

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

**IN THE MATTER OF:**

CITY OF DETROIT, MICHIGAN

DEBTOR

CAE NO: 13-53846.

CHAPTER 9

HON: THOMAS J. TUCKER

**CERTIFICATION OF NO RESPONSE TO CITY OF DETROIT WATER AND  
SEWERAGE DEPARTMENT'S OBJECTIONS TO CLAIM 3125 FILED BY THE  
ASSOCIATION OF MUNICIPAL ENGINEERS, CLAIM 3206 FILED BY THE  
ASSOCIATION OF DETROIT ENGINEERS AND CLAIM 2425 FILED BY THE  
SANITARY CHEMISTS AND TECHNICIANS ASSOCIATION**

**NOW COMES** the City of Detroit Water and Sewerage Department ("DWSD")  
by and through its counsel, KILPATRICK & ASSOCIATES, P.C., and hereby states as follows:

1. On September 12, 2016, Kilpatrick & Associates, P.C. filed the City of Detroit Water and Sewerage Department's Objections to Claim 3125 Filed by the Association of Municipal Engineers, Claim 3206 Filed by the Association of Detroit Engineers and Claim 2425 Filed by the Sanitary Chemists and Technicians Association, Proposed Order, Notice and Proof of Service with the Court and an employee of Kilpatrick & Associates, P.C. served copies of the Motion and Attachments, and the Notice of Requirement for Response on the City of Detroit Water and Sewerage Department's Objections to Claim 3125 Filed by the Association of Municipal Engineers, Claim 3206 Filed by the Association of Detroit Engineers and Claim 2425 Filed by the Sanitary Chemists and Technicians Association, the Office of the U.S. Trustee and served copies of the Notice only to all interested parties listed on the creditor's mailing matrix pursuant to L.B.R. 4001-1(a) (E.D.M.).

2. As of this date, no Objection or request for Hearing has been filed regarding the City of Detroit Water and Sewerage Department's Objections to Claim 3125 Filed by the Association of Municipal Engineers, Claim 3206 Filed by the Association of Detroit Engineers and Claim 2425 Filed by the Sanitary Chemists and Technicians Association.



3. More than twenty-one (21) days have passed since the service of said Motion and Notice of Motion.

**WHEREFORE**, the City of Detroit Water and Sewerage Department, prays this Court grant the relief requested in the City of Detroit Water and Sewerage Department's Objections to Claim 3125 Filed by the Association of Municipal Engineers, Claim 3206 Filed by the Association of Detroit Engineers and Claim 2425 Filed by the Sanitary Chemists and Technicians Association.

Respectfully submitted;

KILPATRICK & ASSOCIATES, P.C.

By: /s/ Richardo I. Kilpatrick  
RICHARDO I. KILPATRICK, ESQ. (P35275)  
Attorneys for City of Detroit Water and Sewerage Department  
903 North Opdyke Road, Suite C  
Auburn Hills, Michigan 48326  
(248) 377-0700  
ecf@kaalaw.com

Dated: October , 2016 13, 2016

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT**

In re:

Chapter 9

CITY OF DETROIT, MICHIGAN

Hon. Thomas J. Tucker

Debtor.

Case No. 13-53846

**ORDER DISALLOWING CLAIM 3125 FILED BY THE ASSOCIATION OF  
MUNICIPAL ENGINEERS, CLAIM 3206 FILED BY THE ASSOCIATION  
OF DETROIT ENGINEERS AND CLAIM 2425 FILED BY THE  
SANITARY CHEMISTS AND TECHNICIANS ASSOCIATION**

This matter having come before the Court on the Objection of Detroit Water and Sewerage Department to Claim Number 3125 filed by the Association of Municipal Engineers, Claim Number 3206 filed by the Association of Detroit Engineers and Claim Number 2425 filed by the Sanitary Chemists and Technicians Association, due notice having been provided and the Court being otherwise fully advised in the premises;

**IT IS HEREBY ORDERED** that Claim Number 3125 together with related Unfair Labor Practice Charges that should have been included in the Claim filed by the Association of Municipal Engineers, Claim Number 3206 filed by the Association of Detroit Engineers and Claim Number 2425 filed by the Sanitary Chemists and Technicians Association are disallowed.

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN THE MATTER OF:**

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Hon. Thomas J. Tucker

Case No. 13-53846

**PROOF OF SERVICE**

**Karen O’Nail** states that on this 13<sup>th</sup> day of October 2016 she served a copy of the CERTIFICATE OF NO RESPONSE TO DETROIT WATER AND SEWERAGE DEPARTMENT’S OBJECTIONS TO CLAIM 3125 FILED BY THE ASSOCIATION OF MUNICIPAL ENGINEERS, CLAIM 3206 FILED BY THE ASSOCIATION OF DETROIT ENGINEERS AND CLAIM 2425 FILED BY THE SANITARY CHEMISTS AND TECHNICIANS ASSOCIATION, PROPOSED ORDER and this PROOF OF SERVICE upon the following parties with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Richardo I. Kilpatrick                      ecf@kaalaw.com

Office of the U.S. Trustee                via ecf email

And by depositing same in a United States postal box located in Detroit, Michigan, with the lawful amount of postage affixed thereto and addressed to:

Association of Municipal Engineers	John Runyan
Detroit Water & Sewerage Department,	Sachs, Waldman, P.C.
New Administration Building, Room 420	2211 East Jefferson, Suite 200
9300 West Jefferson	Detroit, Michigan 48207
Detroit, Michigan 48209	
Attn: Partho Ghosh	

Sanitary Chemists and Technicians Association  
Attn: Saulius Simoliunas  
P.O. Box 530353  
Livonia, Michigan 48153

Association of Detroit Engineers  
Attn: Sanjay Patel  
P.O. Box 2241  
Detroit, Michigan 48321

/s/Karen O'Nail

**Karen O'Nail**, an employee of  
**KILPATRICK & ASSOCIATES, P.C.**

Attorneys for Detroit Water and Sewerage Department  
615 Griswold, Suite 1305  
Detroit, Michigan 48226  
(313) 963-2581  
ecf@kaalaw.com