

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

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

DEBTOR'S NINTH OMNIBUS OBJECTION TO CERTAIN CLAIMS

(No Support Claims)

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD CAREFULLY REVIEW THIS OBJECTION AND LOCATE THEIR NAMES AND CLAIMS ON THE EXHIBIT ATTACHED TO THIS OBJECTION.

SPECIAL NOTICE REGARDING PENSION CLAIMS, RETIREE HEALTHCARE CLAIMS AND CERTAIN OTHER CLAIMS: THIS OBJECTION DOES NOT AFFECT ANY CLAIM (INCLUDING PENSION CLAIMS AND RETIREE HEALTHCARE CLAIMS) THAT IS NOT SUBJECT TO THE TREATMENT PROVIDED FOR CLAIMS IN CLASSES 3, 14 OR 15 UNDER THE PLAN. SEE PAGES 5-6 OF THIS OBJECTION FOR MORE INFORMATION.

The Debtor, the City of Detroit (the "City"), by and through its undersigned counsel, for its objection to claims (the "Objection") and its request for an order disallowing certain claims on the basis that they do not contain sufficient support for the City to determine their validity, substantially in the form attached hereto as Exhibit 1, respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Objection pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.



BACKGROUND FACTS

2. On July 18, 2013 (the “Petition Date”), the City filed a petition for relief in this Court, thereby commencing the largest Chapter 9 bankruptcy case in history.

3. Information regarding the City’s economic challenges and the events leading up to the filing of this case can be found in the *Declaration of Kevyn D. Orr in Support of City of Detroit, Michigan's Statement of Qualifications Pursuant to Section 109(c) of the Bankruptcy Code* filed on July 18, 2013 (Dkt. No. 11).

4. On December 5, 2013, this Court held that the City was eligible for relief under Chapter 9 of the Bankruptcy Code. *See Order for Relief Under Chapter 9 of the Bankruptcy Code* (Dkt. No. 1946).

5. On November 12, 2014, this Court entered an Order Confirming the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (Dkt. 8272) (the “Plan”).

6. The Plan became effective on December 10, 2014 (the “Effective Date”).

7. On November 21, 2013, this Court issued its *Order, Pursuant to Sections 105, 501, and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof* (Dkt. No. 1782) (the “Bar Date Order”) establishing deadlines to file certain proofs of claim in this case. The Bar Date Order set the deadline to file proofs of claim as February 21, 2014 at 4:00 p.m., Eastern Time (the “Bar Date”).

8. On July 9, 2014, this Court entered its *Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 3007 Approving Claim Objection Procedures* (Dkt. No. 5872) (the “Claims Procedures Order”), allowing the City to file an omnibus objection with respect to claims which were filed without supporting documentation which would allow the City to ascertain the validity of such claim. (Claim Procedures Order at 2.)

9. Each of the Claims listed on Exhibit 2 were filed without any supporting documentation.

10. Notwithstanding the fact that the claimants did not provide supporting documentation for their claims, the City searched the following data sources to attempt to ascertain the validity of each claim: the City's Vendor Database, the City's accounts payable records, the City's disbursement records, and the City's lists of active and retired employees (collectively the "Data Sources"). The City was unable to ascertain the validity of the listed claims.

RELIEF REQUESTED

11. The City files this Objection pursuant to the Bar Date Order, Sections 502(b) of the Bankruptcy Code¹, Rule 3007(c) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and the Claims Procedures Order, seeking entry of an order disallowing and expunging the claims set forth in Exhibit 2 annexed hereto because they were filed without sufficient supporting documentation to allow the City to ascertain the validity of each claim (the "No Support Claims"), even after a diligent search of the City's records.

12. To the extent the Court does not disallow one or more of the No Support Claims on the basis that they were filed without sufficient supporting documentation to allow the City to ascertain their validity, the City reserves all of its rights to object, on any basis, to any of the No Support Claims, beyond those bases set forth in this Objection.

BASIS FOR RELIEF REQUESTED

13. Only proofs of claim that comply with Bankruptcy Rule 3001 are presumed to be valid in the amount filed. Bankruptcy Rule 3001(f).

¹ Sections 502 of the Bankruptcy Code are made applicable to Chapter 9 proceedings through Section 901(a) of the Bankruptcy Code.

14. In order to meet the requirements of Rule 3001(f), a properly-filed proof of claim must contain the following: (1) the creditor's name and address; (2) the basis for the claims; (3) the date the debt was incurred; (4) the amount of the claim; (5) classification of the claim; and (6) supporting documents. *In re Hughes*, 313 B.R. 205, 209 (Bankr. E.D. Mich. 2004) (McIvor, J.) (citing *In re Dow Corning Corp.*, 250 B.R. 298, 321 (Bankr. E.D. Mich. 2000)).

15. The City has reviewed each of the No Support Claims, and the Data Sources. In each case, the City has confirmed that it is unable to ascertain the validity of the No Support Claims, even after it reviewed the Data Sources, in order to determine whether there is a potential basis for the claim.

16. The Declaration of John Naglick, a Finance Director with the City of Detroit (the "Declaration") explains the process undertaken by the City and confirms that none of the No Support Claims contain any documentation which allows the City to ascertain their validity. *See Declaration of John Naglick*, attached hereto as Exhibit 3.

17. The claimants who filed the No Support Claims have failed to meet the requirements of Bankruptcy Rule 3001(f) because they have failed to provide the required supporting documentation. Therefore, the No Support Claims should be disallowed and expunged.

18. The Claims Procedures Order and Bankruptcy Rule 3007(c) allow the City to file this Objection as an omnibus objection. Specifically, Bankruptcy Rule 3007(c) authorizes the Court to allow for omnibus objections beyond those circumstances itemized in Bankruptcy Rule 3007(d) and the Claims Procedures Order expressly permits the City to file an omnibus objection with respect to claims which were filed without sufficient documentation to allow the City to ascertain the validity of such claim. (Claims Procedures Order at 2.)

19. This Court has the authority to enter an order approving this Objection. Moreover, the streamlined process afforded by an omnibus objection (in lieu of individual objections to each No Support Claim), as well as the proper classification of such claims, will result in material costs savings that will inure to the benefit of the City. Furthermore, an important goal of the Bankruptcy Code will be met: only valid and verifiable claims against the City will be paid. Accordingly, the City believes that the relief sought by this Objection is in the best interests of the City and its creditors.

20. Based upon the foregoing, the City seeks entry of an order, substantially in the form annexed hereto as Exhibit 1, disallowing and expunging the No Support Claims. Accordingly, pursuant to section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007(c), the Court should grant the relief requested.

**NO EFFECT ON CLAIMS THAT ARE NOT SUBJECT TO TREATMENT IN
CLASSES 3, 14 OR 15 UNDER THE PLAN**

21. The City cannot in all cases determine the proper classification of the No Support Claims under the Plan because the No Support Claims were filed without adequate supporting documentation. Nevertheless, the City seeks the disallowance of the liabilities asserted in the No Support Claims solely to the extent such liabilities, if allowed, would be subject to treatment in Classes 3 (Other Secured Claims), 14 (Other Unsecured Claims) or 15 (Convenience Claims) under the Plan. The disallowance of the proofs of claim identified on Exhibit 2 shall have no effect on any types of claims – including, for example, Pension Claims² or OPEB³/Retiree

² “Pension Claims” are defined by the Plan as GRS Pension Claims or PFRS Pension Claims. Plan, Art. I.A.267.

³ “OPEB Claims” are defined by the Plan as any claims against the City for OPEB Benefits held by a retiree who retired on or before December 31, 2014 and is otherwise eligible for OPEB Benefits, and any eligible surviving beneficiaries of such retiree. Plan, Art. I.A.260. “OPEB Benefits” are post-retirement health, vision, dental, life and death benefits provided to retired employees of the City, the Detroit Public Library or the Detroit Regional Conventional Facility Authority and their surviving beneficiaries pursuant to the Employee Health and Life Insurance Benefit Plan, the Employees Death Benefit Plan or any comparable plan, including the members of the certified class in the action captioned *Weiler et al. v. City of Detroit*, Case No. 06-619737-CK (Wayne County

Healthcare Claims – that are specifically allowed in other classes pursuant to Plan or subject to other specific treatment under the Plan.

SEPARATE CONTESTED MATTERS

22. To the extent that a response is filed regarding any claim listed in this Objection and the City is unable to resolve the response, each one of such claims, and the objection by the City to each one of such claims asserted, shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding an objection asserted in this Objection shall be deemed a separate order with respect to each claim.

RESERVATION OF RIGHTS

23. The City files this Objection without prejudice to or waiver of its rights pursuant to section 904 of the Bankruptcy Code, and nothing herein is intended to, shall constitute or shall be deemed to constitute the City's consent, pursuant to section 904 of the Bankruptcy Code, to this Court's interference with (a) any of the political or governmental powers of the City, (b) any of the property or revenues of the City or (c) the City's use or enjoyment of any income-producing property.

NOTICE

24. The City has provided notice of this Objection to each of the claimants identified in Exhibit 2 at each address set forth in Exhibit 2, and all other parties who have requested notice pursuant to Bankruptcy Rule 2002. Each address reflects the address set forth by each of the claimants on its respective proof of claim. Given the nature of the relief requested, the City respectfully submits that no other or further notice of this Objection need be given.

Circuit Court), pursuant to the “Consent Judgment and Order of Dismissal” entered in that action on August 26, 2009. Plan, Art. I.A.259.

NO PRIOR REQUEST

25. No previous request for the relief requested herein has been made to this or any other court.

WHEREFORE, the City respectfully requests that this Court enter an order, substantially in the form annexed hereto as Exhibit 1, granting the relief requested herein and granting the City such other and further relief as this Court may deem just and proper.

Dated: February 13, 2015

FOLEY & LARDNER LLP

By: /s/ John A. Simon

John A. Simon (P61866)

Jeffrey S. Kopp (P59485)

Tamar N. Dolcourt (P73425)

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*Counsel for the Debtor, City of Detroit,
Michigan*

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

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

**NOTICE OF DEBTOR’S NINTH OMNIBUS OBJECTION TO CERTAIN CLAIMS
(No Support Claims)**

PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS HERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS YOUR CLAIM(S).

PLEASE TAKE NOTICE THAT the Debtor, the City of Detroit, (the “City”), by and through its undersigned counsel, has filed an objection to certain no support claims (the “Ninth Omnibus Objection”) and for an order disallowing and expunging such claims.

YOUR CLAIM MAY BE REDUCED, MODIFIED OR ELIMINATED.
PURSUANT TO FED. R. BANKR. P 3007(e)(1) AND PRIOR ORDERS OF THIS
COURT. YOU SHOULD REVIEW EXHIBIT 2 OF THE NINTH OMNIBUS
OBJECTION TO FIND YOUR NAME AND CLAIM. YOU SHOULD READ THESE
PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU
HAVE ONE.

If you do not want the court to eliminate or change your claim, or grant the relief request in the Ninth Omnibus Objection, then on or before **March 12, 2015**, you or your lawyer must:

1. File with the court, at the address below, a written response to the objection. Unless a written response is filed and served by the date specified, the court may decide that you do not oppose the objection to your claim.

Clerk of the Court
United States Bankruptcy Court
211 W. Fort Street, Suite 2100
Detroit, MI 48226

If you mail your response to the Court for filing, you must mail it early enough so that the Court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

2. A copy of your response must also be mailed to counsel for the City:

John A. Simon
Jeffrey S. Kopp
Tamar N. Dolcourt
Foley & Lardner LLP
500 Woodward Ave., Ste. 2700
Detroit, MI 48226

3. You must also attend the hearing on the objection scheduled to be held on **March 19, 2015** at 10:00 a.m. in Courtroom 236, Theodore Levin Courthouse, 231 W. Lafayette, Detroit, MI 48226 unless your attendance is excused by mutual agreement between yourself and the objector's attorney.

If you or your attorney do not take these steps, the court may decide that you do not oppose the objection to your claim, in which event the hearing will be canceled and the objection sustained.

Date: February 13, 2015

FOLEY & LARDNER LLP

By: /s/ John A. Simon
John A. Simon (P61866)
Jeffrey S. Kopp (P59485)
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*Counsel for the Debtor, City of Detroit,
Michigan*

EXHIBIT 1: PROPOSED ORDER

4842-6543-6960.10

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

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

**ORDER GRANTING DEBTOR'S
NINTH OMNIBUS OBJECTION TO CERTAIN CLAIMS**

(No Support Claims)

Upon the ninth omnibus objection to claims, dated February 13, 2015 (the "Objection"),¹ of the Debtor, City of Detroit, Michigan, (the "City"), seeking entry of an order disallowing certain claims filed with no supporting documentation; and it appearing that this Court has jurisdiction over the Objection pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Objection in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that the relief requested in the Objection is in the best interests of the City, and its creditors; and due and proper notice of the Objection having been given as provided in the Objection; and it appearing that no other or further notice of the Objection need be given; and a hearing on the Objection having been held before the Court; and any objections to the Objection having been overruled or withdrawn; and the Court finding that the legal and factual bases set forth in the

¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Objection.

Objection and at the hearing establish just cause for the relief granted; and after due deliberation and good and sufficient cause appearing therefore; it is hereby

ORDERED, DECREED AND ADJUDGED that:

1. The Objection is granted as set forth herein.
2. All of the proofs of claim listed on Exhibit 2 annexed to the Objection are disallowed and expunged, pursuant to Section 502(b).
3. The City's claims agent is hereby authorized to update the claims register to reflect the relief granted in this Order.
4. The City is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.
5. Each claim and the objections by the City to each claim as addressed in the Objection and set forth in Exhibit 2 constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each claim. Any stay of this Order shall apply only to the contested matter that involves such creditor and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby, and further provided that the City shall have the right to submit a separate order with respect to contested matters or claims.
6. Notice of the Objection as provided therein is good and sufficient notice of such objection, and the requirements of Bankruptcy Rule 3007(a) and the local rules of the Court are satisfied by such notice.

EXHIBIT 2: NO SUPPORT CLAIMS TO BE DISALLOWED

4842-6543-6960.10

NO SUPPORT CLAIMS

Claim No.	Creditor Name and Address	Claim Amount as Stated on Proof of Claim Form	Classification as Stated on Proof of Claim Form	Stated Basis of Claim as Stated on Proof of Claim Form
2534	Adler Stilman, PLLC Attn: Accounts Payable 30300 Northwestern Hwy, 3 rd Floor Farmington Hills, MI 48334	\$500,000	General Unsecured	<u>Stated Basis:</u> "Attorney Fees" No supporting documents attached.
491	Aj & Associates at Law Attn: Accounts Payable 400 Monroe 410 Detroit, MI 48226	\$50,000.00	General Unsecured	<u>Stated Basis:</u> "Civil Judgment/ Settlement before 7/18/13 (personal injury)" No supporting documents attached.
2362	Albert Chandler P.O. Box 85411 11380 Bramell Detroit, MI 48239	\$92,000.00	Admin Priority	<u>Stated Basis:</u> "Loss home in taxes" No supporting documents attached.
467	Albert H. Jenkins 6007 Marseilles Detroit, MI 48224	\$90,000.00	General Unsecured	No basis given and no supporting documents attached.
624	Anthony Petrilli, MD PC P.O. Box 361038 Grosse Pointe Farms, MI 48236	\$16,590.00	General Unsecured	<u>Stated Basis:</u> "medical services provided" No supporting documents attached.
650	Barbara Moore Family Trust Peggy M. Fasbender, Trustee 7708 Knotty Pine Court Woodridge, IL 60517	\$60,000.00	Secured	<u>Stated Basis:</u> "Bankruptcy" No supporting documents attached.
472	Berger Miller & Strager PC Attn: Accounts Payable 333 West Fort Street, Suite 1400 Detroit, MI 48226	In Excess of \$25,000 (Unliquidated)	General Unsecured	<u>Stated Basis:</u> "Attorney fees and costs owed on lawsuit pending against the City of Detroit" No supporting documents attached.

1181	Billy D. Harrington 28910 Monterey Dr. Southfield, MI 48076	\$5,254.00	Admin Priority	<u>Stated Basis:</u> “services performed and healthcare goods and services” No supporting documents attached.
3392	Brenda Bullock 5031 Lannod Detroit, MI 48236	\$11,000.00	Secured	<u>Stated Basis:</u> “City water and sewage – flooded my basement” No supporting documents attached.
56	Brenda Williams 17174 Bentler Detroit, MI 48219	Blank	General Unsecured	No basis given and no supporting documents attached.
2350	Brian Chaney 1881 W. Grand Blvd. Detroit, MI 48208	\$90,000.00	Secured	<u>Stated Basis:</u> “Mortgage note” No supporting documents attached.
146	Bromberg & Associates LLC Attn: Accounts Payable 3141 Cannif Hamtramck, MI 48212	\$307.12	General Unsecured	<u>Stated Basis:</u> “Braille Services Rendered” No supporting documents attached.
1252	Carlottie Shaw 13900 Lakeside Boulevard North Apt. 320 Shelby Township, MI 48315	Blank	General Unsecured	No basis given and no supporting documents attached.
2805	Clarence Dill 2203 N. LaSalle Gardens Detroit, MI 48206	\$166.72	General Unsecured	<u>Stated Basis:</u> “election day” No supporting documents attached.
803	Cynthia M. Zilinski 22810 Eastwood Warren, MI 48089	Blank	General Unsecured	No basis given and no supporting documents attached.

982	Darlene Starks 19579 Skyline Roseville, MI 48066	\$13,050.00	General Unsecured	<u>Stated Basis:</u> “financial loss” No supporting documents attached.
2708	Denise Williams 910 Seward Apt 310 Detroit, MI 48202	\$1,000.00	General Unsecured	<u>Stated Basis:</u> “Money from lost contract I didn’t receive” No supporting documents attached.
427	Dennis J. Carlson, sole beneficiary of Barbara Carlson (deceased) 4517 62 nd Ave SE Olympia, WA 98513	Blank	General Unsecured	No basis given and no supporting documents attached.
64	Deshawn Benson 18048 Pine E. Brownstown, MI 48193	Blank	General Unsecured	No basis given and no supporting documents attached.
597	Detroit Elevator Co. Attn: Accounts Payable 2121 Burdette Ferndale, MI 48220	\$301.77	General Unsecured	<u>Stated Basis:</u> “Services performed” No supporting documents attached.
2513	Dorothy Jean Roberson 10434 Lakepointe Street Detroit, MI 48224	\$3,500.00	General Unsecured	<u>Stated Basis:</u> “Title change; no money given 6-24-13” No supporting documents attached.
139	Family Care Transportation Inc. The Joseph Dedvukaj Firm P.C. 1277 W. Square Lake Rd Bloomfield Hills, MI 48382	\$8,000.00	General Unsecured	<u>Stated Basis:</u> “PIP Claim” No supporting documents attached.
399	Franklin Wright Settlements, Inc. Attn: Accounts Payable 3360 Charvoix Detroit, MI 48207	\$2,278.00	General Unsecured	<u>Stated Basis:</u> “Reimbursement for NOF grant services performed” No supporting documents attached.

1278	Grady A. Bishop 489 Henry, Apt 6 Detroit, MI 48201	\$6,000.00	Secured	<u>Stated Basis:</u> "lost my apt and car" No supporting documents attached.
53	Harold Adkins 54 Park Dr. Clawson, MI 48017	Blank	General Unsecured	No basis given and no supporting documents attached.
671	Henry Ford Health System Knight & Firth, P.C. Attn: Alison R. Krempa 335 E. Big Beaver Rd, Suite 101 Troy, MI 48083	\$9,687.02	General Unsecured	<u>Stated Basis:</u> "healthcare services" No supporting documents attached.
674	Henry Ford Health System Knight & Firth, P.C. Attn: Alison R. Krempa 335 E. Big Beaver Rd, Suite 101 Troy, MI 48083	\$5,861.00	General Unsecured	<u>Stated Basis:</u> "healthcare services" No supporting documents attached.
1290	Henry L. Jones 21252 Green Hill Road Farmington Hills, MI 48335	Blank	General Unsecured	No basis given and no supporting documents attached.
3434	Herbert Williams 1577 Sugar Maple Way West Bloomfield, MI 48324	Blank	General Unsecured	No basis given and no supporting documents attached.
3060	James Arthur Hickman III 20266 Kingsville Street Harper Woods, MI 48225	\$1,931.91	General Unsecured	<u>Stated Basis:</u> "imposed concession contract" No supporting documents attached.
874	Jane Slater 5 Shadow Lane Woodbury, NY 11797-2810	\$5,354.00	General Unsecured	<u>Stated Basis:</u> "BOT 6/4/08 20,000 for 20,604, sold 12/24/13 20,000 for 16,250 = loss -4,354" No supporting documents attached.

2874	Jecoliah Warren 19322 Marx Detroit, MI 48203	\$6,000.00	General Unsecured	<u>Stated Basis</u> : “out of class” No supporting documents attached.
45	Jeffery Cotton 14818 Keppen Allen Park, MI 48101	Blank	General Unsecured	No basis given and no supporting documents attached.
568	Jessie Robertson 4701 Lebanon Pike, B11D Hermitage, TN 37076	Blank	General Unsecured	No basis given and no supporting documents attached.
51	John Pittman 18487 Sunderland Detroit, MI 48219	Blank	General Unsecured	No basis given and no supporting documents attached.
2896	John Serda 501 N. Lafayette Dearborn, MI 48128	Blank	General Unsecured	<u>Stated Basis</u> : “employment discrimination” No supporting documents attached.
3376	Judy Patricia Moore 10701 Santa Maria, Apt 3.15 Detroit, MI 48221	\$957.62	General Unsecured	No basis given and no supporting documents attached.
544	Larry Hurwitz 2194 Caxton Ave Clermont, FL 34711	Blank	General Unsecured	No basis given and no supporting documents attached.
484	Lauren Nyx 18934 Algonac Detroit, MI 48234	\$129.97	General Unsecured	No basis given and no supporting documents attached.
2541	Linard M. MaLone 17320 Annott St. Detroit, MI 48205	\$9,831.17	General Unsecured	No basis given and no supporting documents attached.
3370	Louise Motley 18687 Pennington Dr. Detroit, MI 48221	Blank	General Unsecured	No basis given and no supporting documents attached.

3377	Mamie Stewart-Brown 23200 Orleans Place, Apt 4023 Southfield, MI 48033	\$600.00	General Unsecured	No basis given and no supporting documents attached.
2952	Marshell Germany- Lumas 20261 Sunset Detroit, MI 48234	15,800.00	Secured	<u>Stated Basis:</u> "Real estate" No supporting documents attached.
2964	Marvin Thornton 15878 Collingham Dr. Detroit, MI 48205	\$200,00.00	General Unsecured	No basis given and no supporting documents attached.
1172	Mary Jane James 13276 N. Norfolk Detroit, MI 48235	Blank	General Unsecured	<u>Stated Basis:</u> "services performed" No supporting documents attached.
3444	Michael D. Cade 2517 Webber St. Saginaw, MI 48601- 3650	Unliquidated	General Unsecured	<u>Stated Basis:</u> "Detroit bankruptcy" No supporting documents attached.
1787	Monique Stevens 18512 Santa Barbara Detroit, MI 48221	\$18,150.00	General Unsecured	<u>Stated Basis:</u> "Los[s] of financial income, forfeiture of contract given by City of Detroit" No supporting documents attached.
190	Moylan Energy Management LLC Attn: Accounts Payable 2575 S Haggerty Rd Canton, MI 48188	\$0	General Unsecured	<u>Stated Basis:</u> "None – never did business with City of Detroit" No supporting documents attached.
2686	New Grace Spinal Rehabilitation, PLLC Attn: Accounts Payable PO Box 156 Dryden, MI 48428	\$143,569.47	General Unsecured	<u>Stated Basis:</u> "Delivery of health care services related to personal injury" No supporting documents attached.

2876	Pamela A. Knott 34625 Mulvey, Apt. 243 Fraser, MI 48026	\$11,050.00	General Unsecured	No basis given and no supporting documents attached.
423	Pamela Thomas 10622 Beaconsfield St. Detroit, MI 48224-1736	\$112.00	Admin Priority	<u>Stated Basis:</u> “Personal Injury” No supporting documents attached.
3260	Priscilla Lovely 4821 Chalmers Detroit, MI 48215	\$3,800.00	General Unsecured	<u>Stated Basis:</u> “City of Detroit fail to pay” No supporting documents attached.
2458	Prodigy Spinal Rehabilitation Inc. Attn: Accounts Payable PO Box 156 Dryden, MI 48428	\$177,810.80	General Unsecured	<u>Stated Basis:</u> “delivery of healthcare services related to personal injury” No supporting documents attached.
149	Property Owner 18972 Muirland Detroit, MI 48221	\$156,000.00	Priority	<u>Stated Basis:</u> “Mortgage loan debt” No supporting documents attached.
2352	Property Owner 1935 Gladstone Detroit, MI 48206	\$80,000.00	General Unsecured	<u>Stated Basis:</u> “Mortgage note” No supporting documents attached.
921	Property Owner – Verlene Campbell 14599 Ardmore Detroit, MI 48227	\$77,000.00	General Unsecured	<u>Stated Basis:</u> “mortgage note is 972.00 per month” No supporting documents attached.
1298	Property Owner – Willie Walker 14440 Asbury Road Detroit, MI 48227	Blank	General Unsecured	No basis given and no supporting documents attached.

1282	Richard Davis 22578 East River Road Grosse Ile, MI 48138	\$4,080.00	General Unsecured	<u>Stated Basis:</u> “H2O, Sewage, Rubbish and Occupancy overcharges” [regarding parcel No. 06007558, 59 and 60] No supporting documents attached.
2725	Robert P. Cox, Jr. 4198 Burns St. Detroit, MI 48214	Blank	General Unsecured	No basis given and no supporting documents attached.
3395	Robert Rogers Davis 3980 Bebernich Lane Sterling Heights, MI 48310	\$90,578.00	General Unsecured	No basis given and no supporting documents attached.
1850	Roderic Walter P.O. Box 43249 Detroit, MI 48243-0249	\$7,500.00	General Unsecured	No basis given and no supporting documents.
1930	Shawn D. Miles II 4754 E Outer Drive Detroit, MI 48234	\$40,000.00	General Unsecured	No basis given and no supporting documents attached.
1020	Shirley Franklin 9684 Knodell Detroit, MI 48213	\$12,000.00	General Unsecured	<u>Stated Basis:</u> “finance loss” No supporting documents attached.
438	Spinal Care of Nevada Attn: Devin Luzod 601 Tandooni Ln Las Vegas, NV 89138	\$5,117.04	General Unsecured	<u>Stated Basis:</u> “work performed” No supporting documents attached.
57	Stephen A. Walton 5500 W. Outer Dr. Detroit, MI 48221	Blank	General Unsecured	No basis given and no supporting documents attached.
2019	Tanya L. Glover 18528 Reed St. Melvindale, MI 48122	\$5,000.00	General Unsecured	<u>Stated Basis:</u> “Services performed” No supporting documents attached.

1220	Timothy D. Johnson 9696 Wormer Redford, MI 48239	\$20,000.00	General Unsecured	<u>Stated Basis:</u> “monies owe to me” No supporting documents attached.
2786	Valerie Ann Colbert- Osamuade 24498 Martel Drive Farmington Hills, MI 48335	\$150,000.00	General Unsecured	<u>Stated Basis:</u> “Breach of implied contract, failure to indemnify under City Charter” No supporting documents attached.
2316	Valerie R. Lloyd 17400 Ilene St. Detroit, MI 48221	Blank	General Unsecured	No basis given and no supporting documents attached.
2504	Valesta Cato 9196 Wayburn Detroit, MI 48224	\$1,126.11	Priority	No basis given and no supporting documents attached.
2601	Van Dyke Spinal Rehabilitation Attn: Accounts Payable PO Box 156 Dryden, MI 48428	\$61,829.19	General Unsecured	<u>Stated Basis:</u> “delivery of health care services related to personal injury” No supporting documents attached.
54	Virnell McIntosh- Winston 27795 Dequindre, Apt 208 Madison Heights, MI 48071	Blank	General Unsecured	No basis given and no supporting documents attached.
2344	Walter Brown Jr. 14760 Mettetal Detroit, MI 48227	Blank	General Unsecured	No basis given and no supporting documents attached.
2511	William Gonte 29877 Telegraph Road Ste 200 Southfield, MI 48034	\$1,395.83	General Unsecured	<u>Stated Basis:</u> “delivery of health care services related to personal injury” No supporting documents attached.

753	Xcel Physical Therapy PLC Attn: Accounts Payable 351 S. Straits Hwy P.O. Box 829 Indian River, MI 49749	\$3,798.00	General Unsecured	<u>Stated Basis:</u> “physical therapy services for worker’s compensation patient, James English” No supporting documents attached.
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**EXHIBIT 3: DECLARATION OF JOHN NAGLICK REGARDING NO SUPPORT
CLAIMS**

4842-6543-6960.10

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

-----X	:	
IN RE	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
DEBTOR	:	Hon. Steven W. Rhodes
-----X	:	

**DECLARATION OF JOHN NAGLICK IN SUPPORT OF DEBTOR'S NINTH
OMNIBUS OBJECTION TO CERTAIN CLAIMS**

(No Support Claims)

I, John Naglick, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information and belief:

1. I am a Finance Director with the City of Detroit. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein.

2. The City's ongoing claims reconciliation process involves the collective effort of a team of employees assembled from personnel specifically familiar with the operations and liabilities of the City. This team works together and in conjunction with City's counsel, the City's financial advisor, and the City's claims agent, to review proofs of claim filed against the City (each, a "Claim" and collectively, the "Claims").

3. In connection with the preparation of the Ninth Omnibus Objection to Certain Claims (No Support Claims) (the "Ninth Omnibus Objection"), the City and its financial professionals reviewed the claims at issue, as described on Exhibit 2 of the Ninth Omnibus Objection. I have also personally reviewed the Ninth Omnibus Objection and the exhibits attached thereto. Accordingly, I am familiar with the information contained therein.

4. City employees, working with certain of the City's professionals, compared each of the claims listed in Exhibit 2 of the Ninth Omnibus Objection (the "No Support Claims") to the following City data sources in order to determine whether such claim may be valid and outstanding: the City's Vendor Database, the City's accounts payable records, the City's disbursement records, and the City's lists of active and retired employees (collectively the "Data Sources").

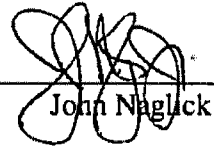
5. After comparing each of the No Support Claims to the Data Sources, the City is still unable to ascertain whether the No Support Claims are valid claims against the City.

[SIGNATURE PAGE FOLLOWS]

6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: 2/11, 2015

By: /s/



John Naglick