Resource Economics	Hearsay/Relevance/Foundation
3369	2003	Jose Sanz, Luis Herrero and Ana Maria Bedate, "Contingent Valuation and Semiparametric Methods: A Case Study of the National Museum of Sculpture in Valladolid, Spain," Journal of Cultural Economics	Hearsay/Relevance/Foundation
3370	2000	Walter Santagata and Giovanni Signorello, "Contingent Valuation of	Hearsay/Relevance/Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		a Cultural Public Good and Policy Design: The Case of "Napoli Musei Aperti," Journal of Cultural Economics	
3371	4/24/2012	Jennifer Schuessler, "Court Approves Fisk University's Sale of Georgia O'Keeffe Collection," New York Times	Hearsay/Foundation
3372	7/16/2009	Travis Loller, "Court: O'Keeffe Museum has no right to Fisk University art," USA Today	Hearsay/Relevance/Foundation
3373	6/29/2011	Lee Rosenbaum, "Fighting Words: Randolph College Responds to AAMD's Censure," Culture Grrl	Hearsay/Relevance/Foundation
3374	5/6/2014	Q & A, Delaware Art Museum	Hearsay, Relevance
3375	6/19/2014	Margie Fishman, "Delaware Art Museum loses accreditation," The News Journal	Hearsay/Relevance/Foundation
3376	6/18/2014	Margie Fishman, "Delaware Art Museum painting brings $4.25 million," The News Journal	Hearsay/Relevance/Foundation
3377	5/6/2014	Marjorie Fishman, "Art museum names first painting to be sold," The News Journal	Hearsay/Relevance/Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3378	2013	Business Trends 2013, Deloitte University Press	Hearsay, Relevance
3379	1994	Fernand Martin, "Determining the Size of Museum Subsidies," Journal of Cultural Economics	Hearsay/Relevance/Foundation
3380	3/25/2014	Khalil AlHajal, "Detroit EM Kevyn Orr: Millionaires wanted to buy DIA works, turn Belle Isle into gated community," Mlive	Hearsay/Foundation
3381	2/25/2014	"Detroit overhaul plan would boost fares, security," Metro Magazine	Hearsay/Relevance/Foundation
3382	6/14/2013	City of Detroit, "Proposal for Creditors"	No Objection
3383	12/3/2013	Monica Davey, Bill Vlasic and Mary Williams Walsh, "Detroit Ruling on Bankruptcy Lifts Pension Protections," New York Times	Hearsay/Relevance/Foundation
3384	5/29/2014	Christine Macdonald, "Detroit spends $8.7 million to flip 30 homes that bring in $2 million," The Detroit News	Hearsay/Relevance/Foundation
3385	6/7/2013	Matt Helms, "Detroit to offer creditors pennies on the dollar in pitch to avoid bankruptcy," Detroit Free Press	Hearsay/Foundation
3386	5/12/2014	Monica Davey, "Detroit	Hearsay/Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Tries to Sell Itself, One House at a Time," New York Times	
3387	10/14/2005	City of Detroit Fiscal Analysis Division, "Re: Securitization of the Detroit Windsor Tunnel Lease"	No Objection
3388	6/6/2013	Virginia Postrel, "Detroit's Van Gogh Would Be Better Off in L.A.," Bloomberg	Hearsay/Foundation
3389	2/10/2014	David Muller, "Detroit's Belle Isle becomes 102nd state park today," MLive	Hearsay/Relevance/Foundation
3390	7/10/2013	Brent Snavely, "Detroit's legal fees could top $100 million for a Chapter 9 bankruptcy," Detroit Free Press	Hearsay/Relevance/Foundation
3391	11/26/2013	Liz Farmer, "Detroit's Pension Is Actually Well-Funded, So What's All the Fuss?" GOVERNING	Hearsay/Relevance/Foundation
3392	9/8/2013	Mark Stryker, "DIA in peril: A look at the museum's long, tangled relationship with Detroit politics and finances," Detroit Free Press	Hearsay/Relevance/Foundation
3393	2013	Spring 2013 DIA Visitor Engagement Survey Report, Detroit Institute of Arts	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3394	5/24/2013	Mark Stryker and John Gallagher, DIA's art collection could face sell-off to satisfy Detroit's creditors," Detroit Free Press	Hearsay/Relevance/Foundation
3395	11/11/2006	Carol Vogel, "Eakins Masterwork Is to Be Sold to Museums," New York Times	Hearsay/Relevance/Foundation
3396	12/3/2004	Stevenson Swanson, "Field Museum art sold for $17 million," Chicago Tribune	Hearsay/Foundation
3397	10/24/2004	William Mullen, "History for sale," Chicago Tribune	Hearsay/Foundation
3398	May-2012	BOP Consulting, Measuring the economic benefits of art and culture	Hearsay; Improper Opinion Testimony
3399	6/30/2012	"Independent Auditor's Report, Police and Fire Retirement System of the City of Detroit"	No Objection
3400	7/23/2013	Robin Pogrebin, "The Death of a Museum," New York Times	Hearsay/Foundation
3401	5/29/2013	Kathleen Gray and Matt Helms, "Gov. Snyder: Detroit EM must consider everything – even DIA, Belle Isle – to fix city's finances," Detroit Free Press	Hearsay/Foundation
3402	6/30/2012	Gabriel Roeder Smith & Company, "The General	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Retirement System of The City of Detroit – 74th Annual Actuarial Valuation"	
3403	4/28/2014	Dave Marcheskie, "Harrisburg City freezes hiring to manage budget deficit," abc27.com	Hearsay/Relevance/Foundation
3404	9/12/2013	Romy Varghese, "Harrisburg Default Underlines Lack of State Support: MMA," Bloomberg	Hearsay/Relevance/Foundation
3405	7/24/2013	Mary Williams Walsh and John Hurdle, "Harrisburg Sees Path to Restructuring Debts Without Bankruptcy Filing," New York Times	Hearsay/Foundation
3406	Nov-2010	John Buntin, "Harrisburg's Failed Infrastructure Project," GOVERNING	Hearsay/Relevance/Foundation
3407	4/17/2014	Tom Lochner, "Hercules: Sale of municipal utility ends multimillion-dollar fiasco," Contra Costa Times	Hearsay/Relevance/Foundation
3408	9/4/2013	Khalil AlHajal, "Highlights from Kevyn Orr deposition: EM talks DIA, federal aid and casino revenue," MLive.com	Hearsay/Foundation
3409	8/23/2013	Michael G. Bennett, "How Best To Spend The Detroit	Hearsay/Relevance/Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Institute of Arts' 15 Minutes of Fame," Huffington Post	
3410	2/17/2010	George Hostetter, "Hundreds attend auction for Met museum property," Clovis Independent	Hearsay/Relevance/Foundation
3411	1/12/2007	Michael Kimmelman, "In the Company of Eakins," New York Times	Hearsay/Relevance/Foundation
3412	2/10/2010	City of Indianapolis, Parking Modernization	Hearsay, Relevance
3413	7/26/2010	City of Indianapolis, Water & Wastewater System Transfer to Citizens Energy Group	Hearsay, Relevance
3414	4/9/2014	Nathan Bomey, "Insurer solicits offers for DIA artwork; several billion-dollar bids received," Detroit Free Press	Hearsay/Relevance/Foundation
3415	5/15/2014	Mark Stryker and John Gallagher, "Judge rules Detroit bankruptcy creditors can't remove art from DIA walls," Detroit Free Press	Hearsay/Relevance/Foundation
3416	Dec-2005	Jura Consultants, "Bolton's Museum, Library and Archive Services – An Economic Valuation"	Relevance; Hearsay; Improper Opinion Testimony
3417	10/4/2013	Alexis Wiley, "Kevyn Orr open to ideas on DIA	Hearsay/Relevance/Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		collection," myFOXDetroit.com	
3418	10/3/2013	Sarah Cwiek, "Kevyn Orr talks privatization, pensions, DIA art at forum," Michigan Radio	Hearsay/Relevance/Foundation
3419	3/20/2013	Bankole Thompson, "Kevyn Orr: 'Everything is on the table,'" Michigan Chronicle	Hearsay/Relevance/Foundation
3420	1/15/2014	Moody's Investors Service, "Rating Methodology – US Local Government General Obligation Debt"	Hearsay
3421	9/12/2013	Standard & Poor's Ratings Services, "U.S. Local Governments General Obligation Ratings: Methodology And Assumptions"	Hearsay
3422	5/14/2013	Sara Taher, "Louvre Abu Dhabi," TimeOut Abu Dhabi	Hearsay/Relevance/Foundation
3423	10/16/2006	Brenda Goodman, "The Louvre Views Its Art in a New Way (When Showing It in Atlanta)," New York Times	Hearsay/Relevance/Foundation
3424	5/12/2013	City of Detroit, "Financial and Operating Plan," Office of the Emergency Manager	No Objection
3425		Public Employment Relations, Act 336 of	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		1947, Legislative Council, State of Michigan	
3426	4/17/2011	Robin Pogrebin, "A Chastised Museum Returns to Life," New York Times	Hearsay/Relevance/Foundation
3427	12/6/2008	Randy Kennedy, "National Academy Sells Two Hudson River School Paintings to Bolster its Finances," New York Times	Hearsay/Relevance/Foundation
3428	5/23/2013	Chris Glynn, "No to water P3 for Pennsylvania municipality," Infrastructure Investor	Hearsay/Relevance/Foundation
3429	Feb-2002	Doug Noonan, "Contingent Valuation Studies in the Arts and Culture: An Annotated Bibliography," The Cultural Policy Center at the University of Chicago	Hearsay/Relevance/Foundation/Improper Opinion Testimony
3430	5/5/2013	City of New York, "Mayor Bloomberg Announces Agreement to Sell Two City-owned Buildings to Reduce Office Space and Further Increase Efficiency of Government Operations"	Hearsay/Relevance/Foundation
3431	5/5/2014	Jamie S. Fields, "Objection of Jamie S. Fields to the City of Detroit's Fourth Amended	Hearsay, Relevance

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Plan of Adjustment"	
3432	11/13/2007	Eileen Kinsella, "Opponents of Randolph College Art Sale Sue to Halt Auction," ARTnews	Hearsay/Relevance/Foundation
3433	4/7/2014	Christine Ferretti, "Orr urges public hearing on proposed parking fine hikes," Detroit News	Hearsay/Relevance/Foundation
3434	8/5/2013	Mark Stryker, "Orr's office hires auction house Christie's to take 2nd look at DIA's art," Detroit Free Press	Hearsay/Relevance/Foundation
3435	9/30/2011	Pension Benefit Guaranty Corp, Fiscal Year Closing File	No Objection
3436		INTENTIONALLY LEFT BLANK	Duplicate of 3346 will not be used per 8/24/2014 Funk e-mail, Hearsay
3437	9/18/2009	Historic 3-Year Louvre Atlanta Partnership Brings in over 1.3M Visitors to the High, High Museum of Art	Hearsay/Relevance/Foundation
3438	9/17/2012	City of Detroit Fiscal Analysis Division, "Proposed Belle Isle Lease Agreement between the City of Detroit and the State of Michigan"	No Objection
3439		Local Financial Stability and Choice Act, Act 436	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		of 2012, Legislative Council, State of Michigan	
3440	10/2/2007	Randolph College to Auction Four Paintings, Randolph College	Hearsay/Relevance/Foundation
3441	12/16/2013	Nick Carey, "Regional water deal elusive for Detroit emergency manager," Reuters	Hearsay/Relevance/Foundation
3442	8/8/2013	Cate Long, "The real history of public pensions in bankruptcy," Reuters	Hearsay
3443	10/18/2010	Robin Pogrebin, "Sanctions Are Ending For Museum," New York Times	Hearsay/Relevance/Foundation
3444	1/21/2014	Paul Egan, Kathleen Gray and Mark Stryker, "Snyder expected to announce plan to guard Detroit pensions, DIA art," Detroit Free Press	Hearsay
3445	8/23/2010	Emily Brandon, "The 10 Biggest Failed Pension Plans," US News	Hearsay
3446	12/6/2012	John M. Kamensky, "The Accelerating Movement to Share Services," GOVERNING	Hearsay/Relevance/Foundation
3447	Aug-2013	Jeromin Zettelmeyer, Christoph Trebesch and Mitu Gulati, "The Greek Debt Restructuring: An Autopsy," Peterson	Hearsay/Relevance/Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Institute for International Economics	
3448	7/11/2014	Ben Austen, "The Post-Post-Apocalyptic Detroit," New York Times	Hearsay/Relevance/Foundation/Improper Opinion Testimony
3449	12/11/2013	Nick Gillespie, "Time to Sell the Family Jewels, Detroit," The Daily Beast	Hearsay, Foundation, Relevance, Improper Opinion Testimony
3450	8/5/2013	"Valuations Necessary Part of City's Restructuring Effort to Secure a Viable, Strong Detroit," City of Detroit	Hearsay, Foundation, Relevance
3451	2002	Eric Thompson, Mark Berger, Glenn Blomquist and Steven Allen, "Valuing the Arts: A Contingent Valuation Approach," University of Nebraska – Lincoln	Hearsay, Foundation, Relevance, Improper Opinion Testimony
3452	11/27/2013	Tim Stuhldreher, "Waste authority to acquire Harrisburg incinerator a week later," LancasterOnline	Hearsay, Foundation, Relevance
3453	undated	City of Detroit, "City Owned Properties from Foreclosure"	No Objection
3454	2013	City of Detroit, "2013 City of Detroit Foreclosure Property List"	No Objection
3455	10/1/2010	McKinsey Consulting Report, Detroit Diagnostic Synthesis Template	No Objection
3456	12/3/2013	Douglas Woodham, Letter	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		to the Emergency Manager, Christie's Americas	
3457	4/12/2006	Elizabeth Carvlin, "Michigan: Casino's Garage Sale," The Bond Buyer	Hearsay, Foundation, Relevance
3458	7/16/2014	City of Detroit, 10-Year Financial Projections	No Objection
3459	3/4/2014	Non-binding indications of interest from Yuan Management Hong Kong Limited dated March 4, 2014	Hearsay, Relevance
3460	undated	Confidential Proposal to the City of Detroit by Art Capital Group, LLC for up to $3 Billion Senior Secured Exit Facility	Hearsay, Relevance
3461	undated	Confidential Proposal to the City of Detroit by Art Capital Group, LLC for up to $2 Billion Senior Secured Exit Facility	Hearsay, Relevance
3462	4/4/2014	Non-binding indication of interest from Catalyst Acquisitions, LLC to S. Spencer of Houlihan Lokey dated April 4, 2014	Hearsay, Relevance
3463	4/3/2014	Non-binding indication of interest from Poly International Auction to S. Spencer of Houlihan Lokey dated April 3, 2014	Hearsay, Relevance
3464	8/4/2014	Staff Picks for Graham	Hearsay, Relevance,

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		W.J. Beal	Foundation
3465	Mar-2014	Director's Letter written by Graham W.J. Beal	Hearsay, Relevance, Foundation
3466	7/29/2014	Detroit Free Press article "Republican adviser quietly helped Detroit win DIA funding."	Hearsay; speculative; foundation
3467	7/29/2014	Article from the Detroit Free Press entitled "Bankruptcy revelation: Detroit weighed DIA spin-off for $550 m in 2011"	Hearsay; speculative; foundation
3468	10/18/2013	Article from the Chicago Tribune dated October 2013, titled "Will Detroit have to sell its art to pay its bills?"	Hearsay; speculative; foundation
3469	undated	Proposal for sale by Christie's for property from the Detroit Institute of Arts	Hearsay, Relevance, Foundation
3470	5/29/2013	Email chain with the subject "DIA materials"	Hearsay
3471	9/9/2013	New York Times article titled "Detroit Institute of Arts Amending Policy on Donations"	Hearsay; speculative; foundation
3472	undated	Plan Confirmation Factual Propositions	Hearsay
3473	12/19/2012	Professional Service Contract Transmittal Record; Services Contract Between City of Detroit, Michigan and Miller Buckfire & Company,	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		L.L.C.	
3474	7/16/2013	Change Order #1; Addendum to Exhibits A & B to Include Additional Requested Services and Fees	No Objection
3475	8/26/2013	Addendum #1 to Change Order #1	No Objection
3476	6/16/2014	Amended and Restated Change Order #1	No Objection
3477	5/5/2014	City of Detroit Water and Sewage Disposal Fund; 10-Year Projections	No Objection
3478	5/5/2014	Means of Implementation of the Plan	No Objection
3479	7/2/2014	Estimate provided by Electronic Municipal Market Access	Hearsay, Foundation
3480	5/5/2014	Fourth Amended Plan Disclosure Statement	Incomplete; No Objection
3481	2/21/2014	Interest Rate Reset Chart	Incomplete; No Objection
3482	2/21/2014	Summary of Principal DWSD Bond Terms	Incomplete; No Objection
3483	4/9/2012	Moody's Investors Service Rating Update for DWSD	No Objection
3484	6/17/2013	Moody's Investors Service Rating Update for DWSD downgrading water and sewer revenue ratings	No Objection
3485	5/29/2012	Fitch Ratings Report entitled Fitch Rates Detroit, MI Sewer Revs ’A-’; Downgrades	No Objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Outstanding Debt	
3486	2/28/2014	Fitch Ratings Report entitled Fitch Downgrades Detroit Michigan Senior and Sub Water Revs, and Sewer Revs; Negative Watch Maintained	No Objection
3487	7/1/2014	Bloomberg raw data curve	No Objection
3488	10/2/2013	Analysis of New Water/Sewer Authority	No Objection
3489	undated	Bloomberg Transcript	No Objection
3490	7/10/2013	Updated Pro Forma and Restructuring Analysis, Impact of New Regional Water and Sewer Authority on Future Bond Issuance for the Detroit Water & Sewerage Department from Seibert, Brandford, Shank & Company, L.L.C.	Hearsay
3491	10/18/2013	City of Detroit: DWSD, Oakland County Business Issues Memo, Conway/Miller Buckfire Response	No objection
3492	1/8/2014	Presentation by Barclays to Miller Buckfire & Co.	No objection
3493	2/5/2014	Email chain from Robert Daddow to Van Dusen, Hupp and Buckfire re: GLWSA MOU, Appendix and Summary	Hearsay
3494	7/30/2013	Email chain from Buckfire	Hearsay, Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		to Bennett and Heiman re: Christie's and the DIA	
3495	10/23/2013	Email chain from Buckfire to Heiman re: Note from Gargaro	Hearsay
3496	4/29/2013	Email chain from Buckfire to Gargaro re: DIA Visit	Hearsay; Foundation
3497	8/2/2013	Christie's Appraisals, Inc. Agreement	No objection
3498	8/4/2013	Letter from Douglas Woodham to Kenneth Buckfire re: appraisal agreement	Hearsay
3499	8/25/2013	Email chain from Buckfire to Whiting re: Our Meeting with DIA	Hearsay
3500	5/7/2013	Email chain from Buckfire to Gargaro re: DIA Note	Hearsay
3501	6/14/2013	Proposal for Creditors	No Objection
3502	7/15/2014	Annmarie Erickson Subpoena to Testify at a Deposition	No Objection
3503	6/19/2014	Detroit Institute of Arts Subpoena to Testify at a Deposition	No Objection
3504	2000	Code of Ethics for Museums	No Objection
3505	2/16/1885	Public Acts of 1885	No Objection
3506	4/15/1919	Public Acts Number 67	No Objection
3507	6/18/1981	Memorandum re: Transfer of art collections to city ownership in 1919	Privileged
3508	8/27/1991	Memorandum from the Detroit Institutes of Art to File from Suzanne	Privileged

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Quigley	
3509	10/18/2013	Article from A&E entitled "Will Detroit have to sell its art to pay its bills?"	Hearsay; speculative; foundation
3510	11/17/2013	Detroit Free Press Article with the headline "DIA here to help - but it's not here to be raided."	Hearsay; speculative; foundation
3511	5/5/2014	Exhibit 1A.91 entitled "Principal terms of DIA settlement"	No objection
3512	9/12/2013	Email correspondence between Ms. Fusco and Annmarie Erickson	Hearsay
3513	9/20/2013	Email chain from Fusco Vanessa, sent Friday, September 20, 2013 to Karen Gray; McAndrew, Erin, and others	Hearsay
3514	9/19/2013	Email from Allison Whiting to Bonnie Brennan, Vanessa Fusco, Paul Provost, Sarah Vandeweerdt	Hearsay
3515	12/3/2013	Five-page letter on Christie's letterhead, dated December 3, 2013	No objection
3516	9/4/2013	Agenda	Hearsay, Foundation
3517	4/22/2014	Court Order Appointing Expert Witness	No objection
3518	undated	Jones Day Spreadsheet Listing Materials Provided by City of Detroit to Phoenix Management Services	No objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3519	Apr-2014	NASRA Issue Brief	Hearsay; speculative; foundation
3520	Jan-2014	Blinken Report, Strengthening the Security of Public Sector Defined Benefit Plans	Hearsay; speculative; foundation
3521	1/16/2014	Release by the National Conference on Public Employee Retirement Systems	Hearsay; speculative; foundation
3522	6/25/2012	Government Accounting Standards Board news release June 25, 2012	Hearsay; speculative; foundation
3523	June 2012	GASB Statement Number 67	No Objection
3524	7/18/2013	Declaration of Charles Moore	No Objection
3525	Oct-2009	NASRA Publication - Public Fund Survey Summary of Findings for FY 2008	Hearsay
3526	May-2014	Every Neighborhood Has A Future . . . And It Doesn't Include Blight; Detroit Blight Removal Task Force Plan	No Objection
3527	8/7/2013	Chain of emails from Kevin Orr to Shani Penn and Sonya Mays re: Follow ups from last week	Hearsay
3528	Nov-2009	Fire Service Performance Measures	Hearsay
3529	1/3/2008	CRS Report for Congress	Hearsay
3530	undated	Calculating Police Response Times	Hearsay, Relevance, Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3531	7/9/2013	City of Detroit Head Count Report, June 2013	Two documents have apparently been combined
3532	10/21/2013	Email from Kevin Haggard to Bob Daddow re: Business Issues-Conway/Buckfire Reports	Hearsay
3533	7/3/2014	30(b)(6) Subpoena to Executive Office of the Governor of the State of Michigan	No Objection
3534	7/2/2014	Stipulation and Agreement Regarding the Subpoenas from FGIC	No Objection
3535	5/29/2013	Article titled "Governor Rick Synder Stands By Detroit Emergency Manager's Exploration of DIA Collection as City Asset"	Hearsay, Relevance, Foundation
3536	7/29/2014	Notice of Videotaped Deposition of Michael Plummer	No Objection
3537	7/25/2014	Article prepared by Zhang Yi entitled "Review of Expert Witness Report of Michael Plummer, Artvest Partners, Dated July 8, 2014"	Hearsay, Foundation; Improper Opinion Testimony
3538	10/6/2013	Article by Katherine Boyle from the Washington Post, dated October 6, 2013, entitled "Poor Detroit: What	Hearsay, Foundation, Improper Opinion Testimony

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		money giveth, It can taketh away"	
3539	12/3/2013	Letter from Woodham to Orr re: final phase of appraisal	No Objection
3540	10/7/2013	Email from Provost to Woodham and McAndrew re: Weekly Detroit briefing	Hearsay, Relevance
3541	6/19/2014	Rip Rapson Subpoena to Testify at Deposition	No Objection
3542	7/29/2014	Mission and Values, The Kresge Foundation	Hearsay, Relevance, Foundation
3543	6/20/2014	City's Third Amended List of Fact Witnesses	No Objection
3544	4/18/2014	City's Amended List of Fact Witnesses	No Objection
3545	6/20/2014	The Detroit Institute of Arts' Fact Witness List	Relevance
3546	10/27/2010	Outline of Accession Process	Hearsay
3547	11/9/1988	Deed of Gift from W. Hawkins Ferry	No objection
3548	1/20/2014	Subpoena to Executive Office of the Governor of the State of Michigan	No Objection
3549	7/29/2014	Third Stipulation and Agreement Regarding the Subpoenas from FGIC	No Objection
3550	3/21/2012	Email chain from Stibitz to Dillon, Muchmore, Roberts Saxton and Stanton re: What does the state "owe" Detroit?	Hearsay, Foundation
3551	3/12/2013	Email chain from Stanton	Hearsay, Foundation

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		to Stibitz and Wortley re: Detroit Rev Sharing	
3552	5/23/2013	Email chain from Cole to Wortley re: Sales Tax/Revenue Sharing & Detroit Rev Share Projections to FY 2025	Hearsay, Foundation
3553	8/5/2013	News Article from the State Net Capitol Journal titled "No State or Federal Bailout for Detroit"	Hearsay, Relevance, Foundation
3554	5/6/2014	State of Michigan's Answers and Objections to Detroit Public Safety Unions' Interrogatories	No Objection
3555	2014	Form of the Contribution Agreement	Incomplete Document, Best Evidence
3556	4/30/2014	Plan for the Adjustment of Debts, Summary Discussion Document	Incomplete Document
3557	10/24/2013	Memo from B. Hartzell to K. Orr regarding Request for Amendment to FY2014 Budget of the City of Detroit	No objection
3558	undated	Plante Moran - City of Detroit Assessing Division Operational Recommendations	Hearsay
3559	10/18/2001	Ordinance No. 18-01 to Authorize the Issuance of Sewage Disposal System Revenue Bonds	No objection
3560	9/17/1923	Acknowledgment of Gift	No objection
3561	12/22/1947	Acknowledgment of Gift	No objection

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3562	multiple	DIA file re: Caernarvon Castle including approval of funds designated for acquisition	Hearsay
3563	1/20/1976	Founders Society DIA Board of Trustees Meeting	No objection
3564	5/1/2014	M. Stryker & N. Bomey, Documents reveal DIA, Schuette talked months before Detroit Bankruptcy, Detroit Free Press	Hearsay, Speculation, Relevance
3565	undated	Rip Rapson, The Kresge Foundation	Hearsay
3566	April 2014	Speaker Information, Detroit Bankruptcy & Beyond, Organizing for Change in Distressed Cities	Hearsay
3567	1/16/2014	The Detroit News Article, Foundation bets big on city	Hearsay, Speculation, Relevance
3568	1/16/2014	The Detroit News Article, Gov pitches $350M for DIA art, pensions	Hearsay, Speculation, Relevance
3569	7/28/2014	The Detroit News Article, Detroit far from sealing Chapter 9 deal	Hearsay, Speculation
3570	7/29/2014	Detroit Free Press Article, Republican adviser quietly helped Detroit win DIA funding	Hearsay, Speculation, Relevance
3571	7/28/2014	Detroit Free Press Article, Bankruptcy revelation: Detroit weighed DIA spin-	Hearsay, Speculation, Relevance

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		off for $550M in 2011	
3572	May 2013	Exceutive Summary, Detroit Future City Strategic Framework	No Objection
3573	May 2013	Full Detroit Future City Strategic Framework Book, Detroit Future City Strategic Framework	No Objection
3574		Rip Rapson Presentation, Detroit Bankruptcy & Beyond, Organizing for Change in Distressed Cities; https://www.youtube.com/watch?v=z7nXphsL_QA	IMAGE MISSING FROM PRODUCTION
3575	1932	Arts Commission Public Statements	No Objection
3576	3/3/1933	Arts Commission Minutes	No Objection
3577	undated	001_Bruegel_Wedding.pdf	Hearsay
3578	undated	002_vanGogh_Self_Portrait.pdf	Hearsay
3579	undated	003_vanGogh_Postman_Roulin.pdf	Hearsay
3580	undated	004_Rembrandt_Visitation.pdf	Hearsay
3581	undated	005_Picasso_Melancholy.pdf	Hearsay
3582	undated	006_Church_Cotopaxi.pdf	Hearsay
3583	undated	007_Giacometti_Standing.pdf	Hearsay
3584	undated	008_Matisse_Window.pdf	Hearsay
3585	undated	009_Rothko_Orange_Brown.pdf	Hearsay
3586	undated	010_Caravaggio_Martha_	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Mary.pdf	
3587	undated	011_Cezanne_Madame.pdf	Hearsay
3588	undated	012_Picasso_Armchair.pdf	Hearsay
3589	undated	013_vanGogh_Banks_Oise.pdf	Hearsay
3590	undated	014_Newman_Be_I.pdf	Hearsay
3591	undated	015_Snake_Dragon.pdf	Hearsay
3592	undated	016_Still_Untitled.pdf	Hearsay
3593	undated	017_Warhol_Self.pdf	Hearsay
3594	undated	018_Matisse_Poppies.pdf	Hearsay
3595	undated	019_Michelangelo_drawing.pdf	Hearsay
3596	undated	020_Whistler_Nocturne.pdf	Hearsay
3597	undated	021_Bacon_Study_Crouching.pdf	Hearsay
3598	undated	022_Tiglath_Pileser.pdf	Hearsay
3599	undated	023_Picasso_Girl_Reading.pdf	Hearsay
3600	undated	024_Dancers_Green.pdf	Hearsay
3601	undated	025_Rodin_Thinker.pdf	Hearsay
3602	undated	026_Matisse_Coffee.pdf	Hearsay
3603	undated	027_Matisse_Wild_Poppies.pdf	Hearsay
3604	undated	028_Miro_Self_Portrait.pdf	Hearsay
3605	undated	029_Seurat.pdf	Hearsay
3606	undated	030_Poussin_Selene.pdf	Hearsay
3607	undated	031_Constable_Glebe.pdf	Hearsay
3608	undated	032_Matisse_Wild_Poppies.pdf	Hearsay
3609	undated	033_Marc_Animals.pdf	Hearsay
3610	undated	034_Rubens_David.pdf	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3611	undated	035_Kline_Siskind.pdf	Hearsay
3612	undated	036_Gris_Still_Life.pdf	Hearsay
3613	undated	037_Bellows_June.pdf	Hearsay
3614	undated	038_Bingham_Trappers.pdf	Hearsay
3615	undated	039_Kandinsky_Study.pdf	Hearsay
3616	undated	040_Renoir_Seated_Bather.pdf	Hearsay
3617	undated	041_Renoir_Armchair.pdf	Hearsay
3618	undated	042_Monet_Gladioli.pdf	Hearsay
3619	undated	043_Ruisdael_Jewish.pdf	Hearsay
3620	undated	044_Titian_judith.pdf	Hearsay
3621	undated	045_Bellotto_Tiber.pdf	Hearsay
3622	undated	046_Bronzino_Eleonora.pdf	Hearsay
3623	undated	047_Copley_Watson.pdf	Hearsay
3624	undated	048_Beckmann_Self_portrait.pdf	Hearsay
3625	undated	049_Cezanne_Victoire.pdf	Hearsay
3626	undated	050_Cezanne_Three_Skulls.pdf	Hearsay
3627	undated	051_Picasso_Seated_Woman.pdf	Hearsay
3628	undated	052_Rodin_Eve.pdf	Hearsay
3629	undated	053_Fuseli_Nightmare.pdf	Hearsay
3630	undated	054_Giacometti_Annette.pdf	Hearsay
3631	undated	055_Picasso_Pallares.pdf	Hearsay
3632	undated	056_Cezanne_Bathers.pdf	Hearsay
3633	undated	057_Holbein_Woman.pdf	Hearsay
3634	undated	058_deKooning_Merritt.pdf	Hearsay
3635	undated	059_Gauguin_SelfPortrait	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		.pdf	
3636	undated	060_Picasso_Harlequin.pdf	Hearsay
3637	undated	061_Provost_Last_Judgment.pdf	Hearsay
3638	undated	062_Smith_Cubi.pdf	Hearsay
3639	undated	063_Picasso_Anis.pdf	Hearsay
3640	undated	064_Neri_di_Bicci_Tobias.pdf	Hearsay
3641	undated	065_Sweerts_Studio.pdf	Hearsay
3642	undated	066_Hals_Swalmius.pdf	Hearsay
3643	undated	067_Reni_Angel.pdf	Hearsay
3644	undated	068_Lichtenstein_Interior.pdf	Hearsay
3645	undated	069_Degas_Violinist.pdf	Hearsay
3646	undated	070_Gozzoli_Virgin.pdf	Hearsay
3647	undated	071_Steen_Gamblers.pdf	Hearsay
3648	undated	072_Le_Nain_Piper.pdf	Hearsay
3649	undated	073_Bernini_Chair.pdf	Hearsay
3650	undated	074_Gentileschi_Judith.pdf	Hearsay
3651	undated	075_Renoir_White.pdf	Hearsay
3652	undated	076_Kirchner_Winter.pdf	Hearsay
3653	undated	077_Murillo_Immaculate.pdf	Hearsay
3654	undated	078_Church_Syria.pdf	Hearsay
3655	undated	079_Bellini_Madonna.pdf	Hearsay
3656	undated	080_Rubens_Hygeia.pdf	Hearsay
3657	undated	081_Judd_Stack.pdf	Hearsay
3658	undated	082_Gainsborough_Lady_Anne.pdf	Hearsay
3659	undated	083_Sargent_Mosquito.pdf	Hearsay
3660	undated	084_Rauschenberg_Creek.pdf	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3661	undated	085_VanGogh_Diggers.pdf	Hearsay
3662	undated	086_Guercino_Assumption.pdf	Hearsay
3663	undated	087_Picasso_Bather.pdf	Hearsay
3664	undated	088_Gainsborough_Savage.pdf	Hearsay
3665	undated	089_Fragonard_Shepherdess.pdf	Hearsay
3666	undated	090_Fragonard_Grape_Gatherer.pdf	Hearsay
3667	undated	091_Fragonard_Reaper.pdf	Hearsay
3668	undated	092_Fragonard_Gardner.pdf	Hearsay
3669	undated	093_Fra_Angelico_Annunciatory_Angel.pdf	Hearsay
3670	undated	094_Sassetta_Procession.pdf	Hearsay
3671	undated	095_Chardin_Still_Life.pdf	Hearsay
3672	undated	096_Murillo_Flight.pdf	Hearsay
3673	undated	097_Dubuffet_Le_plomb.pdf	Hearsay
3674	undated	098_Degas_Jockeys.pdf	Hearsay
3675	undated	099_Renoir_Graziella.pdf	Hearsay
3676	undated	100_Rubens_Philippe_Brother.pdf	Hearsay
3677	undated	101_Picasso_Fruit.pdf	Hearsay
3678	undated	102_Hals_Portrait_Woman.pdf	Hearsay
3679	undated	103_Van_Eyck_Jerome.pdf	Hearsay
3680	undated	104_Master_Lucy_Legend_Virgin_Rose.pdf	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3681	undated	105_Titian_Flute.pdf	Hearsay
3682	undated	106_Parmigianino_Circumcision.pdf	Hearsay
3683	undated	107_Whistler_Arrangement.pdf	Hearsay
3684	undated	108_Goya_Dona_Amalia.pdf	Hearsay
3685	undated	109_Rubens_Briseis.pdf	Hearsay
3686	undated	110_Ter_Borch_Lady_Toilette.pdf	Hearsay
3687	undated	111_Gentileschi_Orazio_Young_Woman.pdf	Hearsay
3688	undated	112_Pechstein_Under_Trees.pdf	Hearsay
3689	undated	113_Pissarro_Path.pdf	Hearsay
3690	undated	114_Courbet_Bather.pdf	Hearsay
3691	undated	116_Feininger_Sidewheeler.pdf	Hearsay
3692	undated	117_Degas_Dancers.pdf	Hearsay
3693	undated	119_Cole_Kaaterskill.pdf	Hearsay
3694	undated	120_Dix_Self_Portrait.pdf	Hearsay
3695	undated	121_Calder_X_and.pdf	Hearsay
3696	undated	122_Ingres_Perseus.pdf	Hearsay
3697	undated	123_Maillol_Flore.pdf	Hearsay
3698	undated	124_Perugino_Madonna.pdf	Hearsay
3699	undated	125_Cornell_Night_Songs.pdf	Hearsay
3700	undated	126_Tiepolo_Mandolin.pdf	Hearsay
3701	undated	127_Cassatt_Garden.pdf	Hearsay
3702	undated	128_Botticelli_Resurrected_Christ.pdf	Hearsay
3703	undated	129_Gerard_David_Annunciation.pdf	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3704	undated	130_Joos_van_der_Beke_Adoration.pdf	Hearsay
3705	undated	131_Bouguereau_Nut.pdf	Hearsay
3706	undated	132_Miro_Women_Bird.pdf	Hearsay
3707	undated	133_Romano_Immortality.pdf	Hearsay
3708	undated	134_Hesse_Accession.pdf	Hearsay
3709	undated	135_Tiepolo_Women_Darius.pdf	Hearsay
3710	undated	136_Chase_Whistling.pdf	Hearsay
3711	undated	137_Bernini_Triton_Sea_Serpent.pdf	Hearsay
3712	undated	138_Bernini_Triton_Shell.pdf	Hearsay
3713	undated	139_Prendergast_Promenade.pdf	Hearsay
3714	undated	140_Chardin_Still_Life.pdf	Hearsay
3715	undated	141_Hassam_Centrale.pdf	Hearsay
3716	undated	142_Ruysch_Flowers.pdf	Hearsay
3717	undated	143_Sisley_Church.pdf	Hearsay
3718	undated	144_Kokoschka_Elbe.pdf	Hearsay
3719	undated	145_Ter_Borch_Young.pdf	Hearsay
3720	undated	145_Tintoretto_Dreams.pdf	Hearsay
3721	undated	146_Poussin_Holy.pdf	Hearsay
3722	undated	148_Picasso_Sylvette.pdf	Hearsay
3723	undated	149_Cezanne_Head.pdf	Hearsay
3724	undated	150_West_Death.pdf	Hearsay
3725	undated	151_Panini_Interior_St_Peter's.pdf	Hearsay
3726	undated	152_Copley_George.pdf	Hearsay
3727	undated	153_Cassatt_Alexander.p	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		df	
3728	undated	154_Kirchner_Coastal.pdf	Hearsay
3729	undated	155_Copley_Clark.pdf	Hearsay
3730	undated	157_Ruisdael_Farm.pdf	Hearsay
3731	undated	158_Mount_Banjo.pdf	Hearsay
3732	undated	159_Degas_Morning_Ride.pdf	Hearsay
3733	undated	160_Osservanza_Lucy.pdf	Hearsay
3734	undated	161_Arenberg.pdf	Hearsay
3735	undated	162_Sloan_Wake.pdf	Hearsay
3736	undated	163_Cezanne_Skull_Book.pdf	Hearsay
3737	undated	164_Chamberlian_Coo.pdf	Hearsay
3738	undated	165_Ruisdael_Wooded.pdf	Hearsay
3739	undated	166_Degas_Dancers.pdf	Hearsay
3740	undated	167_Motherwell_Elegy.pdf	Hearsay
3741	undated	168_Millais_Leisure.pdf	Hearsay
3742	undated	169_Sargent_Home_Fields.pdf	Hearsay
3743	undated	170_Cassatt_Women_Admiring.pdf	Hearsay
3744	undated	171_Flavin_Tatlin.pdf	Hearsay
3745	undated	172_Sargent_Poirson.pdf	Hearsay
3746	undated	173_Henri_Young.pdf	Hearsay
3747	undated	174_Sloan_McSorley.pdf	Hearsay
3748	undated	175_deChirico_Gladiators.pdf	Hearsay
3749	undated	176_Eakins_Horatio.pdf	Hearsay
3750	undated	177_Hartley_Penobscot.pdf	Hearsay
3751	undated	178_Frankenthaler_Bay.pdf	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3752	undated	179_Copley_George_Lewis.pdf	Hearsay
3753	undated	180_Rivera_Edsel.pdf	Hearsay
3754	undated	181_Mueller_Bathers.pdf	Hearsay
3755	undated	182_Chase_Yield.pdf	Hearsay
3756	undated	183_Ernst_Moonmad.pdf	Hearsay
3757	undated	184_Copley_Gray.pdf	Hearsay
3758	undated	185_Copley_Loring.pdf	Hearsay
3759	undated	186_Copley_Montresor.pdf	Hearsay
3760	undated	188_Tiepolo_Joseph.pdf	Hearsay
3761	undated	189_Copley_Hallowell.pdf	Hearsay
3762	undated	190_Gabo_Linear.pdf	Hearsay
3763	undated	192_Degas_Portrait_Woman.pdf	Hearsay
3764	undated	194_Nolde_Sunflowers.pdf	Hearsay
3765	undated	195_Renoir_Clearing.pdf	Hearsay
3766	undated	197_Ricci_Miraculous.pdf	Hearsay
3767	undated	199_Artschwager_Hospital.pdf	Hearsay
3768	undated	201_Matisse_Seated_Nude.pdf	Hearsay
3769	undated	202_Tiburtine_Crucifixion.pdf	Hearsay
3770	undated	203_Indiana_Brooklyn.pdf	Hearsay
3771	undated	204_Rodin_Bronze.pdf	Hearsay
3772	undated	205_Carpeaux_Genius the 1983.16.pdf	Hearsay
3773	undated	206_Carpeaux_Genius_1992.223.pdf	Hearsay
3774	undated	207_Robbia_Madonna.pdf	Hearsay
3775	undated	210_Gerhard_Hebe.pdf	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3776	undated	211_Kaendler_Postmaster.pdf	Hearsay
3777	undated	212_Copley_Negro.pdf	Hearsay
3778	undated	213_Robbia_Head_Youth.pdf	Hearsay
3779	undated	214_Rude_Departure.pdf	Hearsay
3780	undated	215_Ingres_Mlle_Cecile.pdf	Hearsay
3781	undated	216_Degas_Bandage.pdf	Hearsay
3782	undated	217_Henri_Beach_Hat.pdf	Hearsay
3783	undated	218_Seated_Woman_Wiping.pdf	Hearsay
3784	undated	219_Sargent_Gautier.pdf	Hearsay
3785	undated	220_Schmidt_Cactus.pdf	Hearsay
3786	undated	221_Sidaner_Tea_Table.pdf	Hearsay
3787	undated	222_Copley_Mountfort.pdf	Hearsay
3788	undated	224_Degas_Seated_Nude.pdf	Hearsay
3789	undated	225_Magnasco_Satire.pdf	Hearsay
3790	undated	226_Rivera_Tannahill.pdf	Hearsay
3791	undated	227_Lagrenee_Pygmalion.pdf	Hearsay
3792	undated	228_Demuth_Still_Life_Apples.pdf	Hearsay
3793	undated	229_Gerome_Seated_Woman.pdf	Hearsay
3794	undated	230_Lebasque_Balcony.pdf	Hearsay
3795	undated	232_Rosa_Moses.pdf	Hearsay
3796	undated	238_Berckheyde_Interior_Grote.pdf	Hearsay
3797	undated	239_Ballet_Dancer_Adjus	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		ting.pdf	
3798	undated	240_Beckmann_Sacrificial.pdf	Hearsay
3799	undated	242_Cucchi_Quadro.pdf	Hearsay
3800	undated	244_Renoir_Country.pdf	Hearsay
3801	undated	245_Gauguin_Petite.pdf	Hearsay
3802	undated	247_Sheeler__Wheels.pdf	Hearsay
3803	undated	248_Durer_Adam.pdf	Hearsay
3804	undated	251_Whistler_Studio.pdf	Hearsay
3805	undated	252_Lastman_David.pdf	Hearsay
3806	undated	254_Peale_James.pdf	Hearsay
3807	undated	255_Rivera_Tannahill.pdf	Hearsay
3808	undated	256_Estes_42nd_Street.pdf	Hearsay
3809	undated	257_Whistler_Violet.pdf	Hearsay
3810	undated	258_Rodin_Aime_Jules.pdf	Hearsay
3811	undated	261_Carpeaux_Ugolinio.pdf	Hearsay
3812	undated	262_Rodin_Vase.pdf	Hearsay
3813	undated	264_Peale_Self.pdf	Hearsay
3814	undated	265_Degas_Dancer_Adjusting.pdf	Hearsay
3815	undated	267_Schnabel_Cabalistic.pdf	Hearsay
3816	undated	268_Whistler_Barr.pdf	Hearsay
3817	undated	270_Copley_Pitts.pdf	Hearsay
3818	undated	271_Lambdin_Front.pdf	Hearsay
3819	undated	272_Checker.pdf	Hearsay
3820	undated	273_Degas_Spanish.pdf	Hearsay
3821	undated	274_Estes_Blue.pdf	Hearsay
3822	undated	280_Degas_Schoolgirl.pdf	Hearsay
3823	undated	282_Rivera_Meal.pdf	Hearsay
3824	undated	283_Rodin_Balzac.pdf	Hearsay
3825	undated	284_Carpeaux_Fisherboy.	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		pdf	
3826	undated	286_Rembrandt_Lutma.pdf	Hearsay
3827	undated	287_Degas_Circus.pdf	Hearsay
3828	undated	288_Lee_Smith_Piper.pdf	Hearsay
3829	undated	289_Carpeaux_Fumeur.pdf	Hearsay
3830	undated	294_Rembrandt_Christ_Sick.pdf	Hearsay
3831	undated	297_Bellows_Stag.pdf	Hearsay
3832	undated	298_Renoir_Blanchisseuse.pdf	Hearsay
3833	undated	299_Lambdin_Roses.pdf	Hearsay
3834	undated	300_Bingham_Quincy.pdf	Hearsay
3835	undated	302_Rembrandt_Presentation_Temple.pdf	Hearsay
3836	undated	303_Rembrandt_Goldweigher's.pdf	Hearsay
3837	undated	304_Self_Portrait_Saskia.pdf	Hearsay
3838	undated	305_Bramer_Adoration.pdf	Hearsay
3839	undated	306_Rembrandt_Descent.pdf	Hearsay
3840	undated	308_Cezanne_Slave.pdf	Hearsay
3841	undated	309_Rembrandt_Abraham.pdf	Hearsay
3842	undated	310_Rembrandt_Squre_Tower.pdf	Hearsay
3843	undated	312_Rembrandt_Samaria.pdf	Hearsay
3844	undated	313_Rembrandt_Old_Man.pdf	Hearsay
3845	undated	314_Rembrandt_Old_Man_Shading.pdf	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3846	undated	316_Rembrandt_Death_Virgin.pdf	Hearsay
3847	undated	317_Rembrandt_Medea.pdf	Hearsay
3848	undated	318_Rembrandt_Medea.pdf	Hearsay
3849	undated	319_Rembrandt_Three_Heads.pdf	Hearsay
3850	undated	323_Simpson_Bathroom.pdf	Hearsay
3851	undated	324_Rodin_Baudelaire.pdf	Hearsay
3852	undated	325_Rembrandt_Adoration.pdf	Hearsay
3853	undated	326_Rembrandt_Arbour.pdf	Hearsay
3854	undated	327_Rembrandt_Velvet_Plume.pdf	Hearsay
3855	undated	328_Rembrandt_Clasp.pdf	Hearsay
3856	undated	332_Rembrandt_Velvet_Plume.pdf	Hearsay
3857	undated	333_Rembrandt_Angel_Shepherds_2001.1.pdf	Hearsay
3858	undated	334_Rembrandt_Divided.pdf	Hearsay
3859	undated	335_Rembrandt_Asselyn.pdf	Hearsay
3860	undated	336_Angel_Shepherds.pdf	Hearsay
3861	undated	337_Rubens_Catherine.pdf	Hearsay
3862	undated	338_Rembrandt_Abraham_Hagar.pdf	Hearsay
3863	undated	339_Rembrandt_Money_Changers.pdf	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3864	undated	340_Rembrandt_Money_Changers.pdf	Hearsay
3865	undated	341_Simpson_Coiffure.pdf	Hearsay
3866	undated	343_Rembrandt_Golf.pdf	Hearsay
3867	undated	344_Rembrandt_Bust.pdf	Hearsay
3868	undated	345_Brown_Filatrice.pdf	Hearsay
3869	undated	346_Rembrandt_Self_Portrait_Cap_Scarf.pdf	Hearsay
3870	undated	347_Rembrandt_Joseph.pdf	Hearsay
3871	undated	348_Rembrandt_Old_Man_Shading.pdf	Hearsay
3872	undated	349_Whistler_Kitchen.pdf	Hearsay
3873	undated	351_Rembrandt_Prodigal.pdf	Hearsay
3874	undated	352_Rembrandt_Presentation_09.1S936.pdf	Hearsay
3875	undated	354_Rembrandt_Tribute.pdf	Hearsay
3876	undated	355_Rembrandt_Mordecai.pdf	Hearsay
3877	undated	356_Rembrandt_Thieves.pdf	Hearsay
3878	undated	357_Rembrandt_Samaria.pdf	Hearsay
3879	undated	358_Rembrandt_Tomb.pdf	Hearsay
3880	undated	359_Rembrandt_Mother.pdf	Hearsay
3881	undated	361_Rembrandt_Flight.pdf	Hearsay
3882	undated	362_Rembrandt_Velvet_Cloak.pdf	Hearsay
3883	undated	363_Rembrandt_Circumci	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		sion.pdf	
3884	undated	364_Rembrandt_Doctors.pdf	Hearsay
3885	undated	365_Rembrandt_Lazarus.pdf	Hearsay
3886	undated	366_Rembrandt_Clouds.pdf	Hearsay
3887	undated	367_Rembrandt_Bearded_Man.pdf	Hearsay
3888	undated	369_Rembrandt_Jerome.pdf	Hearsay
3889	undated	370_Studies_Saskia.pdf	Hearsay
3890	undated	371_Rembrandt_Peasant_High_Cap.pdf	Hearsay
3891	undated	372_Rembrandt_Rest_Night.pdf	Hearsay
3892	undated	374_Sloan_Night_Windows.pdf	Hearsay
3893	undated	375_Rembrandt_Beheading.pdf	Hearsay
3894	undated	376_Weems_Manet.pdf	Hearsay
3895	undated	378_Rembrandt_Stephen.pdf	Hearsay
3896	undated	379_Rembrandt_Baptism_Eunuch.pdf	Hearsay
3897	undated	380_Rembrandt_Bathers.pdf	Hearsay
3898	undated	381_Rembrandt_Samuel.pdf	Hearsay
3899	undated	382_Rembrandt_Samuel.pdf	Hearsay
3900	undated	383_Sloan_Connoisseurs.pdf	Hearsay
3901	undated	384_Sloan_Woman's_Page.pdf	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3902	undated	385_Sloan_Prone.pdf	Hearsay
3903	10/28/2011	A_Bouquet_of_Offerings_to_Test_Uncertain_Waters.pdf	Hearsay
3904	11/28/2006	Antiquities_sold_to_pay_for_new_art_bonanza.pdf	Hearsay
3905	5/2/2004	Art__Banking_on_big_names__More_than_$500_million_worth_of_art_is_up_for_auction_in_New_York.pdf	Hearsay
3906	11/1/2007	Christie's_is_Cagey_about_Maier_Museum_Provenance,_Discloses_the_Rose.pdf	Hearsay
3907	2/1/2011	Cleveland_Museum_of_Art_earns_more_than_expected_from_Sotheby.pdf	Hearsay
3908	1/15/2011	Cleveland_Museum_of_Art_to_auction_32_old_master_paintings_at_Sotheby's.pdf	Hearsay
3909	5/12/2004	Contemporary-Art_Bidding_Tops_$102_Million_in_Sales.pdf	Hearsay
3910	7/15/2014	I_look_at_artists_like_a_commodity_balance_sheet__art_dealer_Olyvia_Kwok_on_picking_paintings_and_being_sued_by_Sotheby's_.pdf	Hearsay
3911	9/4/2012	Market_Barometer__Old_Master_Paintings,_Spring_2012___Special_Features___Christie's.pdf	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
3912	10/19/2011	MoMA_To_Sell_Tamayo,_With_Acquisition_Policy_Implications.pdf	Hearsay
3913	6/27/2001	Museum_pieces_auctioned___De_Young,_Legion_items_get_top_dollar.pdf	Hearsay
3914	10/1/1998	Museum_Provenance.pdf	Hearsay
3915	2/2/2014	Prolific_Fort_Worth_Civil_War_collector_scoops_up_rare_Robert_E._Lee_items.pdf	Hearsay
3916	9/14/2012	Vase_used_as_doorstop_raises_$1.3m_at_auction.pdf	Hearsay
3917	12/21/2001	Yard_Sales_of_the_Gods.pdf	Hearsay
3918	2003	All_About_Appraising_2003_p219.pdf	Hearsay
3919	2013	Appraising_Art_2013_p438.pdf	Hearsay
3920	undated	James_Callahan_comps_reliance.pdf	Hearsay
3921	undated	Jason_Christian_comps_reliance.pdf	Hearsay
3922	undated	Jason_Christian_Sheeler.pdf	Hearsay
3923	2/20/1920	DMA Minutes	No Objection
3924	Sept. 2005	Investable Art Insight 2005	Hearsay
3925	2011	ARTVEST Partners; Art Market Update - The Return of the Bull and the Ascendancy of China	Hearsay
3926	2011	ARTVEST Partners; Art Market Update -	Hearsay

EXHIBIT NO.	DATE	DESCRIPTION	CITY AND RETIREE COMMITTEE OBJECTIONS
		Contemporary Collectors Unswayed by Market Hype	
3927	5/15/2012	ARTVEST; Art as an Investment: The Fundamentals	Hearsay

ATTACHMENT F

THE DWSD PARTIES' CONSOLIDATED
(1) WITNESS LIST AND (2) EXHIBIT LIST

The DWSD Parties submit the following Consolidated (1) Witness List and (2) Exhibit List for the confirmation hearing on the Plan:

I. Witness List

1. The DWSD Parties identify the following individuals, exclusive of those to be offered for rebuttal purposes, as live witnesses that they will call at the confirmation hearing on the Plan:

   a. Lawrence J. Bell, Vice President, U.S. Bank (Fact Witness)

   b. Adam T. Bergonzi, Managing Director & Chief Risk Officer, National Public Finance Guarantee Corporation (Fact Witness)

   c. Joseph Centofanti, CPA, Partner, CohnReznick LLP (Expert Witness)

   d. Francis J. Coughlin, Jr., Deputy Chief Surveillance Officer, Public Finance, Assured Guaranty Municipal Corporation (Fact Witness)

   e. William E. Oliver, Independent Consultant (Expert Witness)

   f. Nathaniel Singer, Managing Director, Swap Financial Group (Expert Witness)

   g. Thomas S. Terry, Chief Executive Officer, The Terry Group (Expert Witness)

2. The DWSD Parties identify the following individual, exclusive of those to be offered for rebuttal purposes, as a live witness that they may call at the confirmation hearing on the Plan:

a. John S. Young, Jr., Owner and Member, John S. Young, Jr., LLC (Expert Witness)

3. The DWSD Parties identify the following individuals, exclusive of those to be offered for rebuttal purposes, who may be called as witnesses via deposition testimony for the confirmation hearing on the Plan:

a. Nicolette Bateson, Chief Financial Officer, Detroit Water and Sewerage Department (Fact Witness)

b. Bart Foster, The Foster Group (Fact Witness)

c. Sue McCormick, Director/Chief Executive Officer, Detroit Water and Sewerage Department (Fact Witness)

d. Cheryl Porter, Chief Operating Officer, Detroit Water and Sewerage Department (Fact Witness)

e. Judith Ann Kermans, Gabriel Roder Smith & Company (Fact Witness)

f. Vito Kaunelis, Principal, OHM Advisors (Fact Witness)

g. Cynthia Thomas, Executive Director, Retirement Systems (Fact Witness)

II. Exhibit List - DWSD Parties' Exhibit Lists and Plan Supporters' Objections

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11001	5/14/2014	P0A00442993	P0A00443014	CDM Smith - Water Master Plan Update, dated May 14, 2014	No Objection	
DWSD Parties	11002		POA00214164	POA00214164	City of Detroit, Detroit Water and Sewer Department, Sewer System Revenue Projections	No Objection	
DWSD Parties	11003	9/1/2012	POA00063740	POA00063818	Competitive Assessment and Gap Analysis, dated September 2012 [McCormick Ex. 12]	No Objection	
DWSD Parties	11004	10/2/2013	POA00107044	POA00107116	Detroit Water & Sewer Department, 10-Year Business Plan, dated October 2, 2013	No Objection	
DWSD Parties	11005	9/1/2013	POA00705745	POA00706414	Detroit Water and Sewerage Department, 2013 Needs Assessment for the Detroit Collection Systems and WWTP, dated September 2013	No Objection	
DWSD Parties	11006		POA00070897	POA00070898	Detroit Water and Sewerage Department, Capital Financing [McCormick Ex. 26]	No Objection	
DWSD Parties	11007	9/24/2013	POA00385281	POA00385326	Draft DWSD 10-Year CIP, dated September 24, 2013] [Porter Ex. 2]	No Objection	
DWSD Parties	11008	11/18/2013	POA00321876	POA00321876	DWSD CIP Comparison - January 2103 vs January 2014 ($ millions) [Porter Ex. 6]	No Objection	
DWSD Parties	11009	7/17/2014			Feasibility Report, The Foster Group, dated July 17, 2014 [Bateson Ex. 6]	No Objection	
DWSD Parties	11010	12/13/2013	POA00273335	POA273344	Foster Group memorandum re: FY 2014-15 Budget and Financial Plan, December 13, 2013	No Objection	
DWSD Parties	11011		AGMC-NFPG-EXP_00002871	AGMC-NFPG-EXP_00002910	FY 2015 Sewage Disposal System Capital Improvement Program, available at: http://dwsd.org/pages_n/systems_plans.html	No Objection	
DWSD Parties	11012	12/18/2013	AGMC-NFPG-EXP_00000006	AGMC-NFPG-EXP_00002910	FY 2015 Sewage Disposal System Capital Improvement Program, dated December 18, 2013	No Objection	
DWSD Parties	11013	12/18/2013	AGMC-NFPG-EXP_00000045	AGMC-NFPG-EXP_00000086	FY 2015 Water Supply System Capital Improvement Program, dated December 18, 2013	No Objection	
DWSD Parties	11014	1/22/2013	POA00272938	POA00272940	Memorandum from The Foster Group, dated January 22, 2013 [McCormick Ex. 17]	No Objection	
DWSD Parties	11015	9/24/2013	POA00002851	POA00002896	OHM Advisors, DWSD 10-Year CIP: An Independent Estimate of the 10-Year Capital Improvement Plan, dated September 24, 2013	No Objection	
DWSD Parties	11016	3/10/2014	POA00249261	POA00249266	Outline of DWSD Responses to Public Comments re: Proposed FY 2014-15 Water and Sewer Rates, dated March 10, 2014	No Objection	
DWSD Parties	11017	12/20/2013	POA00013855	POA00013912	Report on: Response to DWSD 10-Year Capital Improvement Plan, December 20, 2013 (ITWG Report)	Hearsay	
DWSD Parties	11018	12/20/2011			City of Detroit, Michigan $500,675,000 Water Supply System Revenue Senior Lien Bonds, Series 2011-A, -B, and -C, Official Statement	No Objection	
DWSD Parties	11019	6/20/2012	AGM0006299	AGM0006623	City of Detroit, Michigan, $659,780,000 Sewage Disposal System, Revenue and Revenue Refunding Senior Lien Bonds, Series 2012A, Official Statement	No Objection	
DWSD Parties	11020	10/28/1993			Closing Transcripts, Series 1993 Water Bonds	No Objection	
DWSD Parties	11021	8/13/1997			Closing Transcripts, Series 1997-A Water Bonds	No Objection	
DWSD Parties	11022	12/10/1998			Closing Transcripts, Series 1998(A), 1998(B) Sewer Bonds	No Objection	
DWSD Parties	11023	12/20/1999			Closing Transcripts, Series 1999(A) Sewer Bonds	No Objection	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11024	10/23/2001			Closing Transcripts, Series 2001(B), 2001(C-2) Sewer Bonds	No Objection	
DWSD Parties	11025		AGM0016970	AGM0018677	Closing Transcripts, Series 2001(C-1) Sewer Bonds	No Objection	
DWSD Parties	11026	10/23/2001			Closing Transcripts, Series 2001(D) Sewer Bonds	No Objection	
DWSD Parties	11027	5/23/2001			Closing Transcripts, Series 2001-A, 2001-B Water Bonds	No Objection	
DWSD Parties	11028		AGM0001374	AGM0002848	Closing Transcripts, Series 2003(A) Sewer Bonds	No Objection	
DWSD Parties	11029		AGM0002849	AGM0004323	Closing Transcripts, Series 2003(B) Sewer Bonds	No Objection	
DWSD Parties	11030	1/30/2003			Closing Transcripts, Series 2003-A, 2003-B, 2003-C Water Bonds	No Objection	
DWSD Parties	11031	2/6/2003			Closing Transcripts, Series 2003-D Water Bonds	No Objection	
DWSD Parties	11032		AGM0004324	AGM0004903	Closing Transcripts, Series 2004(A) Sewer Bonds	No Objection	
DWSD Parties	11033	5/13/2004			Closing Transcripts, Series 2004-A, 2004-B Water Bonds	No Objection	
DWSD Parties	11034	3/17/2005			Closing Transcripts, Series 2005(A), 2005(B) Sewer Bonds	No Objection	
DWSD Parties	11035	4/5/2005			Closing Transcripts, Series 2005(C) Sewer Bonds	No Objection	
DWSD Parties	11036	3/23/2005			Closing Transcripts, Series 2005-A, 2005-C Water Bonds	No Objection	
DWSD Parties	11037		AGM0009231	AGM0010739	Closing Transcripts, Series 2006(A) Water Bonds	No Objection	
DWSD Parties	11038	8/10/2006			Closing Transcripts, Series 2006(A), 2006(B), 2006(C) Sewer Bonds	No Objection	
DWSD Parties	11039		AGM0010745	AGM0012253	Closing Transcripts, Series 2006(B) Water Bonds	No Objection	
DWSD Parties	11040		AGM0013083	AGM0014591	Closing Transcripts, Series 2006(C) Water Bonds	No Objection	
DWSD Parties	11041		AGM0004904	AGM0005609	Closing Transcripts, Series 2006(D) Sewer Bonds	No Objection	
DWSD Parties	11042		AGM0014597	AGM0016105	Closing Transcripts, Series 2006(D) Water Bonds	No Objection	
DWSD Parties	11043		AGM0008024	AGM0009230	Closing Transcripts, Series 2012(A) Sewer Bonds	No Objection	
DWSD Parties	11044	6/1/2012	POA00000089	POA00000124	Trust Indenture Among the City of Detroit, Detroit Water and Sewerage Department and U.S. Bank National Association as Trustee Relating to the Outstanding Secured Obligations of the Detroit Water and Sewerage Department (Sewage Disposal System)	No Objection	
DWSD Parties	11045	2/1/2013	POA00014120	POA00014155	Trust Indenture Among the City of Detroit, Detroit Water and Sewerage Department and U.S. Bank National Association as Trustee Relating to the Outstanding Secured Obligations of the Detroit Water and Sewerage Department (Water Supply System)	No Objection	
DWSD Parties	11046	4/23/2014			Article from Yahoo Finance "Detroit CFO says post-bankruptcy oversight critical for city" by Reuters, published April 23, 2014 [Hill Ex. 5]	Hearsay	
DWSD Parties	11047	6/30/2002	AGMC-NFPG-EXP_00003067	AGMC-NFPG-EXP_00003215	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2002	No Objection	
DWSD Parties	11048	6/30/2003	AGMC-NFPG-EXP_00003216	AGMC-NFPG-EXP_00003378	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2003	No Objection	
DWSD Parties	11049	6/30/2004	AGMC-NFPG-EXP_00003379	AGMC-NFPG-EXP_00003556	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2004	No Objection	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11050	6/30/2005	AGMC-NFPG-EXP_00003557	AGMC-NFPG-EXP_00003735	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2005	No Objection	
DWSD Parties	11051	6/30/2006			City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2006	No Objection	
DWSD Parties	11052	6/30/2007	AGMC-NFPG-EXP_00003736	AGMC-NFPG-EXP_00003951	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2007	No Objection	
DWSD Parties	11053	6/30/2008	AGMC-NFPG-EXP_00003952	AGMC-NFPG-EXP_00004175	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2008	No Objection	
DWSD Parties	11054	6/30/2009	AGMC-NFPG-EXP_00004176	AGMC-NFPG-EXP_00004396	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2009	No Objection	
DWSD Parties	11055	6/30/2010	AGMC-NFPG-EXP_00004397	AGMC-NFPG-EXP_00004633	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2010	No Objection	
DWSD Parties	11056	6/30/2011	AGMC-NFPG-EXP_00004634	AGMC-NFPG-EXP_00004869	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2011	No Objection	
DWSD Parties	11057	6/30/2012	AGMC-NFPG-EXP_00004870	AGMC-NFPG-EXP_00005114	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2012	No Objection	
DWSD Parties	11058		AGM0009271	AGM0009281	City Ordinance No. 01-05	No Objection	
DWSD Parties	11059		AGM0004927	AGM0004960	City Ordinance No. 18-01	No Objection	
DWSD Parties	11060	6/30/2013			Comprehensive Annual Financial Report For the Fiscal Year Ended June 30, 2013 (248 pages)	No Objection	
DWSD Parties	11061	3/27/2014	POA00557442	POA00557447	Email communication dated March 27, 2014 [Hill Ex. 4]	Hearsay	
DWSD Parties	11062	4/2/2014	MCOPW00117 30	MCOPW00117 40	Email from Richard P. Sulaka to William Misterovich, Craig Hupp, Allan Brilliant, Stephen Wolpert, Deanna Fanelli, Fwd: FW: Office of the Emergency Manager/Letter to Counties	No Objection	
DWSD Parties	11063	12/30/2013			Emergency Manager Order No. 20: Order Restoring the Salary and Benefits of the Mayor and Adopting the Agreement Between the Emergency Manager and Mayor Duggan Concerning Delegation of Authority and Transition Protocols [Duggan Ex. 1]	No Objection	
DWSD Parties	11064	7/28/2014			Emergency Manager Order No. 31: Order Supplementing Order No. 20 [Duggan Ex. 11]	No Objection	
DWSD Parties	11065	1/23/2014	POA00126409	POA00126410	Letter from John Hill to cgannon@conwaymackenzie.com and Gkushiner@conwaymackenzie.com, Fwd: Mayor's characterization of the Plan of Adjustment [Duggan Ex. 7]	Hearsay [Duplicate of 11066]	
DWSD Parties	11066		POA00126409	POA00126410	Letter from John Hill to cgannon@conwaymackenzie.com and Gkushiner@conwaymackenzie.com, Fwd: Mayor's characterization of the Plan of Adjustment [Hill Ex. 6]	Hearsay [Duplicate of 11065]	
DWSD Parties	11067	8/7/2013	POA00170300	POA00170301	Letter from Kevyn Orr to Shani Penn and Sonya Mays, Re: Follow ups from last week [Moore Ex. 3]	Hearsay	
DWSD Parties	11068		AGM0004911	AGM0004926	Revenue Bond Act of 1933, Act 94 of 1933	No Objection	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11069	2/1/2014	AGMC-NFPG-EXP_00000332		Triennial Executive Budget, FY 2015 through FY 2017, City of Detroit, Michigan (February 2014)	No Objection	
DWSD Parties	11070	2/18/2014	POA00216877	POA00216880	Agenda Item #5C, City of Detroit Water & Sewerage Department Financial Services Group, dated February 18, 2014 [McCormick Ex. 14]	No Objection	
DWSD Parties	11071	8/8/2012			August 8, 2012 EMA Presentation by Director Sue McCormick, available at: http://www.dwsd.org/downloads_n/about_dwsd/ema/ema_presentation_08082012.pdf	No Objection	
DWSD Parties	11072	1/13/2014	POA00064481	POA00064539	Binder for January 13, 2014 Finance Committee Meeting	No Objection	
	11073						
DWSD Parties	11074	4/9/2014	POA00337327	POA00337382	Board of Water Commissioners Agenda Items, dated April 9, 2014 [Donner Ex. 1]	No Objection	
DWSD Parties	11075	7/14/2014			Board of Water Commissioners Finance Committee Agenda, dated July 14, 2014 [Bateson Ex. 7]	No Objection	
DWSD Parties	11076	6/17/2014			Board of Water Commissioners Finance Committee Agenda, dated June 17, 2014 [Foster Ex. 8]	No Objection	
DWSD Parties	11077	1/7/2014			Board of Water Commissioners Workshop on Proposed FY 2014-15 Budget and Financial Plan presentation, dated January 7, 2014, available at: http://www.dwsd.org/downloads_n/about_dwsd/bowc/presentations/2014-01-07/bowc_workshop_fy2014-2015_budget_presentation_final_2014-01-07.pdf	No Objection	
DWSD Parties	11078	1/13/2014	OAK0029471	OAK0029529	BOWC Finance Committee Agenda, dated January 13, 2014	No Objection	
DWSD Parties	11079	10/7/2013	POA00072912	POA00072964	BOWC Finance Committee Agenda, dated October 7, 2013	No Objection	
DWSD Parties	11080	6/30/2012	POA00245504	POA00245541	City of Detroit Sewage Disposal Fund Basic Financial Statements, dated June 30, 2012 [Hill Ex. 3]	No Objection	
DWSD Parties	11081	6/30/2008	POA00245352	POA00245392	City of Detroit Sewage Disposal Fund, Basic Financial Statements and Required Supplementary Information, dated June 30, 2008	No Objection	
DWSD Parties	11082	6/30/2010	POA00245432	POA00245467	City of Detroit Sewage Disposal Fund, Basic Financial Statements and Required Supplementary Information, dated June 30, 2010	No Objection	
DWSD Parties	11083	6/30/2009	POA00245393	POA00245431	City of Detroit Sewage Disposal Fund, Basic Financial Statements, dated June 30, 2009	No Objection	
DWSD Parties	11084	6/30/2011	POA00245468	POA00245503	City of Detroit Sewage Disposal Fund, Basic Financial Statements, dated June 30, 2011	No Objection	
DWSD Parties	11085	6/30/2012	POA00245504	POA00245541	City of Detroit Sewage Disposal Fund, Basic Financial Statements, dated June 30, 2012	No Objection	
	11086						
DWSD Parties	11087	6/30/2008	POA00245542	POA00245581	City of Detroit Water Fund, Basic Financial Statements and Required Supplementary Information, dated June 30, 2008	No Objection	
DWSD Parties	11088	6/30/2009	POA00245582	POA00245619	City of Detroit Water Fund, Basic Financial Statements, dated June 30, 2009	No Objection	
DWSD Parties	11089	6/30/2010	POA00245620	POA00245655	City of Detroit Water Fund, Basic Financial Statements, dated June 30, 2010	No Objection	
DWSD Parties	11090	6/30/2011	POA00245656	POA00245692	City of Detroit Water Fund, Basic Financial Statements, dated June 30, 2011	No Objection	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11091	6/30/2012	POA00245693	POA00245728	City of Detroit Water Fund, Basic Financial Statements, dated June 30, 2012	No Objection	
DWSD Parties	11092	6/30/2012	POA00245504	POA00245541	City of Detroit, Sewage Disposal Fund, Basic Financial Statements (With Independent Auditors' Report Thereon) [Hill Ex. 3]	No Objection	
DWSD Parties	11093		POA0036947	P0A00369490	Combined Water and Sewer Financial Reports	No Objection	
DWSD Parties	11094	8/4/2011	AGMC-NFPG-EXP_00002779	AGMC-NFPG-EXP_00002780	Detroit Water & Sewerage Department, Fact Sheet, dated August 4, 2011, available at: http://www.dwsd.org/downloads_n/customer_service/	No Objection	
DWSD Parties	11095	2013	AGMC-NFPG-EXP_00002855	AGMC-NFPG-EXP_00002870	Detroit Water & Sewerage Department, Wastewater Treatment Plant Permit No. MI0022802, Fact Sheet (2013), available at: http://www.michigan.gov/documents/deq/deq-wrd-npdes-DetroitWWTP_FS_415425_7.pdf	No Objection	
DWSD Parties	11096	5/8/2013	MCOPW006093	MCOPW006099	Detroit Water and Sewerage Department Finance Division Memorandum to All DWSD Customers, dated May 8, 2013 [McCormick Ex. 15]	No Objection	
DWSD Parties	11097						
DWSD Parties	11098						
DWSD Parties	11099						
DWSD Parties	11100						
DWSD Parties	11101						
DWSD Parties	11102	3/15/2013	OAK0009250	OAK0009372	Director's Compliance Report, dated March 15, 2013 [McCormick Ex. 25]	No Objection	
DWSD Parties	11103	6/10/2014			DWSD Fact Sheet, available at: http://www.dwsd.org/downloads_n/about_dwsd/fact sheet/dwsd_fact_sheet.pdf	No Objection	
DWSD Parties	11104	11/1/2012	MCOPW002558	MCOPW00255 61	DWSD Financial Performance Report, dated November 2012 [McCormick Ex. 16]	No Objection	
DWSD Parties	11105	6/24/2014			DWSD Press Release dated June 24, 2014, available at: http://www.dwsd.org/downloads_n/announcements/press_releases/0624_FINAL_DWSD_Response_Re_Shut_Offs.pdf	No Objection	
DWSD Parties	11106	5/22/2013	POA00407385	POA00407423	Email from Mark Somers to James George, copy Feda Wang re: GS DWSD Materials	Hearsay	
DWSD Parties	11107		POA00216883		Historical Water Sales and Billed Sewer Volumes	No Objection	
DWSD Parties	11108	6/30/2013			City of Detroit Sewer Fund, Basic Financial Statements, dated June 30, 2013	No Objection	
DWSD Parties	11109	6/30/2013			City of Detroit Water Fund, Basic Financial Statements, dated June 30, 2013	No Objection	
DWSD Parties	11110	2/28/2014	POA00424181	POA00414185	Letter from Bart Foster to Nicolette Bateson, Fwd: Prior Forecast [Foster Ex. 3]	No Objection	
DWSD Parties	11111	6/22/2012	POA00414943	POA00415028	Letter from Nicholas Foster to Bart Foster and Tatjana Misulic, Re: OS Tables [Foster Ex. 1]	No Objection	
DWSD Parties	11112	4/1/2014	POA00337557	POA00337559	Letter from Nicholette Bateson to Bart Foster, Re: Sorry - the complete files are here [Foster Ex. 2]	No Objection	
DWSD Parties	11113	5/28/2014	AGMC-NFPG-EXP_00000045	AGMC-NFPG-EXP_00000086	Letter from Sue F. McCormick to Detroit Board of Water Commissioners, re: Director's Report - May 2014	No Objection	
DWSD Parties	11114	6/27/2012	MCOPW006064	MCOPW006075	Letter from Sue F. McCormick to Board of Water Commissioners [McCormick Ex. 29]	No Objection	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11115	1/21/2014	MCOPW006045	MCOPW006052	Letter from Sue McCormick to Board of Water Commissioners	No Objection	
DWSD Parties	11116	2/26/2014	OAK0001079	OAK0001088	Letter from Sue McCormick to Board of Water Commissioners	No Objection	
DWSD Parties	11117	3/27/2013	MCOPW006077	MCOPW006080	Letter from Sue McCormick to Board of Water Commissioners	No Objection	
DWSD Parties	11118	6/27/2012	MCOPW006064	MCOPW006075	Letter from Sue McCormick to Board of Water Commissioners (including attachment)	No Objection	
DWSD Parties	11119	11/21/2013	POA00248975	POA00248975	Letter from William M. Wolfson to Honorable Legal Committee, re: Request for Recommendation Relative to Implementing Rate Simplification in DWDS's Wholesale Wastewater Disposal Services Contracts, dated November 21, 2013	No Objection	
DWSD Parties	11120	2/18/2014	POA00216877	POA00216880	Memorandum from Nicolette Bateson to Board of Water Commissioners Finance Committee, re: Preliminary FY 2013 Unaudited Results, dated February 18, 2014	No Objection	
DWSD Parties	11121	11/5/2013	POA00219643	POA00219653	Memorandum from Rate Simplification Work Group to Board of Water Commissioners, re: Rate Simplification Overview of Recommendations, dated November 5, 2013	No Objection	
DWSD Parties	11122	2/12/2014	POA00219634	POA00219634	Memorandum from Sue F. McCormick to Honorable Board of Water Commissioners, City of Detroit, Michigan, re: Interim Wholesale Customer Rates for the City of Flint for April 17, 2014 through June 30, 2014	No Objection	
DWSD Parties	11123						
DWSD Parties	11124	6/30/2014	POA00219638	POA00219642	Resolution Adopting Wholesale Customer Rates for the City of Flint for April 17, 2014 through June 30, 2014	No Objection	
DWSD Parties	11125	3/13/2014	POA00249271	POA00249272	Richard Hinshon, Hinshon Environmental Consulting Proposal re: Evaluation of SRF Re-Structuring for Detroit/Regional Water & Sewer Authority, dated March 13, 2014	Hearsay	
DWSD Parties	11126	7/25/2014	AGMC-NPFG-EXP00005650	AGMC-NPFG-EXP00005650	Bloomberg screenshot in support of Expert Report of Nathaniel Singer	Hearsay; Foundation	
DWSD Parties	11127	7/25/2014			Expert Report of John S. Young*	Hearsay	
DWSD Parties	11128	7/25/2014			Expert Report of John S. Young, Jr., Exhibit 1	Hearsay	
DWSD Parties	11129	7/25/2014			Expert Report of Joseph Centofanti, Exhibit A	Hearsay	
DWSD Parties	11130	7/25/2014			Expert Report of Joseph Centofanti*	Hearsay	
DWSD Parties	11131	7/25/2014			Expert Report of Nathaniel Singer and Attachments*	Hearsay	
DWSD Parties	11132	7/25/2014			Expert Report of Nathaniel Singer, Attachment 1	Hearsay	
DWSD Parties	11133	7/25/2014			Expert Report of Nathaniel Singer, Attachment 4	Hearsay	
DWSD Parties	11134	7/25/2014			Expert Report of Nathaniel Singer, Attachment 7	Hearsay	
DWSD Parties	11135	7/25/2014			Expert Report of Nathaniel Singer, Attachment 8	Hearsay	
DWSD Parties	11136	7/25/2014			Expert Report of Nathaniel Singer, Attachment 9	Hearsay	
DWSD Parties	11137	7/25/2014			Expert Report of Nathaniel Singer Chart (page 10)	Hearsay	
DWSD Parties	11138	7/25/2014			Expert Report of Nathaniel Singer Chart (page 17)	Hearsay	
DWSD Parties	11139	7/25/2014			Expert Report of Nathaniel Singer Chart (page 18)	Hearsay	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11140	7/25/2014			Expert Report of Nathaniel Singer Chart (page 26)	Hearsay	
DWSD Parties	11141	7/25/2014			Expert Report of Nathaniel Singer Chart (page 30)	Hearsay	
DWSD Parties	11142	7/25/2014			Expert Report of Nathaniel Singer Chart (page 31)	Hearsay	
DWSD Parties	11143	7/25/2014			Expert Report of Nathaniel Singer Chart (page 38)	Hearsay	
DWSD Parties	11144	7/25/2014			Expert Report of Nathaniel Singer Chart (page 44)	Hearsay	
DWSD Parties	11145	7/25/2014			Expert Report of Nathaniel Singer Chart (page 45)	Hearsay	
DWSD Parties	11146	7/25/2014			Expert Report of Nathaniel Singer Chart (page 46)	Hearsay	
DWSD Parties	11147	7/25/2014			Expert Report of Nathaniel Singer Chart (page 48)	Hearsay	
DWSD Parties	11148	7/25/2014			Expert Report of Nathaniel Singer Diagram (page 15)	Hearsay	
DWSD Parties	11149	7/25/2014			Expert Report of Nathaniel Singer Screenshot (Appendix C)	Hearsay	
DWSD Parties	11150	7/25/2014			Expert Report of Nathaniel Singer Screenshot (page 40)	Hearsay	
DWSD Parties	11151	7/25/2014			Expert Report of Nathaniel Singer Screenshot (page 41)	Hearsay	
DWSD Parties	11152	7/25/2014			Expert Report of Nathaniel Singer Screenshot (page 42)	Hearsay	
DWSD Parties	11153	7/25/2014			Expert Report of Nathaniel Singer Screenshot (page 43)	Hearsay	
DWSD Parties	11154	7/25/2014			Expert Report of Thomas S. Terry, Appendix A	Hearsay	
DWSD Parties	11155	7/25/2014			Expert Report of Thomas S. Terry*	Hearsay	
DWSD Parties	11156	7/25/2014			Expert Report of Thomas S. Terry, Figure 1	Hearsay	
DWSD Parties	11157	7/25/2014			Expert Report of Thomas S. Terry, Figure 2	Hearsay	
DWSD Parties	11158	7/25/2014			Expert Report of Thomas S. Terry, Figure 3	Hearsay	
DWSD Parties	11159	7/25/2014			Expert Report of Thomas S. Terry, Figure 4	Hearsay	
DWSD Parties	11160	7/25/2014			Expert Report of Thomas S. Terry, Figure 5	Hearsay	
DWSD Parties	11161	7/25/2014			Expert Report of William E. Oliver and Attachments*	Hearsay	
DWSD Parties	11162	7/25/2014			Expert Report of William E. Oliver, Attachment A	Hearsay	
DWSD Parties	11163	7/25/2014			Expert Report of William E. Oliver, Attachment C	Hearsay	
DWSD Parties	11164	7/25/2014			Expert Report of William E. Oliver, Attachment D	Hearsay	
DWSD Parties	11165	7/25/2014			Expert Report of William E. Oliver, Attachment E	Hearsay	
DWSD Parties	11166	7/25/2014			Expert Report of William E. Oliver, Attachment F	Hearsay	
DWSD Parties	11167	7/25/2014			Expert Report of William E. Oliver Chart (page 16)	Hearsay	
DWSD Parties	11168	7/25/2014			Expert Report of William E. Oliver Chart (page 9)	Hearsay	
DWSD Parties	11169	7/25/2014			Expert Report of William E. Oliver Chart (page D-2)	Hearsay	
DWSD Parties	11170	7/25/2014			Expert Report of William E. Oliver Chart (page D-4)	Hearsay	
DWSD Parties	11171	7/25/2014			Expert Report of William E. Oliver Charts (page D-3)	Hearsay	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11172	7/25/2014			Expert Report of William E. Oliver Table (page 10)	Hearsay	
DWSD Parties	11173	7/25/2014			Expert Report of William E. Oliver Table (page 12)	Hearsay	
DWSD Parties	11174	7/25/2014			Expert Report of William E. Oliver Table (page 15)	Hearsay	
DWSD Parties	11175	7/25/2014			Expert Report of William E. Oliver Table (page E-7)	Hearsay	
DWSD Parties	11176	7/25/2014			Expert Report of William E. Oliver Table (page F-7)	Hearsay	
DWSD Parties	11177	7/25/2014			Expert Report of William E. Oliver Tables (page E-5)	Hearsay	
DWSD Parties	11178	7/25/2014			Expert Report of William E. Oliver Tables (page F-5)	Hearsay	
DWSD Parties	11179	7/25/2014	AGMC-NPFG-EXP00002974	AGMC-NPFG-EXP00002974	Spreadsheet in support of Expert Report of Nathaniel Singer	Hearsay	
DWSD Parties	11180	7/25/2014	AGMC-NPFG-EXP00002975	AGMC-NPFG-EXP00002975	Spreadsheet in support of Expert Report of Nathaniel Singer	Hearsay	
DWSD Parties	11181	7/25/2014	AGMC-NPFG-EXP00005647	AGMC-NPFG-EXP00005647	Spreadsheet in support of Expert Report of Thomas S. Terry	Hearsay	
DWSD Parties	11182	7/25/2014	AGMC-NPFG-EXP00005648	AGMC-NPFG-EXP00005648	Spreadsheet in support of Expert Report of Thomas S. Terry	Hearsay	
DWSD Parties	11183	7/25/2014	AGMC-NPFG-EXP00005649	AGMC-NPFG-EXP00005649	Spreadsheet in support of Expert Report of Thomas S. Terry	Hearsay	
DWSD Parties	11184	8/7/2014			"Let It Rip: Duggan takes control of water department," WJBK-TV | Fox 2, available at: http://www.myfoxdetroit.com/clip/10451965/undefined.	Hearsay; Speculation	
DWSD Parties	11185	8/26/2013	POA00014227	POA00014228	Addendum #1 to Change Order #1, dated August 26, 2013 [Buckfire Ex. 7]	No Objection	
DWSD Parties	11186	6/16/2014	POA00725134	POA00725141	Amended and Restated Change Order #1, dated June 16, 2014 [Buckfire Ex. 8]	No Objection	
DWSD Parties	11187	7/31/2014			The Detroit News, Business, "Duggan right guy for city water job" by Daniel Howes, published on July 31, 2014 [Duggan Ex. 13]	Hearsay; Speculation	
DWSD Parties	11188	7/29/2014			The Detroit News, Metro and State, Wayne County, "Orr gives control of Detroit's water department to mayor" by Steve Pardo and Christine Ferretti, published on July 29, 2014 [Duggan Ex. 12]	Hearsay; Speculation	
DWSD Parties	11189	3/20/2014	POA00512753	POA00512827	Board of Water Commissioners, Finance Committee Agenda, dated March 20, 2014	No Objection	
DWSD Parties	11190	7/16/2013	POA00014227	POA00014228	Change Order #1: Addendum to Exhibits A & B To Include Additional Requested Services and Fees, dated July 16, 2013 [Buckfire Ex. 6]	No Objection	
DWSD Parties	11191	10/18/2013	OAK0005134	OAK0005139	City of Detroit: DWSD Oakland County Business Issues Memo: Conway/Miller Buckfire Response, dated October 18, 2013 [OAK0005134-139 [Buckfire Exhibit 25]	No Objection	
DWSD Parties	11192	1/2/2014	OAK0009680	OAK0009705	Comparison of DWSD Frameworks - MillerBuckfire	No Objection	
DWSD Parties	11193	11/13/2013	POA00248978	POA00248998	Critique of Financial Assumptions Underlying the Calculation of Proposed Lease Payment and Other Related Issues, Oakland County, Michigan, dated November 13, 2013 [McCormick Ex. 32]	Hearsay	
DWSD Parties	11194	10/2/2013	POA00107044	POA00107116	Detroit Water & Sewer Department - 10-Year Business Plan [Orr Ex. 10]	No Objection	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11195	2/25/2014	MCOPW021313	MCOPW021327	Detroit Water & Sewer Department - County Business Plan Due Diligence Process [Orr Ex. 15]	No Objection	
DWSD Parties	11196	10/2/2013	OAK0013980	OAK0014029	Detroit Water & Sewerage Dept., Analysis of New Water/Sewer Authority, dated October 2, 2013 [Buckfire Ex. 22]	No Objection	
DWSD Parties	11197	4/9/2014	POA00399770	POA00399832	Detroit Water and Sewerage Department Meeting Agenda - Final Board of Water Commissioners, Special Meeting No. 3	No Objection	
DWSD Parties	11198	Dec. 2013	OAK0002064	OAK0002068	DWSD - Analysis of DWSD Saving for December 2013 [Orr Ex. 13]	No Objection	
DWSD Parties	11199	10/2/2013	POA001707117	POA00107166	DWSD - Analysis of New Water / Sewer Authority [Orr Ex. 9]	No Objection	
DWSD Parties	11200	1/2/2014	OAK0009680	OAK0009705	DWSD - Comparison of DWSD Frameworks [Orr Ex. 14]	No Objection	
DWSD Parties	11201	2/18/2014	OAK002742	OAK002744	DWSD - Proposal, An Occam's Razor Approach to DWSD	Hearsay	
DWSD Parties	11202	12/4/2013	OAK0027688	OAK0027691	Email from Adam Lorbert to Rober Daddow, Laurie VanPelt, Jerry Poisson, RE: Detroit: DWSD - Miller Buckfire	Hearsay; Speculation	
DWSD Parties	11203	11/1/2013	OAK0014819	OAK0014823	Email from Adam M. Lorbert to Robert Daddow, Laurie VanPelt, copying others, Re: Follow Up Analysis (including attachment)	Hearsay	
DWSD Parties	11204	10/16/2013	POA00064805	POA00064821	Email from Chris M. Gannon to Michael J. Hausman, Charles M. Moore, Fwd: THIS REQUIRES A RESPONSE - COMMENTS FROM BOB DADDOW (including attachment)	Hearsay	
DWSD Parties	11205	3/4/2013	MCOPW006523	MCOPW006531	Email from Craig Hupp to "Fredtheengineer," Re: Macomb CONFIDENTIAL MEMORANDUM (including attachment)	Hearsay	
DWSD Parties	11206	1/13/2014	OAK0009552	OAK0009570	Email from Craig Hupp to Kenneth A. Buckfire, copying others, Re: DWSD Term Sheet Bodman Draft January 13.DOCX (including attachment)	Hearsay	
DWSD Parties	11207	2/19/2014	OAK0010382	OAK0010384	Email from James Meenahan to Bob Daddow, copying Jerry Poisson, Re: DWSD Financial Binder	Hearsay	
DWSD Parties	11208	9/9/2013	POA00174802	POA00174802	Email from Kevyn Orr to Sue McCormick, Re: Engaging with Flint/Genesee	No Objection	
DWSD Parties	11209	3/3/2014	POA00000001	POA00000003	Email from Michael J. Hausman to Heather Lennox, Brian L. Sedlak, Nicolette Bateson, Bart Foster, Sue McCormick, William Wolfson, Amanda Van Dusen, David P. Massaron, Kenneth Buckfire, Kevin Haggard, Sanjay Marken, FW: Disclosure Statement Issues	Hearsay	Rule 403
DWSD Parties	11210	5/1/2014	POA00273110	POA00273216	Email from Nicolette Bateson to Thomas Gavin, copying others, Re: Detroid [*sic*] WS Questions	No Objection	
DWSD Parties	11211	12/11/2013	MCOPW000907	MCOPW000931	Email from Robert Daddow to Craig Hupp, Richard Sulaka Jr., William Misterovich, FW: Critique of Lease Payment Proposal on Non-Financial and Assumptions Used (including attachment)	Hearsay	Rule 403
DWSD Parties	11212	12/17/2013	OAK0021108	OAK0021150	Email from Robert Daddow to T. Saxton, copying Jerry Poisson, FW: Critique of Lease Payment Proposal on Non-Financial and Assumptions Used (including attachments)	Hearsay	
DWSD Parties	11213	2/5/2014	OAK0027305	OAK0027309	Email from Robert Daddow to Amanda Van Dusen and others [Buckfire Ex. 27]	Hearsay	
DWSD Parties	11214	3/5/2014	OAK0004293	OAK0004308	Email from Robert Daddow to Chad Holcom, RE: Crain's query - water/sewer POA provisions (including attachments)	Hearsay	Hearsay, Foundation, Speculation,

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
							Relevance, Rule 403
DWSD Parties	11215	12/12/2013	OAK0028797	OAK0028802	Email from Robert Daddow to Gerald Poisson, Laurie VanPelt, L Brooks Patterson, RE: Term Sheet - Revised with Changes and Comments - REVISED	Hearsay	
DWSD Parties	11216	2/10/2014	OAK0022323	OAK0022326	Email from Robert Daddow to Sanjay Marken, Ken Buckfire, Kevin Haggard, copying others, FW: DWSD Diligence: Email 4 of 7 (including attachment)	Hearsay	
DWSD Parties	11217	11/2/2011			Letter from Chris Brown, James G. Fausone, Charles Pugh and Gary A. Brown to David M. Ottenwess, Re: DWSD Root Cause Committee [Orr Ex. 2]	No Objection	
DWSD Parties	11218	4/7/2014	OAK0010989	OAK001108	Letter from Gerald D. Poisson and Jim Nash to Kevyn D. Orr [Orr Ex. 16]	Hearsay	
DWSD Parties	11219	4/7/2014	MCOPW011747	MCOPW011753	Letter from Gerald Poisson and Jim Nash to Kevyn Orr	Hearsay	
DWSD Parties	11220	3/13/2013	MCOPW006572	MCOPW006582	Letter from James G. Fausone to David M. Ottenwess, Re: DWSD Root Cause Committee's Final Report [Orr Ex. 5]	No Objection	
DWSD Parties	11221	3/20/2014	OAK0007439	OAK0007439	Letter from Jim Nash and Robert Daddow to Kevyn Orr and Stacy Fox, RE: Response to Request for "Confirmatory" Due Diligence	Hearsay	
DWSD Parties	11222	10/21/2013	POA00010334	POA00010343	Letter from Kevin Haggard to Robert Daddow, Re: Business Issues - Conway / Buckfire Reports [Orr Ex. 11]	No Objection	
DWSD Parties	11223	3/28/2013	POA00039495	POA00039497	Letter from Kevyn Orr to orrk@detroitmi.gov, Fwd: Root Cause Committee Report Final Form 3/13 [Orr Ex. 7]	No Objection	
DWSD Parties	11224	12/4/2013	POA00116271	POA00116272	Letter from Stacy Fox to Kenneth Buckfire, Re: DWSD Opportunity - United Water [Orr Ex. 12]	No Objection	
DWSD Parties	11225	2/00/2013	POA00042378	POA00042395	Materials Prepared for Discussion - Assessment of City Assets [Orr Ex. 6]	No Objection	
DWSD Parties	11226	9/26/2013			Miller Buckfire, Post-Petition Financing Discussion, dated September 26, 2013 [City Ex. 88]	No Objection	
DWSD Parties	11227	4/17/2014			Oakland County Board of Commissioners, Meeting Minutes, dated April 17, 2014, available at: http://www.oakgov.com/boc/Documents/	Hearsay; Relevance	
DWSD Parties	11228	3/27/2013			Opinion & Order Terminating Second Amended Consent Judgment and Closing This Case, United States v. City of Detroit, No. 77-cv-71100 (E.D. Mich. March 27, 2013) [Docket. No. 2528]	No Objection	
DWSD Parties	11229				Plan Confirmation Factual Propositions [Orr Ex. 19]	No Objection	
DWSD Parties	11230		POA00317774	POA00317808	Reorganizing for Success at Detroit Water and Sewerage Department [McCormick Ex. 9]	No Objection	
DWSD Parties	11231	3/13/2013	MCOPW006572	MCOPW006582	Root Cause Committee Final Report [McCormick Ex. 24]	No Objection	
DWSD Parties	11232				Services Contract Between City of Detroit, Michigan and Miller Buckfire & Co., LLC [Buckfire Ex. 5]	No Objection	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11233	3/27/2013			United States District Court, Eastern District of Michigan, Southern Court - Opinion & Order, Terminating Second Amended Consent Judgment and Closing this Case - Case No. 77-71100 United States of America (Plaintiff) v. City of Detroit, et al. (Defendants) [Orr Ex. 4]	No Objection	
DWSD Parties	11234	11/4/2011			United States District Court, Eastern District of Michigan, Southern Court - Order - Case No. 77-71100 United States of America (Plaintiff) v. City of Detroit, et al. (Defendants) [Orr Ex. 3]	No Objection	
DWSD Parties	11235	9/9/2011	POA00262971	POA00263014	United States of America v. City of Detroit et al., Case No. 77-71100, Opinion & Order Denying Without Prejudice The City of Detroit's Motion to Dismiss, Dkt. 2397, dated September 9, 2011	No Objection	
DWSD Parties	11236	3/27/2013			United States of America v. City of Detroit et al., Case No. 77-71100, Opinion & Order Terminting Second Amended Consent Judgment and Closing This Case, Dkt. 2528, dated March 27, 2013	No Objection	
DWSD Parties	11237	12/14/2012	POA00263088	POA00263110	United States of America v. City of Detroit et al., Case No. 77-71100, Opinion & Order, Dkt. 2512, dated December 14, 2012	No Objection	
DWSD Parties	11238	11/4/2011	POA00017742	POA00017772	United States of America v. City of Detroit et al., Case No. 77-71100, Order, Dkt. 2410, dated November 4, 2011	No Objection	
DWSD Parties	11239	December 2005			Actuarial Standard of Practice No 12: Risk Classification (for All Practice Areas)	Hearsay	
DWSD Parties	11240	4/1/2014	AGMC-NFPG-EXP_00003062	AGMC-NFPG-EXP_00003066	April 2014 NASRA Issue Brief: Public Pension Plan Investment Return Assumptions	Hearsay	
DWSD Parties	11241	9/1/2013			ASB, Actuarial Standard of Practice No. 27: Selection of Economic Assumptions for Measuring Pension Obligations [Bowen Ex. 20]	Hearsay	
DWSD Parties	11242	9/1/2007			ASB, Actuarial Standard of Practice No. 4: Measuring Pension Obligations and Determining Pension Plan Costs or Contributions [Bowen Ex. 21]	Hearsay	
DWSD Parties	11243						
DWSD Parties	11244	12/1/2013	POA00604157	POA00604161	December 2013 NASRA Issue Brief: Public Pension Plan Investment Return Assumptions	Hearsay	
DWSD Parties	11245				Detroit City Code - Chapter 47 - Article I - Common Provisions of the Retirement System	No Objection	
DWSD Parties	11246				Detroit City Code - Chapter 47 - Article II - Defined Benefit/Defined Contribution (Annuity) Plan of the General Retirement System	No Objection	
DWSD Parties	11247		POA00249282	POA00249284	Draft Memorandum to Commissioners re: DWSD Optimization	Hearsay; Foundation	
DWSD Parties	11248	1/10/2014	POA00626630	POA00626631	Email from Alan Perry to Marty Dirks, Milliman Senior Investment Consultant, re: Asset Allocation for Detroit, with attachment, dated January 10, 2014	Hearsay; Relevance	
DWSD Parties	11249	6/16/2013	POA00036014	POA00036015	Email from David G. Heiman to Robert D. Gordon, Re: Detroit Retirement Systems (June 16, 2013)	Hearsay; Relevance	
DWSD Parties	11250	7/16/2013	POA600119	POA600125	Email from Glenn Bowen, RE: Milliman work cited - Editorial - "Detroit Free Press" [Bowen Ex. 13]	Hearsay; Relevance	
DWSD Parties	11251	5/18/2014	POA00332965	POA00332965	Email from Richard Drumb to Joseph A. Kowalski, J. Lyons and Blake Stilwill, Re: Net Pension Asset Adjustment, dated May 18, 2014	Hearsay; Relevance	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11252	5/1/2014	POA00332837	POA00332844	Email from Plante Moran to DWSD, Re: Draft CAFR - Revised Net Pension Asset analysis 6/30/13	Hearsay; Relevance	
DWSD Parties	11253		POA00602884	POA00602884	General Retirement System and Police and Fire Retirement System Chart [Thomas Ex. 3]	No Objection	
DWSD Parties	11254	3/6/2013	POA00626447	POA00626466	General Retirement System of the City of Detroit: Meeting Materials, dated March 6, 2013 [Thomas Ex. 2]	No Objection	
DWSD Parties	11255	1/00/2005	POA00129420	POA00129468	GRS Annual Actuarial Valuation (2005)	No Objection	
DWSD Parties	11256	1/00/2006	POA00129469	POA00129517	GRS Annual Actuarial Valuation (2006)	No Objection	
DWSD Parties	11257	1/00/2007	POA00221212	POA00221260	GRS Annual Actuarial Valuation (2007)	No Objection	
DWSD Parties	11258	1/00/2008	POA00221261	POA00221309	GRS Annual Actuarial Valuation (2008)	No Objection	
DWSD Parties	11259	1/00/2009	POA00044886	POA00044935	GRS Annual Actuarial Valuation (2009)	No Objection	
DWSD Parties	11260	1/00/2010	POA00044936	POA00044986	GRS Annual Actuarial Valuation (2010)	No Objection	
DWSD Parties	11261	1/00/2011	POA00044987	POA00045036	GRS Annual Actuarial Valuation (2011)	No Objection	
DWSD Parties	11262	1/00/2012	POA00042018	POA00042065	GRS Annual Actuarial Valuation (2012)	No Objection	
DWSD Parties	11263	1/00/2013	MCOPW00066 6	MCOPW00071 8	GRS Annual Actuarial Valuation (2013)	No Objection	
DWSD Parties	11264	1/00/2012			GRS Annual Report (2012)	No Objection	
DWSD Parties	11265	6/30/2012	POA00604171		GRS Estimate of Water/Sewage Unfunded Liability as of June 30, 2012, based on GRS Valuation, dated November 5, 2013	No Objection	
DWSD Parties	11266	1/00/2000	AGMC-NFPG-EXP_00005122	AGMC-NFPG-EXP_00005136	GRS Independent Audit Report (2000)	No Objection	
DWSD Parties	11267	1/00/2001	AGMC-NFPG-EXP_00005137	AGMC-NFPG-EXP_00005152	GRS Independent Audit Report (2001)	No Objection	
DWSD Parties	11268	1/00/2002	AGMC-NFPG-EXP_00005153	AGMC-NFPG-EXP_00005177	GRS Independent Audit Report (2002)	No Objection	
DWSD Parties	11269	1/00/2003	AGMC-NFPG-EXP_00005178	AGMC-NFPG-EXP_00005202	GRS Independent Audit Report (2003)	No Objection	
DWSD Parties	11270	1/00/2004	AGMC-NFPG-EXP_00005203	AGMC-NFPG-EXP_00005228	GRS Independent Audit Report (2004)	No Objection	
DWSD Parties	11271	1/00/2005	AGMC-NFPG-EXP_00005229	AGMC-NFPG-EXP_00005251	GRS Independent Audit Report (2005)	No Objection	
DWSD Parties	11272	1/00/2006	AGMC-NFPG-EXP_00005252	AGMC-NFPG-EXP_00005279	GRS Independent Audit Report (2006)	No Objection	
DWSD Parties	11273	1/00/2007	AGMC-NFPG-EXP_00005280	AGMC-NFPG-EXP_00005314	GRS Independent Audit Report (2007)	No Objection	
DWSD Parties	11274	1/00/2008	AGMC-NFPG-EXP_00005315	AGMC-NFPG-EXP_00005364	GRS Independent Audit Report (2008)	No Objection	
DWSD Parties	11275	1/00/2009	AGMC-NFPG-EXP_00005365	AGMC-NFPG-EXP_00005394	GRS Independent Audit Report (2009)	No Objection	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11276	1/00/2010	AGMC-NFPG-EXP_00005395	AGMC-NFPG-EXP_00005427	GRS Independent Audit Report (2010)	No Objection	
DWSD Parties	11277	1/00/2011	AGMC-NFPG-EXP_00005428	AGMC-NFPG-EXP_00005458	GRS Independent Audit Report (2011)	No Objection	
DWSD Parties	11278	1/00/2012	AGMC-NFPG-EXP_00005459	AGMC-NFPG-EXP_00005488	GRS Independent Audit Report (2012)	No Objection	
DWSD Parties	11279	1/00/2013	AGMC-NFPG-EXP_00005489	AGMC-NFPG-EXP_00005521	GRS Independent Audit Report (2013)	No Objection	
DWSD Parties	11280	6/30/2013	POA00626596		GRS Simple 10-Year Roll-Forward Projection Model with Potential Benefit Cuts Based on Results of Final 2012 Valuation Report - DWSD Members Only Adjusted to Reflect Plan Freeze and Cessation of All Future COLAs, dated June 30, 2013	No Objection	
DWSD Parties	11281	6/30/2013	POA00604169		GRS Simple 10-Year Roll-Forward Projection Model with Potential Benefit Cuts Based on Results of Final 2012 Valuation Report - Without DWSD Members Adjusted to Reflect Plan Freeze and Cessation of All Future COLAs, dated June 30, 2013	No Objection	
DWSD Parties	11282				Investment Charts [Thomas Ex. 11]	Authenticatio n, Foundation	
DWSD Parties	11283	10/1/2012			Milliman 2012 Public Pension Funding Study [Bowen Ex. 5]	No Objection	
DWSD Parties	11284	11/1/2013			Milliman 2012 Public Pension Funding Study [Bowen Ex. 6]	No Objection	
DWSD Parties	11285	11/4/2013	POA00260254	POA00260260	Milliman Memorandum re: Recommended Investment Return Assumption as of June 30, 2013 for DGRS (November 4, 2013) [Bowen Ex. 2]	No Objection	
DWSD Parties	11286	3/18/2013	POA600884	POA600888	NASRA Issue Brief: Public Pension Plan Investment Return Assumptions [Bowen Ex. 15]	Hearsay, Relevance	
DWSD Parties	11287	1/17/2013	POA00626522	POA00626523	Police and Fire Retirement System of the City of Detroit, Proposed Asset Allocation Policy Targets - Alternative B, dated January 17, 2013 [Thomas Ex. 1]	No Objection	
DWSD Parties	11288				Public Fund Survey [Bowen Ex. 14]	Hearsay, Relevance	
DWSD Parties	11289	7/21/2014	AGMC-NFPG-EXP_00005115	AGMC-NFPG-EXP_00005121	Response of Gabriel, Roeder, Smith & Company to Assured Guaranty Municipal Corp.'s First Set of Interrogatories to Gabriel Roeder Smith, In re City of Detroit, No. 13-53846 (Bankr. E.D. Mich. July 21, 2014)	No Objection	
DWSD Parties	11290				Statement No. 25 of the Government Accounting Standards Board: Accounting for Pensions by State and Local Governmental Employers	No Objection	
DWSD Parties	11291				Statement No. 27 of the Government Accounting Standards Board: Accounting for Pensions by State and Local Governmental Employers	No Objection	
DWSD Parties	11292				Statement No. 34 of the Government Accounting Standards Board: Accounting for Pensions by State and Local Governmental Employers	No Objection	
DWSD Parties	11293				Statement No. 67 of the Government Accounting Standards Board: Accounting for Pensions by State and Local Governmental	No Objection	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
					Employers		
DWSD Parties	11294				Statement No. 68 of the Government Accounting Standards Board: Accounting for Pensions by State and Local Governmental Employers	No Objection	
DWSD Parties	11295	6/30/2010	POA00044936	POA00044986	The General Retirement System of the City of Detroit 72nd Annual Actuarial Valuation, June 30, 2010, Gabriel, Roeder, Smith & Company [Thomas Ex. 12]	No Objection	
DWSD Parties	11296	6/30/2007	POA00012951 8	POA00012956 6	The General Retirement System of the City of Detroit 73rd Annual Actuarial Valuation, June 30, 2007, Gabriel, Roeder, Smith & Company [Thomas Ex. 14]	No Objection	
DWSD Parties	11297	6/30/2008	POA00044837	POA00044885	The General Retirement System of the City of Detroit 73rd Annual Actuarial Valuation, June 30, 2008, Gabriel, Roeder, Smith & Company [Thomas Ex. 15]	No Objection	
DWSD Parties	11298	6/30/2011	POA00024041 7	POA00024046 6	The General Retirement System of the City of Detroit 73rd Annual Actuarial Valuation, June 30, 2011, Gabriel, Roeder, Smith & Company [Thomas Ex. 13]	No Objection	
DWSD Parties	11299	6/30/2012	POA00275794	POA00275846	The General Retirement System of the City of Detroit 75th Annual Actuarial Valuation, June 30, 2012, Gabriel, Roeder, Smith & Company [Bowen Ex. 42] [Thomas Ex. 10]	No Objection	
DWSD Parties	11300	6/30/2013			The General Retirement System of the City of Detroit 75th Annual Actuarial Valuation, June 30, 2013, Gabriel, Roeder, Smith & Company [Bowen Ex. 22]	No Objection	
DWSD Parties	11301		POA00626560	POA00626560	Untitled Milliman produced native file	No Objection	
DWSD Parties	11302		POA00626561	POA00626561	Untitled Milliman produced native file	No Objection	
DWSD Parties	11303		POA00626562	POA00626562	Untitled Milliman produced native file	No Objection	
DWSD Parties	11304		POA00626589	POA00626589	Untitled Milliman produced native file	No Objection	
DWSD Parties	11305	5/16/2014	POA00276275	POA00276275	City of Detroit - POC Allocation [Malhotra Ex. 15]	No Objection	
DWSD Parties	11306	7/11/2014	POA00725098	POA00725098	City of Detroit, DWSD - estimated legacy cost savings as a result of Plan of Adjustment [Malhotra Ex. 12]	No Objection	
DWSD Parties	11307	7/11/2014	POA00725099	POA00725099	City of Detroit, DWSD - estimated legacy cost savings as a result of Plan of Adjustment [Malhotra Ex. 13]	No Objection	
DWSD Parties	11308		POA00275503	POA00275511	City of Detroit, Plan of Adjustment - 40 year projections [Malhotra Ex. 8]	No Objection	
DWSD Parties	11309		POA00706603	POA00706611	City of Detroit, Plan of Adjustment - 40 year projections [Malhotra Ex. 9]	No Objection	
DWSD Parties	11310	6/14/2013	POA00215882	POA00216015	City of Detroit, Proposal for Creditors [Orr Ex. 8]	No Objection	
DWSD Parties	11311		POA00275421	POA00275502	City of Detroit, Ten-Year Financial Projections [Malhotra Ex. 6]	No Objection	
DWSD Parties	11312		POA00706519	POA00706600	City of Detroit, Ten-Year Financial Projections [Malhotra Ex. 7]	No Objection	
DWSD Parties	11313		POA00275767	POA00275767	DWSD Professional Fee Allocation Chart [Malhotra Ex. 14]	No Objection	
DWSD Parties	11314	2/21/2014			Exhibit I.A.150 Interest Rate Reset Chart [Docket No. 2708, pages 89-96] [Doak Ex. 1]	No Objection	
DWSD Parties	11315	2/21/2014			Exhibit I.A.166 – New DWSD Bonds, Summary of Principal Terms [Docket No. 2708] [Buckfire Ex. 15]	No Objection	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11316	5/5/2014	Dkt. No. 4391		Fourth Amended Disclosure Statement with Respect to Fourth Amended Plan for the Adjustment of Debts of the City of Detroit pages, 102-108 [Dkt. No. 4391] [McCormick Ex. 6]	No Objection	
DWSD Parties	11317	5/5/2014	Dkt. No. 4391		Fourth Amended Disclosure Statement with Respect to Fourth Amended Plan for the Adjustment of Debts of the City of Detroit pages, 185-188 [Dkt. No. 4391] [McCormick Ex. 8]	No Objection	
DWSD Parties	11318	5/5/2014	Dkt. No. 4391		Fourth Amended Disclosure Statement with Respect to Fourth Amended Plan for the Adjustment of Debts of the City of Detroit pages, 77-82 [Dkt. No. 4391] [McCormick Ex. 10]	No Objection	
DWSD Parties	11319	5/5/2014	Dkt. No. 4391		Fourth Amended Disclosure Statement with Respect to Fourth Amended Plan for the Adjustment of Debts of the City of Detroit, pages 1-3 [Dkt. No. 4391] [McCormick Ex. 4]	No Objection	
DWSD Parties	11320	5/5/2014	Dkt. No. 4391-1		Fourth Amended Plan for the Adjustment of Debts of the City of Detroit (May 5th, 2014), pages 172-183 [Dkt. No. 4391-1] [McCormick Ex. 19] [Doak Ex. 2]	No Objection	
DWSD Parties	11321	5/5/2014	Dkt. No. 4391-1		Fourth Amended Plan for the Adjustment of Debts of the City of Detroit (May 5, 2014), pages 2-70 [Dkt. No. 4391-1] [McCormick Ex. 5]	No Objection	
DWSD Parties	11322	5/5/2014	Dkt. No. 4391-2		Fourth Amended Plan of Adjustment Exhibit L, DWSD Current and Historical Financial Information [Dkt. No. 4391-2, pages 181-185] [Porter Ex. 11]	No Objection	
DWSD Parties	11323	5/5/2014	Dkt. No. 4391-2		Fourth Amended Plan of Adjustment Exhibit M, DWSD Financial Projections [Dkt. No. 4391-2, pages 186-212] [Porter Ex. 12]	No Objection	
DWSD Parties	11324	6/14/2013	POA00215882	POA02216015	Proposal for Creditors, City of Detroit [Buckfire Ex. 13]	No Objection	
DWSD Parties	11325	5/28/2014			Transcript of Hearing re: Outsanding Objections to Written Discovery and Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment, In re: City of Detroit, Michigan, Case No. 13-53846	No Objection	
DWSD Parties	11326	7/29/2014			United States Bankruptcy Court, Eastern District of Michigan - Corrected Fifth Amended Plan for the Adjustment of Debts of the City of Detroit [Duggan Ex. 3]	No Objection	
DWSD Parties	11327	5/5/2014			United States Bankruptcy Court, Eastern District of Michigan, Southern Division - Fourth Amended Disclosure Statement with Respect to Fourth Amended Plan for the Adjustment of Debts of the City of Detroit [Duggan Ex. 2]	No Objection	
DWSD Parties	11328	5/1/2014	POA00270585	POA00270591	Water & Sewerage Dept. DWSD Debt Restructuring Summary [Doak Ex. 3]	No Objection	
DWSD Parties	11329		POA00678911	POA00678916	Confidential Draft Summary of Proposal Responses for Purposes of Discussions - All terms and Indicative Rates Provided Prior to S&P Downgrade [Bateson Ex. 1]	No Objection	
DWSD Parties	11330	3/3/2014	OAK0023188	OAK0023198	Email from J. Bryan Williams to J. Nash and others, FW: Fitch Final Release - Detroit Water & Sewer (including attachments)	No Objection	
DWSD Parties	11331	4/2/2013	POA00173301	POA00173305	Email from Kevyn Orr to Sue McCormick, Re: Fitch Downgrade	Hearsay	
DWSD Parties	11332	6/17/2013	POA00163768	POA00163770	Email from Sue McCormick to Kevyn Orr, Fwd: Fitch Rating Action - Detroit, Michigan	Hearsay	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11333	6/24/2013	POA00164357	POA00164359	Email from Sue McCormick to Kevyn Orr, Re: Ratings Agencies	Hearsay	
DWSD Parties	11334	9/30/2013			Fitch Downgrades Detroit, MI ULTGOs and LTGos to 'D'	Hearsay	
DWSD Parties	11335	5/30/2014			Fitch Ratings - Fitch Maintains Watch Negative on Detroit, Michigan's Water & Sewer Revs [Foster Ex. 6]	Hearsay	
DWSD Parties	11336	12/12/2013			Fitch Ratings, 2014 Outlook: Water and Sewer Sector	Hearsay	
DWSD Parties	11337	12/12/2013			Fitch Ratings, 2014 Water and Sewer Medians app. B	Hearsay	
DWSD Parties	11338	January 2014			Fitch Ratings, Definitions of Ratings and Other Forms of Opinion	Hearsay	
DWSD Parties	11339	8/6/2013			Fitch Ratings, Fitch Affirms Michigan Finance Authority's SRF Bonds at 'AAA'; Outlook Stable	Hearsay	
DWSD Parties	11340	2/28/2014			Fitch Ratings, Fitch Downgrades Detroit, MI's Sr and Sub Water Revs & Sewer Revs; Negative Watch Maintained, dated February 28, 2014 [Buckfire Ex. 20]	Hearsay	
DWSD Parties	11341	9/18/2013			Fitch Ratings, Fitch on Detroit: Special Report	Hearsay	
DWSD Parties	11342	5/29/2012			Fitch Ratings, Fitch Rates Detroit, MI Sewer Revs 'A1'; Downgrades Outstanding Debt, dated May 29, 2012 [Buckfire Ex. 19]	Hearsay	
DWSD Parties	11343	2/24/2014			Fitch Ratings, Fitch: Detroit Plan of Adjustment Hostile to Bondholders	Hearsay	
DWSD Parties	11344	4/30/2014			Fitch Ratings, Large Cities, Great Recession – How Have the 30 Largest Fitch-Rated Cities Fared During and After the Recession	Hearsay	
DWSD Parties	11345	6/3/2013			Fitch Ratings, Revenue-Supported Rating Criteria	Hearsay	
DWSD Parties	11346	7/31/2013			Fitch Ratings, U.S. Water and Sewer Revenue Bond Rating Criteria	Hearsay	
DWSD Parties	11347	3/27/2014	POA00557442	POA00557447	Letter from Glenn M. Kushiner to Michael J. Hausman, Fwd: S&P call (Letter originally sent from John Hill to khand@conwaymackenzie.com) [Hill Ex. 4]	No Objection	
DWSD Parties	11348	7/17/2013	POA00405570	POA00405574	Letter from Nicolette Bateson to Self, Fwd: Fitch: Detroit Water & Sewer Bonds Remain on Negative Watch, Monitoring Proposed Restructuring [Bateson Ex. 5]	Hearsay	
DWSD Parties	11349	5/14/2014			Moody's Investors Servs., City of Detroit MI GO Rating History - June 28, 1977 to April 28, 1999	Hearsay	
DWSD Parties	11350	7/8/2013			Moody's Investors Servs., Detroit Emergency Manager's Proposal to Credits: A Discussion on the Opening Offer (July 8, 2013)	Hearsay	
DWSD Parties	11351	4/7/2014			Moody's Investors Servs., Detroit Proposes Plan with Even Smaller Recoveries for Creditors	Hearsay	
DWSD Parties	11352	6/30/2014			Moody's Investors Servs., Detroit Sewer Enterprise Ratings as of June 30, 2014	Hearsay	
DWSD Parties	11353	2/24/2014			Moody's Investors Servs., Detroit's Bankruptcy Exit Plan: GO and COP Creditors Face Biggest Losses; Litigation Likely	Hearsay	
DWSD Parties	11354	7/22/2013			Moody's Investors Servs., Detroit's Bankruptcy Filing Increases Probability of Payment Disruption	Hearsay	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11355	6/20/2013			Moody's Investors Servs., Detroit's Default and Restructuring Plan Are Credit Negative for Bond Insurers	Hearsay	
DWSD Parties	11356	9/16/2004			Moody's Investors Servs., High Profile Rating Update: County of Orange CA	Hearsay	
DWSD Parties	11357	10/2/2013			Moody's Investors Servs., Issuer Comment, Risks remain for future payment of Detroit water and sewerage debt, despite October 1 full payment	Hearsay	
DWSD Parties	11358	8/12/2013			Moody's Investors Servs., Jefferson County and Detroit Recovery Proposals Expose Investors to Market Risk	Hearsay	
DWSD Parties	11359	11/13/2013			Moody's Investors Servs., Jefferson County, Alabama's Debt Offering Has Non-Investment Grade Characteristics	Hearsay	Relevance, Rule 403
DWSD Parties	11360	12/20/2011			Moody's Investors Servs., Moody's Assigns A1 Rating and Review for Possible Downgrade on the City of Detroit's (MI) $103.9 Million Water Revenue Refunding Senior Lien Bonds Series 2011C	Hearsay	
DWSD Parties	11361	12/8/2011			Moody's Investors Servs., Moody's Assigns A1 Rating and Review of Possible Downgrade on the City of Detroit's (MI) $482.0 Million Water Revenue Senior Lien Bonds Series 2011A and $11.4 Million Water Revenue Senior Lien Bonds Series 2011B	Hearsay	
DWSD Parties	11362	5/30/2012			Moody's Investors Servs., Moody's Assigns Baa1 Rating to $575.0 Million of City of Detroit Sewage Disposal System Revenue and Revenue Refunding Senior Lien Bonds, Series 2012A; Ratings on Review for Possible Downgrade	Hearsay	
DWSD Parties	11363	3/20/2014			Moody's Investors Servs., Moody's Assigns Initial A2 to Karegnondi Water Authority's (MI) $220M Water Bonds, Series 2014A	Hearsay	
DWSD Parties	11364	12/20/2010			Moody's Investors Servs., Moody's Downgrades Rating to A1 from Aa3 on the City of Detroit's (MI) Senior Lien Sewage Revenue Debt and Downgrades Rating to A2 from A1 on City's Second Lien Sewage Revenue Debt; Negative Outlook Assigned	Hearsay	
DWSD Parties	11365	11/19/2013			Moody's Investors Servs., Rating Action: Moody's Confirms Detroit's (MI) Water Enterprise Revenue Ratings at B1 Senior Lien, B2 Second Lien; Outlook Negative	Hearsay	
DWSD Parties	11366	11/19/2013			Moody's Investors Servs., Rating Action: Moody's Confirms Detroit's (MI) Caa3 GO rating and Ca GOLT and Cop ratings; outlook negative	Hearsay	
DWSD Parties	11367	11/19/2013			Moody's Investors Servs., Rating Action: Moody's Confirms Detroit's (MI) Sewer Enterprise Revenue Ratings at B1 Senior Lien, B2 Second Lien; Outlook Negative	Hearsay	
DWSD Parties	11368	April 2014			Moody's Investors Servs., Rating Symbols and Definitions	Hearsay	
DWSD Parties	11369	11/19/2013			Moody's Investors Servs., Rating Update Moody's confirms ratings on Detroit's (MI) Distributable State Aid backed bonds; outlook negative	Hearsay	
DWSD Parties	11370	11/28/2012			Moody's Investors Servs., Rating Update: Moody's Downgrades Detroit GOULT bonds and COPS to Caa1 from B3 and GOLT Bonds to Caa2 from Caa1; Water and Sewage Senior and Second Lien Bonds Downgraded to Baa3 and Ba1	Hearsay	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11371	6/13/2013			Moody's Investors Servs., Rating Update: Moody's Downgrades Detroit GOULT Bonds to Caa2 and GOLT and COPS to Caa3; Water and Sewage Revenue Senior and Second Lien Bonds Downgraded to Ba1 and Ba2	Hearsay	
DWSD Parties	11372	6/14/2012			Moody's Investors Servs., Rating Update: Moody's Downgrades Detroit's GOULT Bonds and COPs to B3 from B2 and GOLT Bonds to Caa1 from B3; Water and Sewage Revenue Senior and Second Lien Bonds Downgraded to Baa2/Baa3 from Baa1/Baa2	Hearsay	
DWSD Parties	11373	11/19/2013			Moody's Investors Servs., Rating Update: Moody's Confirms Detroit's (MI) Sewer Enterprise Revenue Ratings at B1 Senior Lien, B2 Second Lien; Outlook Negative	Hearsay	
DWSD Parties	11374	7/26/2013			Moody's Investors Servs., Special Comment: Detroit Bankruptcy May Change How Other Distressed Cities Approach Their Pension and Debt Obligations	Hearsay	
DWSD Parties	11375	4/29/2014			Moody's Investors Servs., Water and Sewer Pre-set Medians-All Ratings	Hearsay	
DWSD Parties	11376	6/17/2013			Moody's Investors Service, Rating Update: Moody's Downgrades Detroit's GOULT Rating to Caaa3; GOLT and COPs Ratings Downgraded to Ca Following Default; and Water and Sewage Revenue Ratings Downgraded to B1 Senior Lien, B2 Second Lien, dated June 17, 2013 [Buckfire Ex. 18]	Hearsay	
DWSD Parties	11377	4/9/2012			Moody's Investors Service, Rating Update: Moody's Downgrades Ratings to Baa1 From A1 on the City of Detroit's (MI) Senior Lien Water and Sewerage Disposal Debt and Downgrades Rating to Baa2 From A2 on the City's Second Lien Water and Sewerage Disposal Debt [Buckfire Ex. 17]	Hearsay	
DWSD Parties	11378	4/1/2011			Press Release, Fitch Ratings, Fitch Downgrades Detroit Water System Senior Revs. to 'A' & Sub. Revs. to 'A-'; Outlook Stable	Hearsay	
DWSD Parties	11379	6/14/2013			Press Release, Fitch Ratings, Fitch Downgrades Detroit, MI COPS & ULTGO's to 'C'; Water & Sewer Rev. Bonds on Rating Watch Negative	Hearsay	
DWSD Parties	11380	9/20/2013			Press Release, Fitch Ratings, Fitch Downgrades Detroit, MI ULTGOs and LTGOs to 'D'	Hearsay	
DWSD Parties	11381	4/1/2013			Press Release, Fitch Ratings, Fitch Downgrades Detroit, MI Water Sr. and Sub. Revs. to 'BBB+'/'BBB'; Outlook Revised to Negative	Hearsay	
DWSD Parties	11382	5/30/2014			Press Release, Fitch Ratings, Fitch Maintains Watch Negative on Detroit, Michigan's Water & Sewer Revs.	Hearsay	
DWSD Parties	11383	5/29/2012			Press Release, Fitch Ratings, Fitch Rates Detroit MI Sewer 'A-'; Downgrades Outstanding Debt	Hearsay	
DWSD Parties	11384	6/13/2013			Press Release, Standard & Poor's, Detroit 'A+' And 'A' Water Supply Bond Ratings Affirmed On Future Financial Performance At Least Matching Past Trends	Hearsay	
DWSD Parties	11385	5/12/2014			S&P 2014 Review of the U.S. Municipal Water and Sewer Ratings: How They Correlate with Key Economic and Financial Ratios	Hearsay	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11386	10/1/2012			Standard & Poor's Rating Servs., Criteria For Assigning 'CCC+', 'CCC', 'CCC-' And 'CC' Ratings	Hearsay	
DWSD Parties	11387	9/15/2008			Standard & Poor's Rating Servs., Key Water and Sewer Utility Credit Ratio Ranges	Hearsay	
DWSD Parties	11388	7/19/2013			Standard & Poor's Rating Servs., RatingsDirect, Detroit Water Revenue Bond Ratings Placed On CreditWatch Negative Due to City's Chapter 9 Filing	Hearsay	
DWSD Parties	11389	3/19/2014			Standard & Poor's Rating Servs., RatingsDirect, Karegnondi Water Authority, Michigan Genesee County; General Obligation	Hearsay	
DWSD Parties	11390	7/3/2013			Standard & Poor's Rating Servs., RatingsDirect, Summary: Detroit Water/Sewer	Hearsay	
DWSD Parties	11391	10/11/2013			Standard & Poor's Rating Servs., RatingsDirect, Summary: Detroit Water/Sewer	Hearsay	
DWSD Parties	11392	3/25/2014			Standard & Poor's Rating Servs., RatingsDirect, Summary: Detroit; Water/Sewer	Hearsay	
DWSD Parties	11393	3/25/2014			Standard & Poor's Ratings Servs., Detroit Water and Sewer Revenue Bond Ratings Lowered to 'CCC' on Vulnerability to Default; Remains on Watch Negative	Hearsay	
DWSD Parties	11394	7/9/2013			Standard & Poor's Servs., RatingsDirect, Detroit Water Revenue Bond Ratings Placed On CreditWatch Negative Due To City's Chapter 9 Filing	Hearsay	
DWSD Parties	11395	9/15/2008			Standard & Poor's, Criteria for Rating Water and Sewer and Drainage Utility Bonds	Hearsay	
DWSD Parties	11396				Standard & Poor's, Guide to Credit Rating Essentials: What are Credit Ratings and How they Work?, available at: http://img.en25.com/Web/StandardandPoors/SP_CreditRatingsGuide.pdf	Hearsay	
DWSD Parties	11397	5/12/2009			Standard and Poor's Rating Servs., RatingsDirect, Rating Implications of Exchange Offers and Similar Restructurings, Update	Hearsay	
DWSD Parties	11398	12/24/2013			Standard and Poor's Rating Servs., RatingsDirect, Summary: Detroit; Water/Sewer	Hearsay	
DWSD Parties	11399	5/8/2013			Standard and Poor's Rating Servs., RatingsDirect, U.S. Municipal Water and Sewer System Metrics and Ratios: The Numbers Are Just One Piece of the Puzzle	Hearsay	
DWSD Parties	11400	3/25/2014			Standard and Poor's Ratings Servs., S&P Places Its CCC Rating on Detroit's Series 1998A and B Bonds on CreditWatch Negative	Hearsay	
DWSD Parties	11401				U.S. Census, Selected Economic Characteristics 2008-2012 American Community Survey 5-Year Estimates, Detroit, MI, tbl.DP03, available at: http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_12_5YR_DP03&prodType=table.	No Objection	
DWSD Parties	11402				U.S. Census, Selected Economic Characteristics 2012 American Community Survey 1-Year Estimates, Detroit, MI, tbl.CP03, available at http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_12_1YR_CP03&prodType=table	No Objection	
DWSD Parties	11403	5/12/2014	RAMIREZ0000414	RAMIREZ0000421	Agreement Between Detroit Water & Sewerage Department and Ramirez & Co. dated May 12, 2014 [Sobel Ex. 2]	No Objection	
DWSD Parties	11404	5/21/2014	RAMIREZ0001129	RAMIREZ0001129	Analytics Committee Agenda, dated May 21, 2014 [Sobel Ex. 4]	Hearsay	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11405	1/8/2014	MCOPW000844	MCOPW000856	Barclays, Presentation to Miller Buckfire & Co., dated January 8, 2014 [Buckfire Ex. 26]	Hearsay	
DWSD Parties	11406	4/4/2014	RAMIREZ000030	RAMIREZ000031	City of Detroit Water & Sewerage Department Finance Division Letter to Theodore Sobel, dated April 4, 2014 [Sobel Ex. 1]	No Objection	
DWSD Parties	11407	6/4/2014	RAMIREZ0000711	RAMIREZ0000711	Preliminary Financing Schedule, dated June 4, 2014 [Sobel Ex. 5]	Hearsay	
DWSD Parties	11408	4/11/2014	RAMIREZ000585	RAMIREZ000595	Ramirez & Co., Inc. Response to Request for Proposals for Financial Advisory Services dated April 11, 2014 [Sobel Ex. 3]	Hearsay	
DWSD Parties	11409	7/10/2013	OAK0003699	OAK0003711	Siebert Brandford Shank & Co. LLC, Impact of New Regional Water and Sewer Authority on Future Bond Issuance for the Detroit Water and Sewerage Department, dated July 10, 2013 [Buckfire Ex. 24]	Hearsay	
DWSD Parties	11410	8/11/2014	Docket No. 6644		Administrative Consent Order [Exhibit 9 to Motion to Use Cash Collateral or to Obtain Credit, Docket No. 6644]	No Objection	
DWSD Parties	11411	8/7/2014			Amendment to the Authorized Denomination for Sewer Tender Offer	No Objection	
DWSD Parties	11412	8/11/2014	Docket No. 6644		Assured Insurance Commitment Term Sheet [Ex. 7 to Motion to Use Cash Collateral or to Obtain Credit, Docket No. 6644]	No Objection	
DWSD Parties	11413	3/3/2014	POA00275757	POA00275766	Baird Municipal Bond Market Weekly (March 3, 2014)	Hearsay	
	11414						
DWSD Parties	11415	3/25/2014	POA00535409	POA00535475	Barclays Response to Request for Proposal for Underwriting Services: State of Michigan Department of Treasury (March 25, 2014)	No Objection	
DWSD Parties	11416	3/25/2014	POA00655355	POA00655421	Barclays Response to Request for Proposal: State of Michigan Department of Treasury, dated March 25, 2014	No Objection	
DWSD Parties	11417	4/8/2014	POA00679171	POA00679232	Barclays Senior Managing Underwriter Interview presentation to Michigan Finance Authority (April 8 , 2014)	No Objection	
DWSD Parties	11418	7/1/2014	POA00706612	POA00706612	Bloomberg Revenue Table [Buckfire Ex. 21]	Hearsay	
DWSD Parties	11419		POA00642861	POA00643004	Bond Authorizing Order for Financial Recovery Bonds	No Objection	
DWSD Parties	11420	8/11/2014	Docket No. 6644		Capital Improvement Plan [Ex. 10 to Motion to Use Cash Collateral or to Obtain Credit, Docket No. 6644]	No Objection	
DWSD Parties	11421	3/25/2014	POA00678845	POA00678873	Citigroup Response to Request for Proposal for Underwriting Services: Michigan Department of Treasury Michigan Finance Authority, dated March 25, 2014	No Objection	
DWSD Parties	11422	4/8/2014	POA00336869	POA00336894	Citigroup Response to Request for Proposal for Underwriting Services: Michigan Finance Authority, dated April 8, 2014	No Objection	
DWSD Parties	11423	3/25/2014	POA00253207	POA00253235	Citigroup Response to Request for Proposal: Michigan Department of Treasury Michigan Finance Authority, dated March 25, 2014	No Objection	
DWSD Parties	11424		POA00443292	POA00443354	City of Detroit Sewage Disposal System Presentation to Standard & Poor's [McCormick Ex. 27]	No Objection	
DWSD Parties	11425		POA00216881	POA00216882	City of Detroit, Detroit Water and Sewer Department, Sewer System, Historical Operating Expenditures	No Objection	
DWSD Parties	11426	4/8/2014	POA00276317	POA00276343	City of Detroit, Michigan Financial Recovery Bonds - Series 2014, Bond Purchase Agreement (April 8, 2014)	No Objection	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11427	7/5/2013	OAK0009809	OAK0009882	City of Detroit, Michigan, Response from J.P. Morgan, dated July 5, 2013 [City Ex. 61]	No Objection	
DWSD Parties	11428	8/11/2014	Docket No. 6644		Declaration of David Brownstein [Ex. 5C to Motion to Use Cash Collateral or to Obtain Credit, Docket No. 6644]	No Objection	
DWSD Parties	11429	8/11/2014	Docket No. 6644		Declaration of Lee Donner [Ex. 5A to Motion to Use Cash Collateral or to Obtain Credit, Docket No. 6644]	No Objection	
DWSD Parties	11430	8/11/2014	Docket No. 6644		Declaration of Nicolette Bateson [Ex. 5B to Motion to Use Cash Collateral or to Obtain Credit, Docket No. 6644]	No Objection	
DWSD Parties	11431	3/27/2014	MCOPW021930	MCOPW021945	Detroit Water and Sewer Department: Discussion, Status and Business Issues North Oakland Republican Club	Hearsay; Foundation	
DWSD Parties	11432	4/3/2014	MCOPW021952	MCOPW021952	Detroit Water and Sewer Department: Discussion, Status and Business Issues Rochester Area Republican Club	Hearsay; Foundation	
DWSD Parties	11433	8/6/2014			DWSD 2014 Tender Offer, Refunding, and New Money Plan - Presentation to the Board of Water Commissioners	No Objection	
DWSD Parties	11434		POA00227395	POA00227405	DWSD Debt Analysis-Interest Rate Reset	No Objection	
DWSD Parties	11435	3/14/2014	POA00216884	POA00216886	DWSD Water Supply System, FY 2013-2014 Financial Plan Performance Summary - Year to Date thru December, dated March 14, 2014	No Objection	
DWSD Parties	11436	3/7/2014	POA00359702	POA00359705	Email from Alfred Diebel to Gavin Thomas, Re: Recovery Bonds	Hearsay	
DWSD Parties	11437	4/19/2012	POA00413663	POA00413669	Email from Charlie Fleetham to James George, FW: 041812 DWSD-KWA Financial Committee Meeting Summary (including attachment)	Hearsay	
DWSD Parties	11438	4/17/2012	POA004202	POA00420289	Email from Mark Somers to Chris Brown, J. George, Schenk, B. Foster, S. Roberts, T. Gavin, J. Santambrogio, Re: Sewer Financing Discussion	Hearsay	
DWSD Parties	11439	3/2/2014	POA00123087	POA00123087	Email from Nicolette Bateson to Stacy Fox, Re: Fitch Final Release Detroit Water & Sewer	Hearsay	
DWSD Parties	11440	5/23/2012	POA00416603	POA00416605	Email from Thomas Gavin to Matthew Schenk, Bart Foster, Nick Foster, Stephan Roberts, Dealena Welkomer, Freda Wang, Robert Schwartz, James George, FW: Answer to Questions (including attachment)	Hearsay	
DWSD Parties	11441		POA00725331	POA00725392	Financial Recovery Bond Trust Indenture Between City of Detroit, County of Wayne, Michigan and UMB Bank, N.A. as Trustee	No Objection	
DWSD Parties	11442	8/11/2014	Docket No. 6644		Financing Term Sheets [Ex. 6 to Motion to Use Cash Collateral or to Obtain Credit, Docket No. 6644]	No Objection	
DWSD Parties	11443	4/16/2013	POA00407386	POA00407423	Goldman Sachs Financing Discussion presentation to DWSD, dated April 16, 2013	Hearsay	
DWSD Parties	11444	3/25/2014	POA00253236	POA00253272	Goldman Sachs Response to Request for Proposal for Underwriting Services: Michigan Finance Authority, dated March 25, 2014	No Objection	
DWSD Parties	11445	3/25/2014	POA00253273	POA00253307	J.P. Morgan Response to Request for Proposal: Michigan Finance Authority on Behalf of Detroit Water and Sewerage Department, dated March 25, 2014	No Objection	
DWSD Parties	11446	4/1/2014			Karegnondi Water Authority Official Statement, Counties of Genesee, Lapeer and Sanilac, State of Michigan, $220,500,000 Water Supply System Bonds (Karenondi Water Pipeline), Series 2014A (April 1, 2014)	Relevance	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11447	1/30/2014	AGMC-NFPG-EXP_00002288	AGMC-NFPG-EXP_00002290	Kevyn Orr, City of Detroit, Order No. 22, Order Ratifying and Approving Resolution of the Board of Water Commissioners Authorizing Publication of Notice of Intent to Issue Sewage Disposal System Revenue Bonds, dated January 30, 2014	No Objection	
DWSD Parties	11448	3/31/2014	POA00655353	POA00655487	Letter from Nicolette Bateson to Amanda Van Dusen, Brad Erens, Massaron, Afillingham Sanjay Marken and Kevin Haggard - fwd: MFA Respones [Bateson Ex. 3]	No Objection	
DWSD Parties	11449	4/18/2014	POA00336868	POA00336894	Letter from Nicolette Bateson to Kevin Haggard - fwd: Citi DWSD Final Orals Book [Bateson Ex. 4]	No Objection	
DWSD Parties	11450	5/7/2014	POA00723171	POA00723316	Management Presentation to RFI Responders, dated May 7-8, 2014	No Objection	
DWSD Parties	11451	3/12/2014			Michigan Department Michigan Finance Authority Request for Proposal for Underwriting Services, dated March 12, 2014	No Objection	
DWSD Parties	11452	3/21/2014	RAMIREZ0001 129	RAMIREZ0001 129	Michigan Finance Authority on behalf of Detroit Water & Sewerage Department - Sewerage Disposal System Revenue Senior Lien Bonds, Series 2014A Analytics Committee Agenda [Sobel Ex. 4]	No Objection	
DWSD Parties	11453	3/25/2014	POA00253273	POA00253307	Michigan Finance Authority on behalf of Detroit Water and Sewerage Department - J.P. Morgan's Response to Request for Proposal for Underwriting Services [Foster Ex. 5]	No Objection	
DWSD Parties	11454	6/4/2014	RAMIREZ0000 711	RAMIREZ0000 71	Michigan Finance Authority on behalf of the Detroit Water and Sewerage Department - Series 2014 Sewer Bonds, Preliminary Financing Schedule - DRAFT - For Discussion Purposes Only [Sobel Ex. 5]	No Objection	
DWSD Parties	11455	4/8/2014	POA00679171	POA00679232	Michigan Finance Authority, Detroit Water and Sewerage Department - Senior Managing Underwriter Interview [Foster Ex. 4]	No Objection	
DWSD Parties	11456	2/28/2014	AGMC-NFPG-EXP_00002812	AGMC-NFPG-EXP_00002813	Municipal Securities Rulemaking Board, Notice of Failure to Provide Annual Financial Information for the Year Ended 6/30/13 - City of Detroit Operating Data - Sewage; Operating Data - Water, dated February 28, 2014, available at: http://emma.msrb.org/EP791575-EP612806-EP1014350.pdf	No Objection	
DWSD Parties	11457	7/2/2014	POA00706615	POA00706615	Municipal Securities Rulemaking Board::EMMA – Par Amount Traded for Most Active Sectors (Chart) [Buckfire Ex. 11]	No Objection	
DWSD Parties	11458	8/11/2014	Docket No. 6644		Notice Of Motion Of The Debtor For A Final Order Pursuant To (I) 11 U.S.C. §§ 105, 364(C), 364(D)(1), 364(E), 902, 904, 921, 922 And 928 (A) Approving Postpetition Financing And (B) Granting Liens And (II) Bankruptcy Rule 9019 Approving Settlement Of Confirmation Objections[Ex. 2 to Motion to Use Cash Collateral or to Obtain Credit, Docket No. 6644]	No Objection	
DWSD Parties	11459		POA00678910	POA00678910	Oral Interview Questions for Senior Managing Underwriter Candidates	No Objection	
DWSD Parties	11460	4/8/2014	POA00557382	POA00557389	Quality of Life Financing, Trust Indenture, Bond proceeds and debt service summary (April 8, 2014)	No Objection	
DWSD Parties	11461	3/25/2014	POA00253315	POA00253347	Response to Request for Proposal for Underwriting Services for the: Michigan Finance Authority - Detroit Water and Sewerage Department - Siebert Brandford Shank & Co., LLC [Bateson Ex. 2]	No Objection	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11462	8/11/2014	Docket No. 6644		Sewer Tender Offer Invitation and Disclosure Statement [Exhibit 8A to Motion to Use Cash Collateral or to Obtain Credit, Docket No. 6644]	No Objection	
DWSD Parties	11463	8/29/2012	OAK0010010	OAK0010018	Siebert, Brandford Shank & Co. presentation to Board of Water Commissioners Detroit Water and Sewerage Department, dated August 29, 2012)	Hearsay	
	11464						
DWSD Parties	11465	9/1/2012	OAK0010004	OAK001008	Tab 2: Enhancing DWSD Credit (Siebert Brandford Shank)	Hearsay	
DWSD Parties	11466	6/9/2014	POA00706616	POA00706688	Transcript Index Syndication of $120,000,000 City of Detroit, County of Wayne, Michigan Financial Recovery Bonds, Series 2014 (June 9, 2014)	No Objection	
DWSD Parties	11467	8/11/2014	Docket No. 6644		Water Tender Offer Invitation and Disclosure Statement [Ex. 8B to Motion to Use Cash Collateral or to Obtain Credit, Docket No. 6644]	No Objection	
DWSD Parties	11468	7/21/2014	Docket No. 6179		Declaration of Michael J. Paque Regarding the Solicitation of Votes on, and the Results of Voting with Respect to, Fourth Amended Plan for the Adjustment of Debts of the City of Detroit	No Objection	
DWSD Parties	11469	1/20/2014	OAK0006403	OAK0006404	Email from Craig Hupp attaching revised MOU for GLWA	No Objection	
DWSD Parties	11470	1/20/2014	OAK0006422	OAK0006431	Memorandum of Understanding Regarding the Formation of Great Lakes Water and Sewer Authority	No Objection	
DWSD Parties	11471	10/18/2001			Official Statement - Sewer Series 2001(D)	No Objection	
DWSD Parties	11472	2/20/2014			Proof of Claim of U.S. Bank, as Indenture Trustee for the Water Bonds	No Objection	
DWSD Parties	11473	2/20/2014			Proof of Claim of U.S. Bank, as Indenture Trustee for the Sewer Bonds	No Objection	
DWSD Parties	11474	3/23/2005			Closing Transcripts, Series 2005(A) Water Bonds	No Objection	
DWSD Parties	11475	5/14/2008			[Remarketing] Closing Transcripts, Series 2001(C) Water Bonds	No Objection	
DWSD Parties	11476	12/15/2011			Sale Order, Series 2011(A), (B), (C) Water Bonds	No Objection	
DWSD Parties	11477	10/23/2001			Closing Transcripts, Series 2001(E) Sewer Bonds	No Objection	
DWSD Parties	11478	5/7/2008			[Remarketing] Closing Transcripts, Series 2001(E) Sewer Bonds	No Objection	
DWSD Parties	11479	5/7/2008			Berkshire Hathaway Policy No. 98FGA200002 Sewer 2001(E)	No Objection	
DWSD Parties	11480	5/14/2008			Berkshire Hathaway Policy No. 98FGA200004 Water 2001(C)	No Objection	
DWSD Parties	11481	5/8/2008			Berkshire Hathaway Policy No. 98FGA200001 Sewer 2001(C-2)	No Objection	
DWSD Parties	11482	5/14/2008			Berkshire Hathaway Policy No. 98FGA200005 Water 2005(B)	No Objection	
DWSD Parties	11483	5/7/2008			Berkshire Hathaway Policy No. 98FGA200003 Sewer 2006(A)	No Objection	
DWSD Parties	11484	2/20/2014			Proof of Claim of Assured Guaranty Municipal Corp for the Water Bonds (Claim No. 1166)	No Objection	
DWSD Parties	11485	2/20/2014			Proof of Claim of Assured Guaranty Municipal Corp for the Sewer Bonds (Claim No. 1167)	No Objection	
DWSD Parties	11486	2/20/2014			Proof of Claim of National Public Finance Guarantee Corporation for the Sewer Bonds (Claim No. 1029)	No Objection	
DWSD Parties	11487	2/20/2014			Proof of Claim of National Public Finance Guarantee Corporation for the Water Bonds (Claim No. 1046)	No Objection	

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11488	2/21/2014			Proof of Claim of MBIA Insurance Corporation for the Water Bonds (Claim No. 1042)	No Objection	
DWSD Parties	11489	2/22/2014			Proof of Claim of MBIA Insurance Corporation for the Sewer Bonds (Claim No. 1095)	No Objection	
DWSD Parties	11490	7/18/2014			Deposition Designation - Nicolette Bateson, Chief Financial Officer, DWSD	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
DWSD Parties	11491	7/17/2014			Deposition Designation - Bart Foster, The Foster Group	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
DWSD Parties	11492	7/11/2014			Deposition Designation - Sue McCormick, Director/Chief Executive Officer, DWSD	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
DWSD Parties	11493	6/27/2014			Deposition Designation - Cheryl Porter, Chief Operating Officer, DWSD	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
DWSD Parties	11494						

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11495						
DWSD Parties	11496	8/8/2014			Deposition Designation - Judith Ann Kermans, Gabriel Roeder Smith & Co.	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
DWSD Parties	11497						
DWSD Parties	11498	7/9/2014			Deposition Designation - Cynthia Thomas, Executive Director, Retirement Systems	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	
DWSD Parties	11499				Michigan Finance Authority, Local Government Loan Program Revenue Bonds, Series 2014C Official Statement (Detroit Water and Sewerage Department Sewage Disposal System Revenue and Revenue Refunding Local Project Bonds)	No Objection	
DWSD Parties	11500				Michigan Finance Authority, Local Government Loan Program Revenue Bonds, Series 2014D Official Statement (Detroit Water and Sewerage Department Water Supply System Revenue and Revenue Refunding Local Project Bonds)	No Objection	
DWSD Parties	11501		AGM0019508	AGM0019515	Assured Guaranty - Amended and Restated Muncipal Insurance Commitment	No Objection	
DWSD Parties	11502	7/23/2014			Deposition Designation - Charles Moore, Conway MacKenzie		
DWSD Parties	11503	7/2/2014			Deposition Designation - Vyto Kaunelis, OHM Advisors		
DWSD Parties	11504	8/1/2014			Deposition Designation - Michael Duggan, Mayor of City		
DWSD Parties	11505	7/17/2014			Deposition Designation - John Hill, City CFO		
DWSD Parties	11506	7/31/2014			Deposition Designation - Martha Kopacz, Director, Phoenix Management Service		
DWSD Parties	11507	7/25/2014			Deposition Designation - Alan Perry, Milliman		
DWSD Parties	11508	8/21/2014			Fitch Ratings, Detroit Water/Sewer Tender Would Not be Distressed Debt Exchange, Aug. 21, 2014		
DWSD Parties	11509				N/A		

Party	Exhibit No.	Date	POA # Beg.	POA # End	Exhibit Description	City Objections	Retirees Committee Objections
DWSD Parties	11510				N/A		
DWSD Parties	11511				N/A		
DWSD Parties	11512				N/A		
DWSD Parties	11513				N/A		
DWSD Parties	11514				N/A		
DWSD Parties	11515				N/A		
DWSD Parties	11516				N/A		
DWSD Parties	11517				N/A		
DWSD Parties	11518				N/A		
DWSD Parties	11519	8/20/2014	Docket No. 6908		United States Bankruptcy Court, Eastern District of Michigan - Sixth Amended Plan for the Adjustment of Debts of the City of Detroit		
DWSD Parties	11520	6/16/2014			City of Detroit's Identification of 30(b)(6) Witnesses [McCormick Exhibit 2]		
DWSD Parties	11521	7/7/2014	Docket No. 5786		Notice of 30(b)(6) Deposition of Gabriel Roeder Smith & Company [Kermans Exhibit 1]		
					* The DWSD Parties list these documents provisionally in the event that the Court determines that expert reports are admissible as evidence. The DWSD Parties have objected to admission of the Plan Supporters' expert reports.		

ATTACHMENT G

THE AD HOC COPS HOLDERS' CONSOLIDATED (1) WITNESS LIST AND (2) EXHIBIT LIST

The Ad Hoc COPs Holders will call the following individuals as fact or expert witnesses, as noted below, as part of its case in chief or on rebuttal:

- William B. Fornia (Expert)

The Ad Hoc COPs Holders reserve all of their rights, including the right to call any person listed by other parties, persons needed for purposes of authentication, and rebuttal witnesses, as well as to name additional witnesses as may be necessary to address changes, amendments, supplements, and objections to the Plan.

Ad Hoc COPs Holders Exhibit List

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1001	POA00275794 – POA00275846	Thomas Exhibit 10		November 5, 2013: 74th Annual Actuarial Valuation, June 30, 2012	No Objection	No Objection
1002	POA00544488 – POA00544536 GAB0003004 – GAB0003052			May 17, 2011: Supplemental Valuation Results Using Alternate Investment Return Assumptions and Asset Smoothing Periods	No Objection	No Objection
1003	POA00044543 – POA00044614			February 17, 2009: 5-Year Experience Study July 1, 2002 through June 30, 2007	No Objection	No Objection

[11] The Retiree Committee adopts all of the City's objections to the COPs exhibits and adds the objections stated below.

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1004	POA00042018 – POA00042065			The Police and Fire Retirement System of the City of Detroit May 22, 2013: 71st Annual Actuarial Valuation, June 30, 2012	No Objection	No Objection
1005	POA00725482 – POA00725530 GAB0003004 – GAB0003052			May 17, 2011: Supplemental Valuation Results Using Alternate Investment Return Assumptions and Asset Smoothing Periods	Foundation. Document contains handwriting on many pages.	Adopts City's Objection
1006	POA00044615 – POA00044673			January 29, 2009: 5-Year Experience Study July 1, 2002 through June 30, 2007	No Objection	No Objection
1007				[Removed]	No Objection	No Objection
1008	POA00259814- POA00259824			Bowen and Warren to Miller, April 17, 2014, DPFRS Actuarial Accrued Liability as of June 30, 2013	No Objection	No Objection

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1009	POA00259635-POA00259663			Bowen and Warren to Miller, April 17, 2014, Re: Requested Supplemental Information for DGRS	No Objection	No Objection
1010	POA00259851-POA00259876			Bowen and Warren to Miller, April 17, 2014, Re: Requested Supplemental Information for DPFRS	No Objection	No Objection
1011	POA00259964 - POA00259972			Bowen and Warren to Miller, April 23, 2014, Re: DPFRS Estimated Funded Status and Unfunded Liabilities in 2023 under a 55% COLA reduction with a 6.75% investment return assumption and four scenarios combining specific Employer Contributions from 2014-2015 to 2022-2023 and assumed market value of assets returns during 2013-2014	No Objection	No Objection

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1012	POA00259901 - POA00259910			Bowen and Warren to Miller, April 25, 2014, Re: DGRS Estimated Employer Contributions Required from July 1, 2014 to June 30, 2023 to have 70% Funded Status in 2023 under ASF Recoupment (20% cap) and 4.5% reduction with a 6.75% investment return assumption	No Objection	No Objection
1013			Docket No. 6257	Fifth Amended Plan of Adjustment of Debts of the City of Detroit, Filed July 25, 2014	No Objection	No Objection
1014	POA00706603 – POA00706611			City of Detroit Plan of Adjustment – 40 year projections	No Objection	No Objection
1015	POA00600884 – POA00600888	Bowen Exhibit 15		NASRA Issue Brief: Public Pension Plan Investment Return Assumptions – updated March 2013	Hearsay	Hearsay

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1016		Bowen Exhibit 20		ASOP No. 27 Selecting Economic Assumptions for Measuring Pension Obligations, September 2013	No Objection	No Objection
1017	POA00602884	Bowen Exhibit 16		Actuarial Assumed Rate of Return for General Retirement System and Police & Fire Retirement System	No Objection	No Objection
1018		Bowen Exhibit 21		Actuarial Standard of Practice No. 4 – Measuring Pension Obligations and Determining Pension Plan Costs or Contributions Revised Edition – Effective May 1, 2011	No Objection	No Objection
1019		Perry Exhibit 10		California State Teachers' Retirement System – Experience Analysis July 1, 2006 – June 30, 2010 – February 2012 Meeting	Hearsay, Relevance, Foundation	Adopts City's Objection

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1020	POA00260505 – POA00260522	Bowen Exhibit 1		July 6, 2012 Milliman letter to Chris Brown re: Initial Assessment of Current Pension and Postretirement Health Situation	No Objection	No Objection
1021		Bowen Exhibit 5, Perry Exhibit 4		Milliman 2012 Public Pension Funding Study	Hearsay, Relevance	Hearsay
1022	POA00245235 – POA00245239	Thomas Exhibit 5		Email from Kriss Andrews 3/22/13 w/ attachment: Statement of the Police and Fire Retirement System City of Detroit Board of Trustees	No Objection	No Objection
1023	POA00602974 – POA00603027	Bowen Exhibit 22		GRS Report - The General Retirement System of the City of Detroit 75th Annual Actuarial Valuation June 30, 2013	No Objection	No Objection
1024	POA00044936 – POA00044986	Bowen Exhibit 23		GRS Report – The Police and Fire Retirement System of the City of Detroit 72nd Annual Actuarial Valuation June 30, 2013	No Objection	No Objection

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1025		Thomas Exhibit 8		Mandate Pipeline – "5 Questions" with Cynthia Thomas, Detroit Retirement Systems	Hearsay, Relevance, Foundation	Adopts City's Objection
1026		Perry Exhibit 11		Milliman Study – Oregon Public Employees Retirement System – 2012 Experience Study (Updated)	Hearsay, Relevance, Foundation	Adopts City's Objection
1027	POA00561044	Thomas Exhibit 9		Letter from Retirement System of Detroit to Emergency Manager and Miller, Canfield, Paddock and Stone dated October 9, 2013 re: Emergency Manager Order No. 16 (Order directing certain city employees to provide information to the emergency manager)	No Objection	Hearsay
1028	POA00260254 – POA00260260	Bowen Exhibit 2		Milliman letter to Jones Day dated November 4, 2013 re: Recommended Investment Return Assumption as of June 30, 2013 for DGRS	No Objection	No Objection

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1029	POA00260302 – POA260308	Bowen Exhibit 3		Milliman letter to Jones Day dated November 4, 2013 re: Recommended Investment Return Assumption as of June 30, 2013 for DPFRS	No Objection	No Objection
1030		Perry Exhibit 5		Milliman 2013 Public Pension Funding Study	Hearsay, Relevance	Hearsay
1031				Milliman Teachers' Pension and Annuity Fund of New Jersey Experience Study July 1, 2009 – June 30, 2012 dated February 2014	Hearsay, Relevance	Adopts City's Objection
1032	POA00259594 – POA00259605	Bowen Exhibit 7		Milliman letter dated April 17, 2014 to Jones Day re: DGRS Actuarial Accrued Liability as of June 30, 2013	No Objection	No Objection
1033	POA00259932 – POA00259950	Bowen Exhibit 17		Milliman letter dated May 5, 2014 to Jones Day re: DGRS Individual Claim Allocation as of June 30, 2013 for active and inactive members – updated	No Objection	No Objection

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1034	POA00259986 – POA00260002	Bowen Exhibit 8		Milliman letter dated May 5, 2014 to Jones Day re: DPFRS Individual Claim Allocation as of June 30, 2013 for active and inactive members – updated	No Objection	No Objection
1035		Bowen Exhibit 19		Milliman letter dated June 10, 2014 to Jones Day re: DGRS Estimated Employer Contributions Required in 2014 – 2015 to 2022 – 2023 to have 70% Funded Status in 2023	No Objection	No Objection
1036		Bowen Exhibit 14, Perry Exhibit 9		Public Fund Survey dated June 26, 2014	No Objection	Hearsay
1037		Kopacz Exhibit 7		National Conference on Public Employee Retirement Systems dated January 16, 2014 – NCPERS on Rockefeller Report: Impractical, Off the Mark	Hearsay; speculative; foundation	Adopts City's Objection

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1038		Kopacz Exhibit 8		GASB News Release 6/25/12 – GASB Improves Pension Accounting and Financial Reporting Standards	Hearsay; speculative; foundation	Speculation, Foundation
1039		Kopacz Exhibit 9		Governmental Accounting Standards Series – Statement No. 67 of the Governmental Accounting Standards Board – Financial Reporting for Pension Plans an amendment of GASB Statement No. 25	No Objection	No Objection
1040				Public Fund Survey dated July 3, 2014	No Objection	Hearsay
1041				Excel spreadsheet containing demographic data for retirees by city (obtained from Data Room, index 3.6)	Relevance	Adopts City's Objection

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1042				Curriculum Vitae of William Fornia, Appendix 1 to the Expert Report of William B. Fornia, FSA, dated July 29, 2014.	Hearsay	Hearsay
1043		Nicholl Exhibit 5		Letter from the Official Committee of Retirees to All Retirees	No Objection	No Objection
1044		Nicholl Exhibit 10		Firefighters' Retirement Plan of the City of St. Louis dated October 1, 2013	Hearsay, Relevance	Hearsay, Relevance, Rule 403
1045		Nicholl Exhibit 11		Segal: Public Sector Letter June 2011	Hearsay, Relevance	Hearsay, Relevance, Rule 403
1046				Chart: Retired Employees Residing in Detroit (Fornia Expert Report, p. 3)	Hearsay, Foundation, Authentication	Hearsay, Relevance, Foundation
1047				Chart: Actuarial Present Value of Vested Benefits (Fornia Expert Report, p. 5)	Hearsay, Foundation, Authentication	Hearsay, Relevance, Foundation
1048				Chart: Impact of ASF on Recovery Percentages (Fornia Expert Report, p. 9)	Hearsay, Foundation, Authentication	Hearsay, Relevance, Foundation

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1049				Chart: Milliman as Actuary for Certain Retirement Systems (Fornia Expert Report, p. 12)	Hearsay, Foundation, Authentication	Hearsay, Relevance, Foundation
1050				Chart: Claim Amounts and Recovery Percentages based on Actuarially Assumed Rate of Investment Return (Fornia Expert Report, p. 15 – typo corrected)	Hearsay, Foundation, Authentication	Hearsay, Relevance, Foundation
1051				Chart: Recovery Percentages: DGRS (Fornia Expert Report, p. 18)	Hearsay, Foundation, Authentication	Hearsay, Relevance, Foundation
1052				Chart: Recovery Percentages: DPFRS (Fornia Expert Report, p. 19)	Hearsay, Foundation, Authentication	Hearsay, Relevance, Foundation

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1053				Excerpts from deposition transcript of Glenn Bowen	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	Adopts City's Objection
1054				Excerpts from deposition transcript of Cynthia Thomas	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	Adopts City's Objection

No.	Bates Number	Deposition Exhibit Number (if applicable)	Court Docket No.	Description	City Objection	Retiree Committee Objection[11]
1055				Excerpts from deposition transcript of Alan Perry	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All objections in the transcript are incorporated by reference; hearsay	Adopts City's Objection
1056	REE00007072			Liability Comparison to Milliman	No Objection	No Objection

The Ad Hoc COPs Holders reserve the right to introduce into evidence any exhibit identified by any other party.

ATTACHMENT H

UAW'S CONSOLIDATED
(1) WITNESS LIST AND (2) EXHIBIT LIST

The UAW hereby identifies the following individuals that it will call as fact witnesses at the Confirmation Hearing.

1	Cynthia Thomas
2	Joe Anne G. Mondowney
3	Laurie Stuart

The UAW hereby identifies the following individuals that it may call as fact witnesses at the Confirmation Hearing.

1	Michael J. VanOverbeke
2	Jack Dietrich
3	Evan Miller

EXHIBIT LIST

Exhibit Number	Description	Objections (all objections are from the City of Detroit)
8001	Excerpts from the transcript of the July 16, 2014 deposition of Jo Anne G. Mondowney	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All Objections in the transcript are incorporated by reference; hearsay
8002	Excerpts from the transcript of the July 15, 2014 deposition of Cynthia Thomas	Improper exhibit. Deposition designations are being handled separately pursuant to stipulation. All Objections in the transcript are incorporated by reference; hearsay
8003	Detroit Library Commission ("DLC") UAW Skilled Trades Unit collective bargaining agreement	No Objection
8004	DLC-UAW Professional Organization of Librarians Unit collective bargaining agreement	No Objection

Exhibit Number	Description	Objections (all objections are from the City of Detroit)
8005	DLC-UAW Association of Professional Librarians Unit collective bargaining agreement	No Objection
8006	May 6, 2014 City of Detroit Objections and Responses to UAW Interrogatories	No Objection
8007	May 8, 2014 General Retirement System of the City of Detroit ("GRS") Responses and Objections to UAW Interrogatories	No Objection
8008	June 30, 2013 GRS Annual Actuarial Valuation	No Objection
8009	June 30, 2013 GRS Pension Plan Financial Report	No Objection
8010	Excerpt from November 19, 2013 minutes of DLC meeting	Hearsay, Incomplete document
8011	June 2014 GRS Informational Meeting presentation slides	Hearsay
8012	"Detroit Library Commission" page from DLC website	Hearsay
8013	June 30, 2011 Detroit Public Library Retiree Health Care Plan Actuarial Valuation Report	No Objection
8014	Detroit Public Library "Pension Contributions to GRS, July 2007 to January 2014" document	Foundation, Hearsay
8015	"Detroit Public Library Summary of	Hearsay

Exhibit Number	Description	Objections (all objections are from the City of Detroit)
	Historical Pension/Employees Benefits Documents"	
8016	June 30, 2013 Detroit Public Library Financial Statements	No Objection
8017	"Library Legislation"	No Objection
8018	December 30, 2013 "Important Retiree Health Plan Information" notice	No Objection
8019	June 29, 2014 UAW grievances against Library re pension changes	Hearsay
8020	August 8, 2014 City Response to UAW Supplemental Discovery Requests	No Objection
8021	Gabriel Roeder Smith & Company's June 30, 2012 Valuation Report	No Objection
8022	Historical Library Financial Schedule	Hearsay; Incomplete document; image differs from produced version
8023	Library Participant ASF Recoupment Data	No Objection
8024	Library GRS Contributions Under Plan of Adjustment	No Objection

ATTACHMENT I

WAYNE COUNTY'S CONSOLIDATED
(1) WITNESS LIST AND (2) EXHIBIT LIST

Wayne County, Michigan, a Michigan Constitutional corporation, a party-in-interest in this case, by and through its County Executive, Robert A. Ficano ("Wayne County"), states that it may call the following fact witnesses at the Confirmation Hearing:

1. Solon Phillips, Wayne County Deputy Chief of Staff to Wayne County Executive;
2. Kenneth Kucel, Deputy Director, Public Services;
3. Kelly Cave, Director, Water Quality Management Division;
4. Vyto Kaunelis, OHM Advisors, advisor to City with respect to DWSD capital improvements;
5. Any rebuttal witnesses;
6. Any witness necessary to authenticate any documents; and,
7. Any witness listed by any other party.

Wayne County reserves the right to amend its witness list as may be necessary.

Wayne County's Exhibit List

EXHIBIT #	DESCRIPTION	OBJECTIONS
7001	Map of Wayne County Sewer System	None
7002	1944 NE Sewer Service Agreement	None
7003	1961 Amendment to 1944 Agreement	None
7004	1961 Sewage Disposal Agreement	None
7005	1983 Amendment to 1944 Agreement	None

ATTACHMENT J

OAKLAND COUNTY'S CONSOLIDATED
(1) WITNESS LIST AND (2) EXHIBIT LIST

Oakland County hereby identifies the following individuals that it will call as expert witnesses at the Confirmation Hearing:

1.	Michael Nadol, Managing Director, Public Financial Management, Inc
2.	William Kriss Andrews, Managing Director, Alderney Advisors, LLC
3.	Daniel Hartman, Managing Director, Public Financial Management, Inc.
4.	Joseph Esuchanko, Actuarial Service Company, PC
5.	William Stannard, Managing Director, Public Financial Management, Inc

Oakland County hereby identifies the following individuals that it may call as witnesses at the Confirmation hearing:

1.	Thomas Terry, CEO, The Terry Group - expert
2.	Robert Daddow, Deputy County Executive, Oakland County - fact

3.	Sidney Lockhart, Assistant Chief Engineer, Oakland County - fact
4.	Jason Matteo, Chief Engineer, Wastewater Services, Macomb County - fact

Oakland County Exhibit List With Noted Objections

Exhibit Number	Date	Exhibit Description	Objection
6001	08/00/2013	2013 Wastewater Needs Assessment Study (DWSD) Pre-Final Draft	No Objection
6002	Accessed 2014	Bureau of Labor Statistics, Consumer Price Index (CPI): All Urban Consumers (Detroit-Ann Arbor-Flint, MI)	No Objection
6003	Accessed 2014	Bureau of Labor Statistics, State and Area Employment, Hours, and Earnings (by MSA and industry)	No Objection
6004	2/21/2014	Chapter 9 Plan for the Adjustment of Debts of the City of Detroit	No Objection
6005	4/15/2014	CIP Monthly Executive Status Report	No Objection
6006	3/25/2014	Citigroup Global Markets, Response to the Request for Proposal for Underwriting Services	No Objection
6007	11/18/2009	City of Detroit CAFR for the Fiscal Year Ended 6/30/2008	No Objection

Exhibit Number	Date	Exhibit Description	Objection
6008	5/28/2010	City of Detroit CAFR for the Fiscal Year Ended 6/30/2009	No Objection
6009	12/17/2010	City of Detroit CAFR for the Fiscal Year Ended 6/30/2010	No Objection
6010	12/22/2011	City of Detroit CAFR for the Fiscal Year Ended 6/30/2011	No Objection
6011	12/28/2012	City of Detroit CAFR for the Fiscal Year Ended 6/30/2012	No Objection
6012	6/30/2014	City of Detroit CAFR for the Fiscal Year Ended 6/30/2013	No Objection
6013	1/24/2007	Letter from City of Detroit Water and Sewerage Department re Board of Water Commissioners public hearing presentations to Detroit City Council on proposed FY 2007/08 water and sewerage system budgets and rates	No Objection
6014	1/23/2008	Letter from City of Detroit Water and Sewerage Department re Board of Water Commissioners public hearing presentations to Detroit City Council on proposed FY 2008/09 water and sewerage system budgets and rates	No Objection

Exhibit Number	Date	Exhibit Description	Objection
6015	2/25/2009	Letter from City of Detroit Water and Sewerage Department re Board of Water Commissioners public hearing presentations to Detroit City Council on proposed FY 2009/10 water and sewerage system budgets and rates	No Objection
6016	2/24/2010	Letter from City of Detroit Water and Sewerage Department re Board of Water Commissioners public hearing presentations to Detroit City Council on proposed FY 2010/11 water and sewerage system budgets and rates	No Objection
6017	2/23/2011	Letter from City of Detroit Water and Sewerage Department re Board of Water Commissioners public hearing presentations to Detroit City Council on proposed FY 2011/12 water and sewerage system budgets and rates	No Objection
6018	2/22/2012	Letter from City of Detroit Water and Sewerage Department re Board of Water Commissioners public hearing presentations to Detroit City Council on proposed FY 2012/13 water and sewerage system budgets and rates	No Objection

Exhibit Number	Date	Exhibit Description	Objection
6019	2/27/13	Letter from City of Detroit Water and Sewerage Department re Board of Water Commissioners public hearing presentations to Detroit City Council on proposed FY 2013/14 water and sewerage system budgets and rates	No Objection
6020		Conway McKenzie spreadsheets with DWSD	No Objection
6021		Conway McKenzie spreadsheets with DWSD	No Objection
6022	4/17/2014	Detroit Free Press, "Can Macomb County afford separate water-sewer system? Studies under way"	Hearsay; Speculation; Relevance
6023	6/24/2014	Detroit Free Press, "Grosse Point Park may go it alone with $15M water plant"	Hearsay; Speculation; Relevance
6024	9/24/2013	DWSD 10 Year CIP, OHM Advisors ("OHM Report")	No Objection
6025	2/26/2014	DWSD Asset Management Program presentation (EMA)	Hearsay
6026	06/00/14	DWSD Comprehensive Water Master Plan	No Objection
6027	10/2/2013	DWSD Draft 10-Year Business Plan (Conway MacKenzie)	No Objection
6028	1/13/2014	DWSD Finance Committee Binder	No Objection
6029	2/18/2014	DWSD Finance Committee Binder	No Objection
6030	5/19/2014	DWSD Finance Committee Binder	No Objection
6031	6/17/2014	DWSD Finance Committee Binder	No Objection

Exhibit Number	Date	Exhibit Description	Objection
6032	7/14/2014	DWSD Finance Committee Binder	No Objection
6033	7/17/2014	DWSD Financial Feasibility report (Draft)	No Objection
6034	5/19/2014	DWSD Preliminary Audit Results Year ended June 30, 2013	No Objection
6035	3/13/2013	DWSD Root Cause Committee Final Report	No Objection
6036	10/00/2003	DWSD Wastewater Master Plan	No Objection
6037		DWSD's' current rate schedules (www.dwsd.org)	No Objection
6038	8/6/2014	Email from T. Buckles to C. Porter et al. re: Non-Revenue Flows (WTPs Meter Project Follow-up), attaching Water Supply System Sales Analysis - Historical	Hearsay; Foundation
6039	7/24/2014	Evaluation of Recent DWSD Capital Improvement Plan Projections by FK Engineering Associates ("FKE Analysis")	Hearsay; Foundation
6040		Expert Report of Daniel J. Hartman	Hearsay
6041		Expert Report of Joseph Esuchanko	Hearsay
6042		Expert Report of Michael Nadol	Hearsay
6043		Expert Report of Thomas Terry	Hearsay
6044		Expert Report of William C. "Kriss" Andrews	Hearsay
6045		Expert Report of William G. Stannard, P.E.	Hearsay

Exhibit Number	Date	Exhibit Description	Objection
6046	5/16/2014	Federal Reserve Bank of Philadelphia, Survey of Professional Forecasters, Second Quarter release	Hearsay; Relevance
6047	12/12/2013	Fitch Ratings, "2014 Water and Sewer Medians"	Hearsay
6048	5/30/2014	Fitch Ratings, "Fitch Maintains Watch Negative on Detroit, Michigan's Water & Sewer Revs"	Hearsay
6049		Corrected Fifth Amended Plan for the Adjustment of Debts of City	No Objection
6050	5/5/2014	Fourth Amended Chapter 9 Plan for the Adjustment of Debts of the City of Detroit (with exhibits)	No Objection
6051	5/5/2014	Fourth Amended Disclosure Statement with Respect to Fourth Amended Plan for the Adjustment of Debts of the City of Detroit	No Objection
6052	12/20/2013	ITWG Report - Response to DWSD 10-Year Capital Improvement Plan (Draft - Confidential)	Hearsay; Foundation
6053	4/1/2014	Karegnondi Water Authority, Water Supply System Bonds (Karegnondi Water Pipeline), Series 2014A Official Statement	Hearsay; Relevance
6054	6/29/2012	Letter from S. McCormick to W. Creal re: Updated Evaluation of City of Detroit Financial Capability	No Objection

Exhibit Number	Date	Exhibit Description	Objection
6055	4/17/2014	Macomb Daily, "Macomb County eyes own Water/Sewer Department"	Hearsay; Relevance; Speculation
6056	4/14/2014	Memorandum from Bart Foster, The Foster Group, to Nicolette Bateson, "FY2014-15 Detroit Retail Rate Recommendations"	No Objection
6057	11/19/2013	Moody's Investors Service, "Rating Update: Moody's confirms Detroit's (MI) Water Enterprise revenue ratings at B1 senior lien, B2 second lien, outlook negative "	Hearsay
6058	6/5/2014	Oakland County Water Resources Commissioner, Oakland County, MI "Report on Water Supply and Wastewater Independence"	Hearsay
6059		OHM Report to ASI Analysis - Simple Bridge	Hearsay; Foundation
6060	3/13/2014	Phase 1 Interim Report – Priorities for 2015 to 2020 – Draft Report by CDM Smith prepared under the Water Master Plan Update (DWSD Contract No. CS-1528)	No Objection
6061	2/18/2014	Program to Address Delinquent Accounts, Darryl A. Lattimer memo	No Objection
6062	7/24/2014	Review of the DWSD Capital Improvement Programs by Applied Science, Inc. ("ASI Analysis")	Hearsay; Foundation

Exhibit Number	Date	Exhibit Description	Objection
6063	7/15/2014	SEMCOG, 2040 Regional Forecast Report	Hearsay
6064	6/00/2002	SEMCOG, Historical Population and Employment by Minor Civil Division, Southeast Michigan	Hearsay
6065	12/00/2012	SEMCOG, Population and Household Estimates for Southeast Michigan	Hearsay
6066	04/00/2012	SEMCOG, Southeast Michigan 2040 Forecast Summary, Revised	Hearsay
6067	02/00/2014	SEMCOG, Strategic Investment in Water and Sewer Infrastructure	Hearsay
6068	6/20/2012	Sewage Disposal System Revenue and Revenue Refunding Bonds, Series 2012(A)	No Objection
6069		Supplement - Summary Comparison (Andrews Dep. Ex. 6)	Hearsay
6070	Late 2013	TM-13: Water Treatment Plant Needs Assessment (CDMSmith)	No Objection
6071	00/00/2012	U.S. Census Bureau, 2012 American Community Survey (Detroit city, and counties comprising Detroit MSA)	No Objection
6072	00/00/2000	U.S. Census Bureau, Census 2000 and 1990 (Ranking Tables for Population of Metropolitan Statistical Areas)	No Objection

Exhibit Number	Date	Exhibit Description	Objection
6073	2000 & 2010	U.S. Census, 2000 and 2010	No Objection
6074	00/00/1997	U.S. EPA, Combined Sewer Overflows, Guidance for Financial Capability Assessment and Schedule Development	No Objection
6075	6/5/2014	Water Supply and Wastewater Independence Report, Applied Science, Inc., Draft	Hearsay; Foundation
6076	1/31/2003	Water Supply System Revenue and Revenue Refunding Bonds, Series 2003-D	No Objection
6077	12/20/2011	Water Supply System Revenue and Revenue Refunding Bonds, Series 2011-A, 2011-B, 2011-C	No Objection
6078	9/9/2011	Opinion and Order Denying Without Prejudice the City of Detroit's Motion to Dismiss	Relevance
6079	6/30/2013	City of Detroit Water Fund - Basic Financial Statements, prepared by KPMG	No Objection
6080	6/30/2013	City of Detroit Sewage Disposal Fund - Basic Financial Statements, prepared by KPMG	No Objection
6081	8/29/1984	Agreement for Use of Certain Detroit Sewers for the Evergreen-Farmington District with Exhibit A - Map of Area with related correspondence/amendments	No Objection
6082	5/5/1986	Water Service Agreement	No Objection

Exhibit Number	Date	Exhibit Description	Objection
6083	2/5/1968	Wastewater Disposal Agreement with related correspondence/amendments/summary	No Objection
6084	12/30/1958	Evergreen-Farmington Sewage Disposal Agreement with related correspondence/amendments/resolutions/contracts	No Objection [Duplicative - this an exhibit to 5/5 Disclosure Statement]
6085	5/6/1963	Water Service Agreement re: Farmington Township with related correspondence/amendments/resolutions	No Objection [Duplicative - this an exhibit to 5/5 Disclosure Statement]
6086	11/20/2009	Water Service Contract with related meeting minutes/resolutions	No Objection
6087	6/2/1966	Water Service Agreement re: Keego Harbor with related correspondence	No Objection
6088	10/22/2009	Wastewater Disposal Services Contract - Oakland - Macomb Interceptor Drain Drainage District with related correspondence	No Objection
6089		DWSD Current and Historical Financial Infomration	No Objection
6090		DWSD Financial Projections	No Objection
6091	5/14/2014	Article - Detroit falls apart: Another giant sinkhole big enough to swallow a car appears in blighted city	Hearsay; Speculation; Relevance

ATTACHMENT K

THE MACOMB PARTIES' CONSOLIDATED
(1) WITNESS LIST AND (2) EXHIBIT LIST

The Macomb Parties hereby identify the following individual that they will call as a fact witness at the Confirmation Hearing:

1.	Jason Matteo, Chief Engineer—Wastewater Services, Macomb County Public Works Office

The Macomb Parties hereby identify the following individuals that they may call as fact witnesses at the Confirmation Hearing:

1.	Sue F. McCormick
2.	Nicolette Bateson
3.	Bart Foster
4.	Cynthia Thomas
5.	Kevyn D. Orr
6.	Kenneth A. Buckfire
7.	Charles M. Moore
8.	Gaurav Malhotra

9.	Glenn D. Bowen
10.	Vyto Kaunelis
11.	Lee Donner
12.	James Doak
13.	Judith Kermans, Gabriel Roeder Smith
14.	Mayor Mike Duggan

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
5000	5/5/2014	Claim No. 3683		MIDDD Proof of Claim, Claim No. 3683	
5001	5/5/2014	Docket No. 4391		Fourth Amended Disclosure Statement with Respect to Fourth Amended Plan for the Adjustment of Debts of the City of Detroit and related exhibits	
5002	5/5/2014	Docket No. 4392		**Fourth Amended Plan for the Adjustments of Debts of the City of Detroit**	
5003	5/12/2014	Docket No. 4636		Objection of County Of Macomb, Michigan, By and Through Its County Agency, The Macomb County Public Works Commissioner, and The Macomb Interceptor Drain Drainage District To Fourth Amended Plan For The Adjustment of Debts of The City of Detroit and The Assumption of Sewer Contracts	
5004	5/26/2014	Docket No. 5034		Consolidated Reply to Certain Objection to Confirmation of Fourth Amended Plan for the Adjustment of Debts of the City of Detroit	

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
5005	6/16/2014			Detroit's Identification of 30(b)(6) witnesses	
5006	6/30/2014	Docket No. 5692		Brief In Support of Standing of County Of Macomb, Michigan, By and Through Its County Agency, The Macomb County Public Works Commissioner, To Object To Fourth Amended Plan For The Adjustment of Debts of The City Of Detroit	
5007	7/21/2014	Docket No. 6179		Declaration of Michael J. Paque Regarding the Solicitation and Tabulation of Votes On, and the Results of Voting with Respect to, Fourth Amended Plan for the Adjustment of Debts of the City of Detroit	
5008	7/29/2014	Docket No. 6379		Corrected Fifth Amended Plan for the Adjustment of Debts of the City of Detroit and related exhibits	
5009	8/12/2014	Docket No. 6666		Supplemental Objection of County Of Macomb, Michigan, By and Through Its County Agency, The Macomb County Public Works Commissioner, and The Macomb Interceptor Drain Drainage District To Fifth Amended Plan For The Adjustment of Debts of The City of Detroit and The Assumption of Sewer Contract	
5010	9/30/2009	Docket No.	Docket No.	Macomb-OMI Agreement	

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
		5692, Pg. 189	5692, Pg. 207		
5011	10/22/2009	MCOPW01 4235	MCOPW01 4251	OMI-Detroit Agreement	
5012		McCormick Exhibit No. 35		DWSD Fact Sheet	
5013				Bylaws for the Detroit Water and Sewerage Department Board of Water Commissioners (including District Court orders attached thereto and incorporated therein) (Publically available at: DWSD.org)	
5014				City Charter (Publically available at: http://www.detroitmi.gov/Portals/0/docs/legislative/cityclerk/calendar_2011/Charter%20Commission/Charter%20Word%20ver%20in%20pdf%20file_%2012_1Word.pdf)	
5015	8/18/1975	Case No. 77-cv-71100, Docket No. 2376-1		Documents filed in *United States v. City of Detroit, et. al.* (the "Clean Water Act Case") regarding City's Equity Stake, filed 8/8/2011	
5016	5/1/1978	Case No. 77-cv-		Report and Recommendation of the Masters filed in the Clean Water Act Case on	

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
		71100, Docket No. 2376-2		8/8/2011	
5017	9/9/2011	Case No. 77-cv-71100, Docket No. 2397		Opinion & Order Denying without Prejudice the City of Detroit's Motion to Dismiss in the Clean Water Act Case	
5018	11/2/2011	Case No. 77-cv-71100, Docket No. 2410-1 (Orr Exhibit No. 2)		Letter to Ottenwess re DWSD Root Cause Committee filed in the Clean Water Act Case	
5019	11/4/2011	Case No. 77-cv-71100, Docket No. 2410		Order adopting plan of Root Cause Committee filed in the Clean Water Act Case	
5020	3/1/2013			NPDES Permit No. MI0022802 (Publically available at: http://www.dwsd.org/downloads_n/about_dwsd/npdes/dwsd_wwtp_npdes_permit.pdf)	

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
5021	7/8/2011			Administrative Consent Order No. ACO-00131 between DWSD and the Michigan Department of Environmental Quality, Water Resources Division (Publically available at: http://www.michigan.gov/documents/deq/deq-wrd-npdes-DSWD-ACO_415429_7.pdf)	
5022	3/27/2013	Case No. 77-cv-71100, Docket No. 2528 (Orr Exhibit No. 4)		Opinion & Order terminating / closing the Clean Water Act Case	
5023	3/13/2013	MCOPW006572	MCOPW006582	Fausone to Ottenwess enclosing Root Committee Final Report	
5024	3/26/2013	POA00039495	POA00039497	Doak to Headen re Root Cause Committee Report	The City objects on these grounds: hearsay; incomplete
5025	12/15/2010			First Superseding Indictment, *United States of America v. Kilpatrick, et al.,* Case No. 10-20403	The City objects on these grounds: relevance
5026	3/8/2013			Jury Verdict Forms, *United States of America v. Kilpatrick, et al.,* Case No. 10-20403	The City objects on these grounds:

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
					relevance
5027	2/15/2012			Fourth Superseding Indictment, *United States of America v. Kilpatrick, et al.,* Case No. 10-20403	The City objects on these grounds: relevance
5028	8/14/2013	POA 0003008	POA00003009	Email from Sedlack re Discussion Draft of DWSD Term Sheet	
5029	8/13/2013	POA0003012	POA00003015	GLWA Term Sheet	
5030	10/2/2013	POA00295013	POA00295014	Email from Sedlack re DWSD Revised Discussion Draft of Lease	
5031	10/2/2013	POA00295017	POA00295061	Discussion Draft Agreement for Lease, Operation and Maintenance of Water Supply and Sewage Disposal Systems between the City of Detroit and GLWA	
5032	10/2/2013	POA00107117	POA00107166	DRAFT Analysis of New Water/Sewer Authority	
5033	January 2014	MCOPW013542	MCOPW013550	MOU re the Formation of the Great Lakes Water and Sewer Authority (Final Review Draft)	
5034	January 2014	MCOPW013526	MCOPW013541	Appendix to MOU re the Formation of the Great Lakes Water and Sewer Authority (Final Review Draft)	
5035	4/7/2014	MCOPW000392	MCOPW000412	Request for Information for Potential Operators of DWSD	

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
5036	12/20/2013	POA00043561	POA00043618	The Inter-County Technical Working Group Report	The City objects on these grounds: Hearsay
5037	9/24/2013	POA00385281	POA00385326	OHM Capital Needs Plan	
5038	4/15/2014	POA00319690	POA00319700	CIP Monthly Executive Status Report	
5039	12/18/2013	POA00336731	POA00336772	FY 2015 Water Supply System CIP	
5040	12/4/2013	POA00062877	POA00062918	FY 2015 Water Supply System CIP	
5041	12/4/2013	POA00062946	POA00062984	FY 2015 Sewage Disposal System CIP	
5042	12/18/2013	POA00336692	POA00336730	FY 2015 Sewage Disposal System CIP	
5043	7/9/2014			Amended FY 2015 Sewage Disposal System CIP (Publically available at: http://www.dwsd.org/downloads_n/about_dwsd/cip/sewer_fy_2015_cip_bowc_approved_2013-12-18.pdf)	
5044	8/29/2013	MCOPW005030	MCOPW005030	Kaunelis to Matteo re DWSD 10 Yr CIP	
5045	11/18/2013	POA00321876	POA00321876	DWSD CIP Comparison 1/13 to 1/14	

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
5046		POA00321870	POA00321874	Water Supply System CIP Observations	
5047	December 2013	POA00604157	POA00604161	NASRA Issue Brief, updated December 2013	The City objects on these grounds: Hearsay
5048	3/18/2013	POA00600884	POA00600888	NASRA Issue Brief, updated March 2013	The City objects on these grounds: Hearsay
5049	April 2014	Perry Exhibit No. 6		NASRA Issue Brief, updated March 2014	The City objects on these grounds: Hearsay
5050	6/26/2014	Bowen Exhibit No. 14		Public Fund Survey	The City objects on these grounds: Hearsay
5051	October 2012	Bowen Ex. 5		Milliman 2012 Public Pension Funding Study October 2012	
5052	November 2013	Perry Exhibit No. 6		Milliman 2013 Public Pension Funding Study	
5053	2/7/2012	Perry Exhibit No. 10		Milliman California State Teachers' Retirement System Experience Analysis	
5054	9/18/2013	Perry Exhibit No.		Milliman Oregon Public Employees Retirement System 2012 Experience Study	

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
		11			
5055	December 2005	Terry Exhibit No. 2		Actuarial Standards Board Risk Classification	
5056	September 2013	Bowen Exhibit No. 20		Actuarial Standards Board Selection of Economic Assumptions for Measuring Pension Obligations	
5057	5/1/2011	Bowen Exhibit No. 21		Actuarial Standards Board Measuring Pension Obligations and Determining Pension Plan Costs or Contributions	
5058	6/30/2007	POA00129518	POA00129566	GRS Actuarial Valuation	
5059	6/30/2008	POA00044837	POA00044885	GRS Actuarial Valuation	
5060	6/30/2012	POA00275794	POA00275846	GRS Actuarial Valuation	
5061	6/30/2013	Bowen Exhibit No. 22		GRS Actuarial Valuation	
5062	Undated	POA00602884	POA00602884	GRS/PFRS Actuarial Assumed rates of return / Calendar rates of return	
5063	2/17/2009	Kermans Exhibit No. 5		City of Detroit General Retirement System 5-year Experience Study July 1, 2002 through June 30, 2007	The Retirees' Committee objects on these grounds:

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
					Relevance, Hearsay, Rule 403
5064	3/6/2013	POA00626447	POA00626466	GRS Meeting Materials	
5065	8/2/2013	Thomas Exhibit No. 8		5 Questions with Cynthia Thomas, DRS	The Retirees' Committee objects on these grounds: Hearsay, Rule 403
5066	7/6/2012	POA00260505	POA00260522	Milliman to Detroit re Pension	
5067	7/18/2012	POA00261017	POA00261019	Milliman to Andrews re Phase 2 Assessment	
5068	11/16/2012	POA00260237	POA00260242	Milliman to Andrews re DGRS Simple Projection 2012 to 2017	
5069	1/28/2013	POA00258685	POA00258695	Milliman to Andrews re DGRS Simple Projection CET Changes	
5070	4/18/2013	POA00221957	POA00221961	Milliman to Miller re Adjusted Funded Status	
5071	5/20/2013	POA00222046	POA00222052	Milliman to Miller re DGRS Simple 10 Yr Projection	
5072	6/3/2013	POA00260055	POA00260063	Milliman to Miller re DGRS Simple 10 Yr Projection	
5073	6/14/2013	POA00221998	POA00222017	Milliman to Miller re DGRS Simple 10 Yr Projection	

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
5074	10/3/2013	POA00260193	POA00260212	Milliman to Miller re DGRS Simple 10 Yr Projection	
5075	10/9/2013	POA00626550	POA00626550	Milliman Expected Return Model, Assumptions as of June, 30 2012	
5076	10/9/2013	POA00626551	POA00626551	Milliman Expected Return Model, Assumptions as of June, 30 2012	
5077	11/4/2013	POA00260254	POA00260260	Milliman Ltr re Rec Investment Return Assumption as of June 30, 2013 for DGRS	
5078	11/4/2013	POA00260302	POA00260308	Milliman to Miller re Recommended Investment Return Assumption as of June 30, 2013 for DPFRS	
5079	11/19/2013	POA00260270	POA00260283	Milliman to Miller re DGRS Rough Plan Termination Estimate	
5080	11/26/2013	POA00260247	POA00260253	Milliman to Miller re DGRS Est Liability	
5081	12/7/2013	POA00260356	POA00260362	Milliman to Miller re DGRS Est Liability	
5082	12/18/2013	POA00260345	POA00260355	Milliman to Miller re DGRS Est Liability	
5083	12/19/2013	POA00260371	POA00260379	Milliman to Miller re DGRS Est Liability	
5084	1/8/2014	POA00258717	POA00258729	Milliman to Miller re DGRS Est Liability	
5085	1/9/2014	POA002586	POA002586	Milliman to Miller re DGRS Unfunded	

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
		96	99	Liability	
5086	1/16/2014	POA002587 00	POA002587 08	Milliman to Miller re DWSD Estimated Emp Contr 13-23	
5087	1/16/2014	POA002587 48	POA002587 56	Milliman to Miller re DGRS 10 Yr Dollar Payments	
5088	2/28/2014	POA002589 56	POA002589 66	Milliman to Miller re DWSD Est Emp Contr 13 to 23	
5089	2/28/2014	POA002590 01	POA002590 11	Milliman to Miller re DGRS 10 Yr Dollar Payments	
5090	3/6/2014	POA002604 43	POA002604 47	Milliman Memo re Proposed Benefit Modeling	
5091	3/28/2014	POA002592 55	POA002592 65	Milliman to Miller re DWSD Estimated Employer Contr 13-23	
5092	3/28/2014	POA002592 77	POA002592 87	Milliman to Miller re DGRS 10 Yr Dollar Payments	
5093	3/31/2014	POA002592 45	POA002592 54	Milliman to Miller re DWSD Estimated Employer Contr 13-23	
5094	5/5/2014	POA002599 86	POA002600 02	Milliman Ltr re DPFRS Individual Claim Allocation	
5095	4/8/2014	POA002594 17	POA002594 30	Milliman to Miller re Stochastic Modeling of Hypothetical Crediting Rate Formulas on Annuity Savings Fund Balances	
5096	4/10/2014	POA002595 44	POA002595 57	Milliman to Miller re DGRS Estimated Liability 6/30/14	

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
5097	4/14/2014	POA00259476	POA00259499	Milliman to Miller re DGRS Estimated Liability 70% Funded	
5098	4/17/2014	POA00259594	POA00259605	Milliman Ltr re DGRS Actuarial Accrued Liability as of June 30, 2013	
5099	4/25/2014	POA00259371	POA00259394	Milliman to Miller re DGRS Estimated Emp Contr 2014-2015	
5100	4/25/2014	POA00259901	POA00259910	Milliman Ltr reDGRS	
5101	5/5/2014	POA00259932	POA00259950	Milliman Ltr re DGRS Individual Claim Allocation	
5102	5/7/2014	POA00259896	POA00259924	Milliman to Miller re Estimated funded status 2033 2043 (series of letters)	
5103	6/3/2014	POA00727236	POA00727266	Milliman letter re DGRS Est Emp Contr 2014-2015 to 2022-2023	
5104	6/10/2014	POA00700464	POA00700495	Milliman DGRS Est Emp Contr	
5105	6/10/2014	POA00727267	POA00727298	Milliman letter re DGRS Est Emp Contr 2014-2015 to 2022-2023	
5106	6/10/2014	POA00727299	POA00727330	Milliman letter re DGRS Est Emp Contr	
5107	7/22/2014	POA00727351	POA00727388	Milliman letter re DGRS Est Funded Status and Unfunded Liability in 2023	
5108	6/22/2012	POA00414943	POA00415028	N. Foster to B. Foster re OS Tables	The City does not object but states

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
					that the document is incomplete and should include attachments
5109	6/30/2012	POA00245504	POA00245541	City of Detroit Sewage Disposal Fund Basic Financial Statements	
5110	September 2012	POA00063740	POA00063818	Competitive Assessment & Gap Analysis	The City objects on these grounds: Hearsay
5111	February 2013	POA00042378	POA00042395	Materials re Assessment of City Assets	
5112	March 2013	POA00231737	POA00231755	Investment Policy Statement Review	
5113	5/12/2013	POA00649726	POA00649769	City of Detroit Fin and Operating Plan	
5114	6/14/2013	POA00215882	POA00216015	City of Detroit Proposal for Creditors	
5115	10/2/2013	POA00107044	POA00107116	DWSD 10 Yr Business Plan	
5116	10/18/2013	OAK0005134	OAK0005139	City of Detroit: DWSD Oakland County Business Issues Memo Conway/Buckfire Response	
5117	10/21/2013	POA00010334	POA00010344	Haggard to Daddow re Conway Buckfire reports	The Retirees' Committee objects

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
					on these grounds: Hearsay
5118	December 2013	OAK0002064	OAK0002068	Analysis of DWSD Savings	
5119	12/4/2013	POA00116271	POA00116272	Fox to Buckfire re DWSD Opportunity United Water	
5120	1/2/2014	OAK0009680	OAK0009705	Comparison of DWSD Frameworks	
5121	2/25/2014	MCOPW021313	MCOPW021327	DWSD County Business Plan Due Diligence Process	
5122	3/27/2014	POA00557442	POA00557447	Email Communication	The City objects on these grounds: Hearsay
5123	4/1/2014	POA00337557	POA00337559	Bateson to Foster re files	The City objects on these grounds: Hearsay
5124	4/17/2014	OAK0010989	OAK0011008	Oakland County to Orr re Authority	The City and the Retirees' Committee objects on these grounds: Hearsay
5125	5/1/2014	POA00270585	POA00270591	DWSD Debt Restructuring Summary	
5126	5/30/2014	Foster		Fitch Maintains Watch Negative on Detroit	The City objects on

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
		Exhibit No. 6			these grounds: Hearsay
5127	6/10/2014	Nadol Exhibit No. 7		Proposed FY 2014-15 DWSD Rates and Charges	
5128	7/14/2014	Bateson Exhibit No. 7		BOC Fin Comm Agenda	
5129	7/17/2014	Orr Exhibit No. 18		The Foster Group Feasibility Report	
5130	7/29/2014	Mayor Duggan Exhibit No. 12		Detroit News Web Page "Orr Gives Control of Detroit's Water Department to Mayor"	The City objects on these grounds: Hearsay; Relevance; Foundation
5131	Undated	POA00678911	POA00678916	Draft Summary of Proposal Responses of Discussions - Goldman - Citi-Barclays	
5132	Undated	POA00706603	POA00706611	40 Yr projections as updated	
5133	11/8/2013	Docket No. 1; Bankr. E.D. Mich. No. 13-05310-swr		Ambac Assurance Corporation Complaint	The City objects on these grounds: Relevance

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
5134	11/8/2013	Docket No. 3; Bankr. Court Mich. No. 13-05310-swr		Exhibit A – City of Detroit Proposals to Voters	The City objects on these grounds: Relevance
5135	11/8/2013	Docket No. 4; Bankr. Court Mich. No. 13-05310-swr		Exhibit B – Michigan Constitution of 1963, Article IX, Section 6	The City objects on these grounds: Relevance
5136	11/8/2013	Docket No. 5; Bankr. Court Mich. No. 13-05310-swr		Exhibit C – Revised Municipal Finance Act	The City objects on these grounds: Relevance
5137	11/8/2013	Docket No. 6; Bankr. Court Mich. No. 13-05310-swr		Exhibit D – The Bond Resolutions	The City objects on these grounds: Relevance
5138	11/8/2013	Docket No. 7; Bankr. Court Mich. No. 13-		Exhibit E – The Home Rule City Act	The City objects on these grounds: Relevance

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
		05310-swr			
5139	11/8/2013	Docket No. 8; Bankr. Court Mich. No. 13-05310-swr		Exhibit F – Local Financial Stability and Choice Act	The City objects on these grounds: Relevance
5140	11/8/2013	Docket No. 9; Bankr. Court Mich. No. 13-05310-swr		Exhibit G – City of Detroit Proposal for Creditors	The City objects on these grounds: Relevance
5141	11/8/2013	Docket No. 10; Bankr. Court Mich. No. 13-05310-swr		Exhibit H-I – Specimens of the Ambac-Insured Bonds	The City objects on these grounds: Relevance
5142	11/8/2013	Docket No. 11; Bankr. Court Mich. No. 13-05310-swr		Exhibit H-I – Specimens of the Ambac-Insured Bonds	The City objects on these grounds: Relevance
5143	11/8/2013	Docket No. 12; Bankr. Court Mich.		Exhibit I – The Sale Orders	The City objects on these grounds: Relevance

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
		No. 13-05310-swr			
5144	11/8/2013	Docket No. 13; Bankr. Court Mich. No. 13-05310-swr		Exhibit J – The Ambac Policies	The City objects on these grounds: Relevance
5145	11/8/2013	Docket No. 14; Bankr. Court Mich. No. 13-05310-swr		Exhibit K – The Unlimited Tax Election Act	The City objects on these grounds: Relevance
5146	11/8/2013	Docket No. 15; Bankr. Court Mich. No. 13-05310-swr		Exhibit L – The Uniform Budgeting and Accounting Act	The City objects on these grounds: Relevance
5147	11/8/2013	Docket No. 16; Bankr. Court Mich. No. 13-05310-swr		Exhibit M – State of Michigan Attorney General Opinion	The City objects on these grounds: Relevance
5148	11/8/2013	Docket No. 23; Bankr.		Exhibit O – City of Detroit Ten-Year Plan	The City objects on these grounds:

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
		Court Mich. No. 13-05310-swr			Relevance
5149	12/9/2013	Docket No. 53; Bankr. Court Mich. No. 13-05310-swr		Motion to Dismiss Adversary Proceeding – City of Detroit	The City objects on these grounds: Relevance
5150	12/9/2013	Docket No. 54; Bankr. Court Mich. No. 13-05310-swr		Motion to Dismiss Adversary Proceeding – Individual Defendants	The City objects on these grounds: Relevance
5151	12/23/2013	Docket No. 57; Bankr. Court Mich. No. 13-05310-swr		Amended Complaint	The City objects on these grounds: Relevance
5152	12/23/2013	Docket No. 66; Bankr. Court Mich. No. 13-05310-swr		Exhibit I – Specimens of the Ambec-Insured Bonds	The City objects on these grounds: Relevance
5153	12/23/2013	Docket No.		Exhibit M-I – City of Detroit Comprehensive	The City objects on

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
		70; Bankr. Court Mich. No. 13-05310-swr		Annual Financial Report	these grounds: Relevance
5154	12/23/2013	Docket No. 71; Bankr. Court Mich. No. 13-05310-swr		Exhibit N – 2005 Limited Tax Bonds Official Statement	The City objects on these grounds: Relevance
5155	12/23/2013	Docket No. 72; Bankr. Court Mich. No. 13-05310-swr		Exhibit O-I – 2004 Unlimited Tax Bonds and Limited Tax Bonds Official Statement	The City objects on these grounds: Relevance
5156	12/23/2013	Docket No. 73; Bankr. Court Mich. No. 13-05310-swr		Exhibit P-I – City of Detroit Proposed Capital Agenda for Fiscal Years 2013-14	The City objects on these grounds: Relevance
5157	12/23/2013	Docket No. 74; Bankr. Court Mich. No. 13-05310-swr		Exhibit Q – Emergency Manager Order No. 12	The City objects on these grounds: Relevance

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
5158	12/23/2013	Docket No. 75; Bankr. Court Mich. No. 13-05310-swr		Exhibit R – Charter of the City of Detroit	The City objects on these grounds: Relevance
5159	12/23/2013	Docket No. 76; Bankr. Court Mich. No. 13-05310-swr		Exhibit S – City of Detroit Municipal Codes	The City objects on these grounds: Relevance
5160	1/17/2014	Docket No. 83; Bankr. Court Mich. No. 13-05310-swr		Motion to Dismiss Adversary Proceedings	The City objects on these grounds: Relevance
5161	2/11/2014	Docket No. 89; Bankr. Court Mich. No. 13-05310-swr		Response to Motion to Dismiss	The City objects on these grounds: Relevance
5162	2/17/2014	Docket No. 93; Bankr. Court Mich. No. 13-		Reply to Opposition to Defendants Motion to Dismiss	The City objects on these grounds: Relevance

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
		05310-swr			
5163	5/14/2014	P0A00442993	P0A00443014	CDM Smith - Water Master Plan Update, dated May 14, 2014	
5164	9/1/2013	POA00705745	POA00706414	Detroit Water and Sewerage Department, 2013 Needs Assessment for the Detroit Collection Systems and WWTP, dated September 2013	
5165	3/10/2014	POA00249261	POA00249266	Outline of DWSD Responses to Public Comments re: Proposed FY 2014-15 Water and Sewer Rates, dated March 10, 2014	
5166	6/30/2002	AGMC-NFPG-EXP_00003067	AGMC-NFPG-EXP_00003215	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2002	
5167	6/30/2003	AGMC-NFPG-EXP_00003216	AGMC-NFPG-EXP_00003378	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2003	
5168	6/30/2004	AGMC-NFPG-EXP_00003379	AGMC-NFPG-EXP_00003556	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2004	
5169	6/30/2005	AGMC-NFPG-	AGMC-NFPG-	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year	

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
		EXP_00003 557	EXP_00003 735	Ended June 30, 2005	
5170	6/30/2006			City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2006	
5171	6/30/2007	AGMC-NFPG-EXP_00003 736	AGMC-NFPG-EXP_00003 951	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2007	
5172	6/30/2008	AGMC-NFPG-EXP_00003 952	AGMC-NFPG-EXP_00004 175	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2008	
5173	6/30/2009	AGMC-NFPG-EXP_00004 176	AGMC-NFPG-EXP_00004 396	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2009	
5174	6/30/2010	AGMC-NFPG-EXP_00004 397	AGMC-NFPG-EXP_00004 633	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2010	
5175	6/30/2011	AGMC-NFPG-EXP_00004	AGMC-NFPG-EXP_00004	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2011	

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
		634	869		
5176	6/30/2012	AGMC-NFPG-EXP_00004870	AGMC-NFPG-EXP_00005114	City of Detroit, Michigan, Comprehensive Annual Financial Report, For the Fiscal Year Ended June 30, 2012	
5177	6/30/2013			Comprehensive Annual Financial Report For the Fiscal Year Ended June 30, 2013 (248 pages)	
5178	4/2/2014	MCOPW011730	MCOPW011740	Emails with Office of the Emergency Manager/Letter to Counties	
5179	8/8/2012			August 8, 2012 EMA Presentation by Director Sue McCormick, Publically available at: http://www.dwsd.org/downloads_n/about_dwsd/ema/ema_presentation_08082012.pdf	
5180	3/5/2013	POA0036947	P0A00369490	Combined Water and Sewer Financial Reports	
5181	5/28/2014	AGMC-NFPG-EXP_00000045	AGMC-NFPG-EXP_00000086	Letter from Sue F. McCormick to Detroit Board of Water Commissioners, re: Director's Report - May 2014	
5182	2/18/2014	POA00216877	POA00216880	Memorandum from Nicolette Bateson to Board of Water Commissioners Finance Committee, re: Preliminary FY 2013	

The Macomb Parties' Trial Exhibits					
Trial Exhibit #	***Date***	***Bates Begin***	***Bates End***	***Description***	***Objections***
				Unaudited Results, dated February 18, 2014	
5183	11/5/2013	POA00219643	POA00219653	Memorandum from Rate Simplification Work Group to Board of Water Commissioners, re: Rate Simplification Overview of Recommendations, dated November 5, 2013	
5184	11/13/2013	POA00248978	POA00248998	Critique of Financial Assumptions Underlying the Calculation of Proposed Lease Payment and Other Related Issues, Oakland County, Michigan, dated November 13, 2013	The City objects on these grounds: Hearsay
5185	10/2/2013	OAK0013980	OAK0014029	Detroit Water & Sewerage Dept., Analysis of New Water/Sewer Authority, dated October 2, 2013	
5186	1/13/2014	OAK0009552	OAK0009570	Email from Craig Hupp to Kenneth A. Buckfire, copying others, Re: DWSD Term Sheet Bodman Draft January 13.DOCX (including attachment)	The City objects on these grounds: Hearsay
5187	6/30/2009	POA00044886	POA00044935	GRS Actuarial Valuation	
5188	6/30/2010	POA00044936	POA00044986	GRS Actuarial Valuation	
5189	6/30/2011	POA00044987	POA00045036	GRS Actuarial Valuation	

EXHIBIT 2

Notice of Motion and Opportunity to Object [Not Required]

EXHIBIT 3

None [Brief Not Required]

EXHIBIT 4

Certificate of Service [To Be Separately Filed]