

April 13, 2015

FILED

In re

Bridget Murriel

3324 Hogarth

Detroit, MI 48206

Creditor

2015 APR 16 A 10: 34

U.S. BANKRUPTCY COURT
E.D. MICHIGAN-DETROIT

IN THE UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

Chapter 9

Case No. 13-53846

Hon. Thomas J. Tucker

Hon. Thomas J. Tucker

United States Bankruptcy Court

211 W. Fort Street, Suite 2100

Detroit, MI 48226

OBJECTION TO THE CONSOLIDATED REPLY IN SUPPORT OF MOTION OF THE CITY OF DETROIT, PURSUANT TO SECTIONS 105(A) AND 502(C) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3021, FOR AN ORDER APPROVING RESERVE AMOUNTS FOR CERTAIN DISPUTED OR UNLIQUIDATED UNSECURED CLAIMS IN CONNECTION WITH DISTRIBUTIONS TO BE MADE UNDER THE EIGHTH AMENDED PLAN FOR THE ADJUSTMENT OF DEBTS OF THE CITY OF DETROIT. OBJECTION TO THE REVISED NOTICE OF THE ORDER GRANTING DEBTOR'S TWELFTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (LATE-FILED CLAIMS)

I, Bridget Murriel, object to the City of Detroit (the "City") hereby filing this consolidated reply in support of the Motion of the City of Detroit, Pursuant to Sections 105(a) and 502(c) of the Bankruptcy Code and Bankruptcy Rule 3021, for an Order Approving Reserve Amounts for Certain Disputed or Unliquidated Unsecured Claims in connection with distributions to be made under the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (Docket No. 9351) (the "Motion") capitalized terms not otherwise defined herein have the meanings given to them in the Motion, and respectfully represents as in the Preliminary Statement. I, Bridget Murriel, object to the Preliminary Statement presented as follows:

1. A total of 33 timely and untimely responses or objections to the Motion (collectively, the "Responses") were filed by the parties identified below (collectively, the "Respondents"). A chart summarizing the Responses to the Motion and the City's arguments in reply to




them is attached hereto as Exhibit A and incorporated herein by reference. The City has attempted to communicate with each of the Respondents to the extent that a telephone number was provided in the relevant Response. As a result of contacting Respondents, the City has succeeded in resolving certain of the Responses, as set forth below.

2. In addition, the City received several informal communications regarding the relief requested in the Motion. In connection with two such informal communications, the City agreed to make modifications to (a) the Schedule of Liquidated Amounts and (b) the Schedule of Reclassification Claims, attached to the Motion as Exhibit 6.1 and Exhibit 6.6, respectively, consistent with the Order (A) Expunging Proofs of Claim Nos. 1120, 1136 and 1197 filed by Wilmington Trust, N.A., (B) Reducing Proof of Claim result in a modest increase in the aggregate amount of Liquidated Amounts from \$967,107,874.39 to \$967,997,152.05 but no overall increase in the Disputed Unsecured Claims Reserve because the City previously rounded the aggregate total of Liquidated Amounts to 968,000,000.

I, Bridget Murriel, object to the revised notice that the City, by and through its undersigned counsel, has filed an objection to certain late-filed claims (the "Twelfth 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 TWELFTH OMNIBUS OBJECTION TO FIND YOUR NAME AND CLAIM. Due to a substantial amount of documents to be reviewed pertaining to Case No. 13-53846 are the reason for a delayed response Hon. Thomas J. Tucker. I do not have an attorney to represent me. I submitted documents to the court according to the dates specified in the motion that was filed by the Debtor, City of Detroit, Michigan (the "City"). I, Bridget Murriel, hereby object to the twelfth omnibus objection to object proof of claims dated March 27, 2015 (the "Objection"),² of the Debtor, City of Detroit, Michigan, (the "City"), seeking entry of an order disallowing and expunging certain late-filed claims, 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 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:

I, Bridget Murriel, object to the following items listed below (1-6):

1. The Objection is granted as set forth herein.
2. All of the proofs of claim listed on Exhibit 2 annexed hereto are hereby disallowed and expunged in their entirety, pursuant to section 502(b) of the Bankruptcy Code.
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 claims 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 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.


/bm/Bridget Murriel

**REVISED SCHEDULE OF WHOLLY UNLIQUIDATED LITIGATION
CLAIMS SUBJECT TO TREATMENT IN CLASS 14 UNDER THE PLAN**

Claim Number	Claimant
2259	Armstrong, Alexis
1728	Cannon, Vincent via his attorneys, Gursten, Koltanow, Gursten, Christensen & Raitt, P.C.
2273	Chambere, Theotrice
124	Charler Township of Plymouth
2833	Class Claimants
2994	Darrah, Lucinda J.
3486	Detroit Fire Fighters Association, IAFF Local 344
3493	Detroit Fire Fighters Association, IAFF Local 344
3881	Detroit Fire Fighters Association, IAFF Local 344
1735	Doe, K.S.
866	Fountain Court Consumer Housing Cooperative
2931	Johnson-woods, Linda
2822	Joliet Town Houses Cooperative Association
2490	Jones, Valine B/r/f Jones, Amaz
1831	Kelly, Toyia Personal Rep of Estate of Kevin Ivie
2863	Lafayette Town Houses, Inc.
2825	Lasalle Town Houses Cooperative Association
2264	McCormick, Letha
3426	Miller, Kevin
2708	Moore Jr., David
3428	Moore, Jerome
3798	Murriel, Bridget
3799	Murriel, Bridget
2828	Nicolet Town Houses Cooperative Association
3468	Roseman, Mark and Luzeler
1624	Soto, Daniel
2823	St. James Cooperative
2268	Stevenson, Kenyata
2263	Truelove, Omar
323	Whitaker, Mary
1468	Williams Jr., Ronald

Dated: April 10, 2015

Respectfully submitted,

/s/ Heather Lennox

Heather Lennox (OH 0059649)

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ATTORNEYS FOR THE CITY

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13-53846-tjt Doc 9652 Filed 04/10/15 Entered 04/10/15 13:59:27 Page 17 of 41