UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:
City of Detroit, Michigan
Debtor.

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U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN

Bankruptcy Case No. 13-53846
Honorable Thomas J. Tucker
Chapter 9

CLAIMANT MICHAEL MCKAY'S MOTION TO ALLOW FILING OF PAPER COPY

Claimant Michael McKay, by and through his attorneys, Romano Law, PLLC hereby moves this Honorable Court to enter an order allowing him to file his Notice of Appeal by paper copy, and in support thereof states:

1. Counsel for Michael McKay is not registered with the U.S. Bankruptcy Court Eastern District e-filing system, as counsel does not practice in this Court.
2. It is expected that the filing of the Notice of Appeal will be a one-time filing.
3. After previously filing the Motion to Enforce Agreement Regarding Claim of Michael McKay, Claimant's Counsel was unable to complete this e-filing training and Claimant did not foresee the necessity of filing this Notice of Appeal.
4. Further, the process for which to become eligible for e-filing is somewhat extended. Counsel for McKay is certainly willing and able to go through that process, and will endeavor to have the training completed by the time the Designation and Statement of Record comes due.

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LAW OFFICES
ROMANO LAW, PLLC
23880 Woodward Avenue • Pleasant Ridge, Michigan 48069 • (248) 750-0270

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E.D. MICHIGAN-DETROIT

WHEREFORE, Counsel for Michael McKay respectfully requests that this Honorable Court enter an order allowing filing of the subject motion by paper copy.

ROMANO LAW, PLLC

/s/ Stanley Okoli

By: Stanley Okoli (P73722)
Eric Stempien (P58703)
Attorneys for Michael McKay

Dated: June 24, 2016

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23880 Woodward Avenue • Pleasant Ridge, Michigan 48069 • (248) 750-0270