

**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. Thomas J. Tucker
Debtor	:	
-----	X	

DEBTOR'S SEVENTEENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS

(Incorrectly Classified Claims)

<p>THIS OBJECTION SEEKS TO RECLASSIFY CERTAIN FILED PROOFS OF CLAIM AS GENERAL UNSECURED CLAIMS. CLAIMANTS RECEIVING THIS OBJECTION SHOULD CAREFULLY REVIEW THIS OBJECTION AND LOCATE THEIR NAMES AND CLAIMS ON THE EXHIBIT ATTACHED TO THIS OBJECTION.</p>
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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 reclassifying certain incorrectly classified claims as general unsecured claims, 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 (Docket 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* (Docket 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* (Docket 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* (Docket No. 5872) (the “Claims Procedures Order”), allowing the City to file an omnibus objection with respect to incorrectly classified claims.

9. Each of the Claims listed on Exhibit 2 are incorrectly classified as administrative claims.

RELIEF REQUESTED

10. The City files this Objection pursuant to the Bar Date Order, Sections 502(b) and 503(b)(9), 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 reclassifying the claims set forth in Exhibit 2 annexed hereto as general unsecured claims or other such unsecured claims as provided for in the Plan (the “Incorrectly Classified Claims”). These Incorrectly Classified Claims were filed as administrative priority claims under Section 503(b). The Incorrectly Classified Claims either (a) do not meet the requirements of Section 503(b) of the Bankruptcy Code, or (b) did not properly assert an administrative priority claim pursuant to the Bar Date Order.

11. Other than seeking reclassification of the Incorrectly Classified Claims as general unsecured claims or other such unsecured claims as provided for in the Plan, this Objection does not address the substance of the Incorrectly Classified Claims. Accordingly, the Objection does not constitute any admission or determination as to any fact concerning any of the Incorrectly Classified Claims, other than the City’s position that such claims do not meet the requirements for administrative priority treatment. The City reserves all of its rights to object, on any basis, to any of the Incorrectly Classified Claims, beyond those bases set forth in this Objection.

¹ Sections 502 and 503 of the Bankruptcy Code are made applicable to Chapter 9 proceedings through Section 901(a) of the Bankruptcy Code.

BASIS FOR RELIEF REQUESTED

12. Section 503(b) allows creditors to file claims seeking administrative expense priority. Claims which meet the requirements of Section 503(b) are entitled to administrative, rather than general unsecured, priority.

13. Under the Bar Date Order, “all administrative claims under section 503(b) of the Bankruptcy Code, other than 503(b)(9) claims and the administrative portion of Rejection Damages Claims, shall not be deemed proper if asserted by proof of claim.” Bar Date Order, ¶ 5.

14. As such, only claims under Section 503(b)(9) and the administrative portion of Rejection Claims are properly asserted as administrative priority claims using a proof of claim form. If the alleged administrative priority claim did not fall under Section 503(b)(9) and was not the administrative portion of a Rejection Claim, then it was required to be filed within 45 days after the Effective Date and, pursuant to the Bar Date Order, “shall not be deemed proper if asserted by proof of claim.” *See* Plan Art. II.A.2(a); Bar Date Order ¶ 5.

15. The City has reviewed the Incorrectly Classified Claims and confirmed that none of the Incorrectly Classified Claims were properly filed as administrative priority claims pursuant to the Bankruptcy Code or the Bar Date Order.

16. Specifically, none of the Incorrectly Classified Claims are Section 503(b)(9) or Rejection Claims, and all were filed by proof of claim, in direct contravention of the Bar Date Order.

17. 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 are incorrectly classified. (Claims Procedures Order at 2.)

18. 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 Incorrectly Classified 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, the relief sought ensures that an important goal of the Bankruptcy Code is met: equal treatment of similarly situated creditors. Only creditors who have validly filed administrative priority claims are entitled to the treatment afforded to those claims. The Incorrectly Classified Claims do not meet the requirements of administrative priority claims and/or did not properly file such administrative priority claims, and thus should not receive such treatment. Accordingly, the City believes that the relief sought by this Objection is in the best interests of the City and its creditors.

19. Based upon the foregoing, the City seeks entry of an order, substantially in the form annexed hereto as Exhibit 1, reclassifying the Incorrectly Classified Claims as general unsecured claims or other such unsecured claims as provided for in the Plan. Accordingly, pursuant to section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007(c), the Court should grant the relief requested.

SEPARATE CONTESTED MATTERS

20. 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

21. 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

22. 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. In light of the nature of the relief requested, the City respectfully submits that no other or further notice of the relief requested in this Objection need be given.

NO PRIOR REQUEST

23. 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: April 23, 2015

FOLEY & LARDNER LLP

By: /s/ John A. Simon
John A. Simon (P61866)
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. Thomas J. Tucker
-----X	:	

**NOTICE OF DEBTOR'S SEVENTEENTH OMNIBUS
OBJECTION TO CERTAIN CLAIMS**

(Incorrectly Classified Claims)

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

PLEASE TAKE NOTICE THAT the City, by and through its undersigned counsel, has filed an objection to certain incorrectly classified claims (the "Seventeenth Omnibus Objection") and for an order reclassifying 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 SEVENTEENTH 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 Seventeenth Omnibus Objection, then on or before **May 20, 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
Leah R. Imbrogno
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 **May 27, 2015** at 1:30 p.m. in Courtroom 1925, 211 W. Fort Street, 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: April 23, 2015

FOLEY & LARDNER LLP

By: /s/ John A. Simon
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*Counsel for the Debtor, City of Detroit,
Michigan*

EXHIBIT 1: PROPOSED ORDER

4824-2250-8835.4

**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. Thomas J. Tucker
Debtor	:	
-----	X	

**ORDER GRANTING DEBTOR'S
SEVENTEENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS
(Incorrectly Classified Claims)**

Upon the seventeenth omnibus objection to claims, dated April 23, 2015 (the “Objection”),² of the Debtor, City of Detroit, Michigan, (the “City”), seeking entry of an order reclassifying certain incorrectly classified claims as general unsecured claims or other such unsecured claims as provided for in the Plan; 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 ORDERED that:

1. The Objection is granted as set forth herein.
2. All of the proofs of claim listed on Exhibit 2 annexed hereto are reclassified as general unsecured claims or other such unsecured claims as provided for in the Plan.
3. None of the proofs of claims listed on Exhibit 2 are entitled to the treatment provided for in Section 503(b) of the Bankruptcy Code.
4. The City's claims agent is hereby authorized to update the claims register to reflect the relief granted in this Order.
5. The City is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.
6. Nothing contained in the Objection or this Order constitutes any admission or determination as to any fact concerning any of the Incorrectly Classified Claims by the City. The City reserves all of its rights to object to any of the Incorrectly Classified Claims on any basis.
7. 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.

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Objection.

8. 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: INCORRECTLY CLASSIFIED CLAIMS TO BE RECLASSIFIED

4824-2250-8835.4

INCORRECTLY CLASSIFIED CLAIMS

Claim No.	Claimant	Claim Amount As Stated On Proof Of Claim	Stated Basis	Classification As Stated On Proof Of Claim	Proper Classification
157	Genre Brogue 2710 W. Chicago Apt. 105 Detroit, MI 48206	Unliquidated	<u>Stated Basis:</u> “Notice(s) of service & filings.”	Admin Priority	General Unsecured
163	Michael James 7501 E. Jefferson Apt. 915 Detroit, MI 48214	Unliquidated	<u>Stated Basis:</u> “Workers compensation.”	Admin Priority	General Unsecured
168	Tanya Billingslea 9212 Coyle St. Detroit, MI 48228	112.00	<u>Stated Basis:</u> None.	Admin Priority	General Unsecured
182	Frederick Rogers 7771 Poe Detroit, MI 48206	700.00	<u>Stated Basis:</u> None.	Admin Priority	General Unsecured
188	Dilip K Patel 24249 Leewin St. Detroit, MI 48219	Unliquidated	<u>Stated Basis:</u> “Pension #203458”	Admin Priority	General Unsecured
220	Edgemere Assoc. LTD M. Richard Mellon 116 Edgemere Way South Naples, FL 34105	47,375.00	<u>Stated Basis:</u> “Bondholder.”	Admin Priority	General Unsecured
235	David B. Morehouse	9,408.50	<u>Stated Basis:</u>	Admin Priority	General Unsecured

	1199 Westcreek Lane Westlake Village, CA 41362		“See statements enclosed [regarding investment account details].”		
284	Ahkeia Mccallum 11401 Prest St. Detroit, MI 48227	112.00	<u>Stated Basis:</u> None.	Admin Priority	General Unsecured
298	234 Larned Associates c/o Myles Hoffert Hoffer & Assoc. 32255 Northwestern Hwy., Suite 290 Farmington Hills, MI 48334	Unliquidated	<u>Stated Basis:</u> “Tax tribunal order of 12/11/12 attached.”	Admin Priority	General Unsecured
304	Keisha Baxter 16624 Tracey St. Detroit, MI 48235	112.00	<u>Stated Basis:</u> “City owes me \$112.00.”	Admin Priority	General Unsecured
306	Craig E James 6432 Butterfly Sky St. North Las Vegas, NV 89084	Unliquidated	<u>Stated Basis:</u> “City of Detroit Retiree.”	Admin Priority	General Unsecured
321	Donna M & Daniel N DAgostino 21 Waterview Dr. Glenmoore, PA 19343	2,000.00	<u>Stated Basis:</u> “general obligation bonds, series B, coupon 570 12/13/05.”	Admin Priority	General Unsecured
324	Charles E. Crow 312 W. Hasting Rd, Apt. 269 Spokane, WA 99218	26,316.08	<u>Stated Basis:</u> “Purchase of bonds 251093H78 on 1/30/13”	Admin Priority	General Unsecured
308	Jack R. Bates 2177 Guernsey Rd Beverton, MI	15,000.00	<u>Stated Basis:</u> “Unsecured GO bond.”	Admin Priority	General Unsecured

	48612				
333	Darren Terhune 16731 Riverview Detroit, MI 48219	10,000.00	<u>Stated Basis:</u> “Overpaid taxes for 2009, 2010, 2011, 2012.”	Admin Priority	General Unsecured
337	Chiquita N. Smith 12881 Rutland Detroit, MI 48227	10,000.00	<u>Stated Basis:</u> “Overpaid taxes for years 2009, 2010, 2011, 2012.”	Admin Priority	General Unsecured
341	M Johnson & Associate LLC Attn Accounts Payable PO Box 1258 Lapeer, MI 48446	5,100.00	<u>Stated Basis:</u> “Nonpayment for case management services.”	Admin Priority	General Unsecured
429	BSI/Accura Loan Services 314 S. Franklin Street PO Box 517 Titusville, PA 16354 And BSI/Accura Loan Services 7668 Warren Pkwy, Suite 325 Frisco, TX 75034	126,000.00	<u>Stated Basis:</u> “Taxes & Mortgage.”	Admin Priority	General Unsecured
519	Priority Patient Transport Attn Accounts Payable PO Box 346 Dearborn Heights, MI 48127	155,054.98	<u>Stated Basis:</u> “Services Performed.”	Admin Priority	General Unsecured
757	Carolyn Watkins 7715 Vaughan Detroit, MI	1,362.17	<u>Stated Basis:</u> None.	Admin Priority	General Unsecured

	48228				
765	John D Geyer / Kathleen M Geyer JT WROS 5910 NE 82nd Ave. Vancouver, WA 98662	Unliquidated	<u>Stated Basis:</u> “Loss of value.”	Admin Priority	General Unsecured
923	Property Owner 15820 Asbury Park Detroit, MI 48235	1,238.61	<u>Stated Basis:</u> “I was overcharged from 2003-2011 my homestead credit.”	Admin Priority	General Unsecured
1353	D A Central Inc Attn Accounts Payable 13155 Cloverdale Oak Park, MI 48237	11,730.93	<u>Stated Basis:</u> “Services & Equipment for Security.”	Admin Priority	General Unsecured
1300	Deborah Traitt 18420 Wildemere Detroit, MI 48221	600.49	<u>Stated Basis:</u> “Unauthorized water bill lien for estimated service.”	Admin Priority	General Unsecured
1860	Deborah Zachary 8833 Mendota Detroit, MI 48204	129,315.00	<u>Stated Basis:</u> “Layoff while on disability – long term benefits stopped.”	Admin Priority	General Unsecured
1879	Phillip A. Sain 11690 Lauder Detroit, MI 48227	9,800.00	<u>Stated Basis:</u> “10% pay reduction of straight time/OT longevity pay.”	Admin Priority	General Unsecured
1927	Andre Marcus Ransom 101 Rhode Island Highland Park, MI 48203	6,975.00	<u>Stated Basis:</u> “Damages to tool box.”	Admin Priority	General Unsecured

2096	Andre R. Canty 31510 John R. Rd. Apt. 109 Madison Heights, MI 48071	Unliquidated	<u>Stated Basis:</u> “Longevity.”	Admin Priority	General Unsecured
2229	Robert Kilgore c/o Brian Muawad 22330 Greater Mack Ave. St. Clair Shores, MI 48080	17,000.00	<u>Stated Basis:</u> “Non-payment of personal injury protection benefits.”	Admin Priority	General Unsecured
2246	Joyce Daniels c/o Brian Muawad 22330 Greater Mack Ave. St. Clair Shores, MI 48080	100,000.00	<u>Stated Basis:</u> “No-fault benefits and third party negligence.”	Admin Priority	General Unsecured
2249	Kimberly Schaffner c/o Brian Muawad 22330 Greater Mack Ave. St. Clair Shores, MI 48080	150,000.00	<u>Stated Basis:</u> “Third party negligence.”	Admin Priority	General Unsecured
2252	Laurence Woody White PO Box 163 Chloe, WV 25235	Unliquidated	<u>Stated Basis:</u> “Employed by and for City of Detroit for twenty-three years and seven months, city engineering; also bldg. & safety engineering.”	Admin Priority	General Unsecured
2296	Jonathan B Fields 16891 Avon Detroit, MI 48219	1,500.00	<u>Stated Basis:</u> “Compensatory and sick time.”	Admin Priority	General Unsecured

2328	Parsons Brinckerhoff Michigan, Inc. Attn: Edwin Tatem Guardian Building 500 Griswold St. Suite 2900 Detroit, MI 48226	Unliquidated	<u>Stated Basis:</u> “Transportation management advisory services and other services set forth on the Documents referenced on the Addendum hereto.”	Admin Priority	General Unsecured
2356	Brian Jordan 20423 Meyers Rd. Detroit, MI 48235	106.95	<u>Stated Basis:</u> “Unsecured claim.”	Admin Priority	General Unsecured
2357	Debra F Guilbeaux 19666 Caldwell Detroit, MI 48234	100,000.00	<u>Stated Basis:</u> “Pension credits, backpay wages, vacation pay, settlement money, arbitration award.”	Admin Priority	General Unsecured
2358	Cynthia McKissack 23603 Sutton Dr. Apt. 1223 Southfield, MI 48033	45,000.00	<u>Stated Basis:</u> “loss wages, longevity, holiday pay, tuition reimbursement, excess premium & copays, healthcare payroll errors, shift premiums.”	Admin Priority	General Unsecured
2359	Carol Jean Finley 8227 Karam Blvd. Unit #1 Warren, MI 48093	59,130.00	<u>Stated Basis:</u> “Service performed, delivers health care, credit card debt & mortgage, interest on pension.”	Admin Priority	General Unsecured
2360	Ricky Brown c/o Adler Stilman 30300	Unliquidated	<u>Stated Basis:</u> “workers’ compensation	Admin Priority	General Unsecured

	Northwestern Hwy, Third Floor Farmington Hills, MI 48334		benefits and personal injury protection claims.”		
2404	Irma Industrious 3051 Lindenwood Drive Dearborn, MI 48120	13,500.00	<u>Stated Basis:</u> “Bonus for employment.”	Admin Priority	General Unsecured
2586	Alim Rashid 14628 Ohio Detroit, MI 48238	2,042.00	<u>Stated Basis:</u> “Unpaid wages due to pay cuts against union contract.”	Admin Priority	General Unsecured
2595	Alim Rashid 14628 Ohio Detroit, MI 48238	980.00	<u>Stated Basis:</u> “COLA and hazard pay.”	Admin Priority	General Unsecured
2729	Dennis M Taubitz 3051 Lindenwood Dr. Dearborn, MI 48120	16,847.20	<u>Stated Basis:</u> “Unpaid wages.”	Admin Priority	General Unsecured
2730	Gretchen R. Smith 3901 Grand River Ave. #913 Detroit, MI 48208	Unliquidated	<u>Stated Basis:</u> “retirement (DPS), property, bus accident, lawsuit for all Detroit Public Schools, appropriate benefits and rights.”	Admin Priority	General Unsecured
2740	Joseph P Fortier 2532 Argentine Road Howell, MI 48855	Unliquidated	<u>Stated Basis:</u> “Worked 16 years as police officer for the City of Detroit.”	Admin Priority	General Unsecured
2852	Association of Prof. Construction	60,000.00	<u>Stated Basis:</u> “Discharge	Admin Priority	General Unsecured

	Inspectors & Cleveland Gregory c/o Scheff Washington & Driver, PC 645 Griswold, Suite 1918 Detroit, MI 48226		without cause under collective bargaining contract.”		
2914	Randolph Skillman c/o Adler Stilman 30300 Northwestern Hwy, Third Floor Farmington Hills, MI 48334	Unliquidated	<u>Stated Basis:</u> “Workers’ compensation benefits and personal injury protection benefits.”	Admin Priority	General Unsecured
2917	James E. Hawthorne c/o Adler Stilman 30300 Northwestern Hwy, Third Floor Farmington Hills, MI 48334	Unliquidated	<u>Stated Basis:</u> “Workers’ compensation benefits.”	Admin Priority	General Unsecured
2920	Robert A. Ross c/o Adler Stilman 30300 Northwestern Hwy, Third Floor Farmington Hills, MI 48334	Unliquidated	<u>Stated Basis:</u> “Workers’ compensation benefits.”	Admin Priority	General Unsecured
2929	Meddie Johnson c/o Adler Stilman 30300	Unliquidated	<u>Stated Basis:</u> “Workers’ compensation	Admin Priority	General Unsecured

	Northwestern Hwy, Third Floor Farmington Hills, MI 48334		benefits.”		
2933	Lucius Reed Ryans c/o Adler Stilman 30300 Northwestern Hwy, Third Floor Farmington Hills, MI 48334	Unliquidated	<u>Stated Basis:</u> “Workers’ compensation benefits.”	Admin Priority	General Unsecured
3064	Jessie B. Clanton, Jr. c/o Allan Studenberg P.C. 4000 Town Center, Suite 1470 Southfield, MI 48075	Unliquidated	<u>Stated Basis:</u> “health care services/workers’ compensation claim.”	Admin Priority	General Unsecured
3248	Sheila Pennington 20469 Steel Detroit, MI 48235	380.00	<u>Stated Basis:</u> “Grievance – wrongfully denied overtime.”	Admin Priority	General Unsecured
3251	Sheila Pennington 20469 Steel Detroit, MI 48235	750.00	<u>Stated Basis:</u> “Longevity (Christmas Bonus.)”	Admin Priority	General Unsecured
3350	Sharon Woodard 12896 Forrer Detroit, MI 48227	Unliquidated	<u>Stated Basis:</u> “Pension/annuity.”	Admin Priority	General Unsecured
2906	Rehabilitation Physicians PC Attn: Accounts Payable Infinity Building 28455 Haggerty	8,679.00	<u>Stated Basis:</u> “Medical providers that treated patients for workman’s comp.	Admin Priority	General Unsecured

	Rd., Ste 200 Novi, MI 48377		injuries.”		
2971	Mid America Evaluation Group Inc. Attn: Accounts Payable 28175 Haggerty Rd. Novi, MI 4877	43,833.00	<u>Stated Basis:</u> “Services performed to assist debtor in mitigating damages in lawsuit & claims.”	Admin Priority	General Unsecured
3649	Michael Gene DePriest II 7700 E. Jefferson Apt. 201 Detroit, MI 48214	52,000.00	<u>Stated Basis:</u> “paycuts, hazardous work environment, COLA, health problems.”	Admin Priority	General Unsecured
3646	Consolidated Rail Corporation John K. Enright, Esq. 1717 Arch Street, 13th Floor Philadelphia, PA 19103	2,295.91	<u>Stated Basis:</u> “Land lease, pipe license and railroad labor charges for work due to property damage caused by City.”	Admin Priority	General Unsecured
3689	Detroit Public Library c/o Stuart Gold, Esq. 24901 Northwestern Hwy, #444 Southfield, MI 48075	Unliquidated	<u>Stated Basis:</u> “Pension and health care obligations.”	Admin Priority	General Unsecured