

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

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**CITY OF DETROIT’S MOTION FOR AN ORDER (I) DETERMINING
THAT JAMIE SIMPSON IS IN VIOLATION OF THE PLAN OF
ADJUSTMENT AND THE ORDER EXPUNGING HER CLAIM, AND
(II) REQUIRING DISMISSAL OF HER STATE COURT LAWSUIT**

The City of Detroit, Michigan (“City”), by its undersigned counsel, files its *City of Detroit’s Motion for an Order (I) Determining That Jamie Simpson Is in Violation of the Plan of Adjustment and the Order Expunging Her Claim, and (II) Requiring Dismissal of Her State Court Lawsuit* (“Motion”). In support, the City respectfully states as follows:

I. Introduction

Jamie Simpson (“Plaintiff”) filed a proof of claim alleging injuries sustained in a prepetition bus accident. The City’s records showed her claim had been satisfied, so the City objected and moved to have the claim expunged. There was no response and the Court ordered the claim expunged. Unfazed, in December of 2015, Plaintiff sued the City in state court for the satisfied claim (and more), plus attorneys’ fees and statutory interest, both of which are expressly barred by the City’s confirmed Plan. The City reminded Plaintiff that her claim had been



discharged and expunged, but to no effect—the state court case continues. Consequently, the City requests that this Court enter an order requiring the dismissal of the state court case.

II. Background

A. Key points from the City’s Bankruptcy Case.

On July 18, 2013 (“Petition Date”), the City commenced this chapter 9 case (“Bankruptcy Case”). After a number of iterations, the City filed its *Eighth Amended Plan of the Adjustment of Debts of the City of Detroit (October 22, 2014)* (“Plan,” Doc. No. 8045). The Court entered an order confirming the City’s Plan (“Confirmation Order,” Doc. No. 8272) and on December 10, 2014 (“Effective Date”), the Plan became effective. (Doc. No. 8649.)

The Plan provides for the treatment of first party motor vehicle claims arising under M.C.L. §§ 500.3107 and 500.3108, such as the one that Plaintiff allegedly had. Plan, Art. IV.S., pp. 63-64. Such claims are not entitled to pre or post-petition interest or attorneys’ fees. *Id.*; *In re City of Detroit, Mich.*, 548 B.R. 748, 757-58 (Bankr. E.D. Mich. 2016).

Regarding claims in general, the Plan discharge provision states

Except as provided in the Plan or in the Confirmation Order, the rights afforded under the Plan and the treatment of Claims under the Plan will be in exchange for and in complete satisfaction, discharge and release of all Claims arising on or before the Effective Date [. . .]
Except as provided in the Plan or in the Confirmation

Order, Confirmation will, as of the Effective Date, discharge the City from all Claims or other debts that arose on or before the Effective Date, and all debts of the kind specified in section 502(g), 502(h) or 502(i) of the Bankruptcy Code [. . .]

(“Plan Discharge,” Plan, Art. III.D.4, p. 50). Further, Plan Article III.D.5 states

Injunction.

On the Effective Date, except as otherwise provided herein or in the Confirmation Order,

- a. all Entities that have been, are or may be holders of Claims against the City [. . .] shall be permanently enjoined from taking any of the following actions against or affecting the City or its property [. . .]**
 - 1. commencing, conducting or continuing in any manner, directly or indirectly, any suit, action or other proceeding of any kind against or affect the City or its property [. . .]**
 - 5. proceeding in any manner in any place whatsoever that does not conform or comply with the provisions of the Plan [. . .]**

(“Plan Injunction,” Plan, Article III.D.5, p. 51) (emphasis in original).¹

¹ Not only does the Plan enjoin parties from suing the City over discharged debts, so does the Bankruptcy Code. 11 U.S.C. § 944 (discharging the City from all debts as of confirmation, excepting those carved out by the Plan or Confirmation Order or where a party lacked notice of the case); 11 U.S.C. § 901 (incorporating 11 U.S.C. § 524(a)(1) and (2) into chapter 9); 11 U.S.C. § 524(a)(2) (enjoining parties from suing the City for discharged debts); *In re City of Cent. Falls, R.I.*, No. 11-13105, 2015 WL 12991580 at *12 (Bankr. D.R.I. Nov. 13, 2015); *In re City of Detroit, Mich.*, 548 B.R. 748, 751 (Bankr. E.D. Mich. 2016).

The Court retained jurisdiction to enforce the Plan Injunction and to resolve any suits that may arise in connection with the consummation, interpretation or enforcement of the Plan. Plan, Art. VII. F, G, I, pp. 69-70.

B. Plaintiff files her claim and it is subsequently expunged.

Plaintiff alleged that on January 3, 2013, she was a passenger on a City bus which was involved in an accident and, as a result, she sustained injuries. On February 20, 2014, Plaintiff filed claim number 1815, asserting an unsecured claim for \$20,120 (the “Proof Claim,” attached as **Exhibit 6A**) which consisted of \$15,960 in chiropractic claims and \$4,160 in household services. The Claim provided that notices to Plaintiff should be sent to David J. Jarrett, PC, 12820 Ford Rd. Suite 1, Dearborn, MI 48381 (the “Service Address”). On December 16, 2014, the City served its *Notice of (I) Entry of Order Confirming Eighth Amended Plan for the Adjustment of Debts of the City of Detroit and (II) Occurrence of Effective Date* (“Notice,” Doc. No. 8649) on Plaintiff at the Service Address by first class mail. (Excerpt from certificate of service, Doc. No. 8970, “Service of Notice,” attached as **Exhibit 6B**.) The Notice provided Plaintiff with express notice of the Plan Discharge.

On February 13, 2015, the City filed the *Debtor’s Eighth Omnibus Objection to Certain Claims (Satisfied Claims)* (“Objection,” Doc. No. 9260). The Objection listed the Claim among those paid in full or otherwise satisfied. Objection, Exhibit

2 (“Satisfied Claims”), top of second page (identifying the Claim). The City served Plaintiff with the Objection at her Service Address by first class mail.² Plaintiff did not timely respond. (Doc. No. 9633, Certificate of No Response.) Thus, on April 10, 2015, the Court entered the *Order Sustaining Debtor’s Eighth Omnibus Objection to Certain Claims (Satisfied Claims)* (“Order,” Doc. No. 9651). Paragraph 2 of the Order states “All of the proofs of claim listed in the ‘Satisfied Claims’ column in Exhibit 2 annexed to the Objection (the ‘Satisfied Claims’) are disallowed and expunged in their entirety, under Section 502(b) of the Bankruptcy Code.” The Order was served on the Plaintiff at her Service Address.³

Because Plaintiff’s Claim appears on that exhibit, the Order expunged it.

C. Plaintiff files her State Court Lawsuit.

On December 17, 2015, Plaintiff filed a complaint (“Complaint,” attached as **Exhibit 6C**) against the City in the Circuit Court for the County of Wayne, Michigan (“State Court”), commencing case number 15-016432-NF (“State Court Lawsuit”). Plaintiff alleged that in January of 2013, she rode a City bus, the bus was involved in an accident, and she suffered injuries. Complaint ¶¶ 6-8, 12.

On April 12, 2017, the City sent copies of the Objection and the Order to Plaintiff’s counsel and asked Plaintiff to dismiss her State Court Lawsuit. Letter to Plaintiff, attached as **Exhibit 6D**. There was no response.

² Doc. No. 9281, Certificate of Service, Ex. C, showing service on Plaintiff.

³ Doc. No. 9692, Certificate of Service, Ex. E, showing service on Plaintiff.

On May 9, 2017, Plaintiff filed *Plaintiff's Case Evaluation Summary* (“Evaluation Summary,” attached as **Exhibit 6E**) with the State Court. The Evaluation Summary asserts that the City still owes the amounts asserted in the Proof of Claim and disallowed by the Order plus (a) \$1,500 in further “Misc. Medical Expenses”; (b) \$17,680 in additional undocumented household services; (c) \$9,432 in penalties and statutory interest and (d) \$16,244 in attorneys’ fees. Evaluation Summary, p. 3.

III. Argument

A. The State Court Lawsuit violates the Plan Injunction and is void *ab initio*.

Confirmation of the Plan and occurrence of the Effective Date made the City’s Plan—including the Plan Injunction—binding on all creditors. 11 U.S.C. § 944(a). The Plan Injunction expressly forbade Plaintiff from “commencing [. . . .] any suit, action or other proceeding of any kind against or affect the City or its property” or from “proceeding in any manner in any place whatsoever that does not conform or comply with the provisions of the Plan.” Plan Injunction. Notwithstanding these provisions and the City’s attempts to explain them to Plaintiff, Plaintiff filed and continues forward with her State Court Lawsuit.

State court lawsuits brought by creditors in pursuit of claims that have been discharged in bankruptcy are void *ab initio* and of no effect. *Hamilton v. Herr (In re Hamilton)*, 540 F.3d 367, 373-75 (6th Cir. 2008) (“[I]f a creditor brings a

collection suit after discharge, and obtains a judgment against the debtor, the judgment is rendered null and void by section 524(a). The purpose of the provision is to make it absolutely unnecessary for the debtor to do anything at all in the collection action.”) (quoting COLLIER ON BANKRUPTCY ¶ 524.LH[1] at 524-61). That said, were the City to stand idly by, it could incur significant legal costs as it later unwound the actions Plaintiff had taken in the State Court Lawsuit. Consequently, the City requests that this Court enter an order requiring Plaintiff to dismiss, or cause to be dismissed, her State Court Lawsuit with prejudice.

B. Not only is Plaintiff barred from suing the City, she no longer holds any claim arising from the bus accident upon which she could base a lawsuit against the City.

Because the accident that led to Plaintiff’s claim against the City occurred six months prior to the Petition Date, Plaintiff held a pre-petition claim as of the Petition Date under the “fair contemplation” test adopted by this Court in this case. *City of Detroit*, 548 B.R. at 763-65. In other words, both her pre- and post-petition treatment costs for her pre-petition injury gave rise to a pre-petition claim. *Id.* Indeed, the Proof of Claim acknowledges this, including both pre- and post-petition costs. *See* Proof of Claim, final page (showing care provided post-petition). As previously noted, the claims asserted in the Proof of Claim were disallowed and expunged by the Order. Order, ¶ 2. Consequently, Plaintiff no longer has any claims against the City arising from the bus accident. There simply

is no claim upon which Plaintiff could base a lawsuit, even if she were not barred by the Plan Injunction from doing so.

Article IV, section S of the Plan (“Motor Vehicle Plan Provision”) does not alter that outcome. Plan, Art. V.S, pp. 62-63. The Court recently held that claimants with motor vehicle claims are still required to file a proof of claim. *See* Excerpt from Transcript of March 22, 2017, Hearing (“Transcript,” attached as **Exhibit 6G**), 58:3-8 (“[T]he motor vehicle plan provision of the confirmed plan does not entitle these creditors to any relief or give them any right to pursue any claims against the city such as the claims they are pursuing or have been pursuing in their State Court lawsuits.”). Rather, such claimants are required to file a proof of claim, such as the Claim asserted by Plaintiff. The Plan preserved the City’s right to object to any motor vehicle claim, and the City did, in fact, object to the Claim. Transcript, 55:19-24 (noting the City’s right to object to the Claim); Objection. The Objection was sustained, and the Order expunging and disallowing the the Claim was entered. As a result, Plaintiff does not have a “valid prepetition Claim.” Thus, Article IV, section S of the Plan did not preserve Plaintiff’s right to sue the City, and she has, in fact, no remaining claim to pursue against the City.

IV. Conclusion

For the reasons set forth above, the City respectfully requests that the Court grant the Motion. The City sought, but did not obtain, concurrence to the relief sought in the Motion.

June 16, 2017

Respectfully submitted,

By: /s/ Marc N. Swanson

Jonathan S. Green (P33140)

Marc N. Swanson (P71149)

Ronald A. Spinner (P73198)

MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.

150 West Jefferson, Suite 2500

Detroit, Michigan 48226

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ATTORNEYS FOR THE CITY OF DETROIT

EXHIBIT LIST

Exhibit 1 Proposed Order

Exhibit 2 Notice

Exhibit 3 None

Exhibit 4 Certificate of Service

Exhibit 5 None

Exhibit 6A Claim

Exhibit 6B Service of Notice of Effective Date

Exhibit 6C Complaint

Exhibit 6D Letter to Plaintiff

Exhibit 6E Case Evaluation Summary

Exhibit 6F Excerpt from Transcript of Hearing on March 22, 2017

EXHIBIT 1 – PROPOSED ORDER

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

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**[PROPOSED] ORDER CITY OF DETROIT’S MOTION FOR AN ORDER
(I) DETERMINING THAT JAMIE SIMPSON IS IN VIOLATION OF THE
PLAN OF ADJUSTMENT AND THE ORDER EXPUNGING HER CLAIM,
AND (II) REQUIRING DISMISSAL OF HER STATE COURT LAWSUIT**

This matter, having come before the court on the *City of Detroit’s Motion for an Order (I) Determining That Jamie Simpson Is in Violation of the Plan of Adjustment and the Order Expunging Her Claim, and (II) Requiring Dismissal of Her State Court Lawsuit* (“Motion”), upon proper notice and a hearing, the Court being fully advised in the premises, and there being good cause to grant the relief requested,

THE COURT ORDERS THAT:

1. The Motion is granted.
2. Within five days of the entry of this Order, Jamie Simpson shall dismiss, or cause to be dismissed, with prejudice the City of Detroit from Case No. 15-016462-NF filed in the Circuit Court for the County of Wayne, Michigan (“State Court Lawsuit”).

3. Jamie Simpson is permanently barred, estopped, and enjoined from asserting any claims described in the State Court Lawsuit against the City of Detroit or property of the City of Detroit, in the State Court Lawsuit or in any other action or proceeding.

4. The Court retains jurisdiction over any and all matters arising from the interpretation or implementation of this Order.

EXHIBIT 2 – NOTICE

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

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**NOTICE OF OPPORTUNITY TO RESPOND TO CITY OF DETROIT’S
MOTION FOR AN ORDER (I) DETERMINING THAT JAMIE SIMPSON
IS IN VIOLATION OF THE PLAN OF ADJUSTMENT AND THE ORDER
EXPUNGING HER CLAIM, AND (II) REQUIRING DISMISSAL OF HER
STATE COURT LAWSUIT**

The City has filed its *City of Detroit’s Motion for an Order (I) Determining That Jamie Simpson Is in Violation of the Plan of Adjustment and the Order Expunging Her Claim, and (II) Requiring Dismissal of Her State Court Lawsuit* (the “Motion”). **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney. If you do not want the Court to enter an Order granting the Motion within 14 days you or your attorney must:

1. File with the court a written response or an answer explaining your position at:¹

United States Bankruptcy Court
211 W. Fort St., Suite 1900
Detroit, Michigan 48226

¹ Response or answer must comply with F. R. Civ. P. 8(b), (c) and (e).

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. You must also mail a copy to:

Miller, Canfield, Paddock & Stone, PLC
Attn: Marc N. Swanson
150 West Jefferson, Suite 2500
Detroit, Michigan 48226

2. If a response or answer is timely filed and served, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time, and location of that hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

By: /s/ Marc N. Swanson
Marc N. Swanson (P71149)
150 West Jefferson, Suite 2500
Detroit, Michigan 48226
Telephone: (313) 496-7591
Facsimile: (313) 496-8451
swansonm@millercanfield.com

Dated: June 16, 2017

EXHIBIT 3 – NONE

EXHIBIT 4 – CERTIFICATE OF SERVICE

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

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

CERTIFICATE OF SERVICE

The undersigned certifies that on June 16, 2017, the *City of Detroit's Motion for an Order (I) Determining That Jamie Simpson Is in Violation of the Plan of Adjustment and the Order Expunging Her Claim, and (II) Requiring Dismissal of Her State Court Lawsuit* was filed and served via the Court's electronic case filing and notice system and served upon the individuals listed below via first class mail:

Jamie Simpson
c/o David J. Jarrett
David J. Jarrett, P.C.
12820 Ford. Rd., Suite 1
Dearborn, MI 48381

L. Louie Andreopoulos
David T. Hill
Andreopoulos & Hill, PLLC
Attorneys for Plaintiff
28900 Woodward Avenue
Royal Oak, MI 48067

DATED: June 16, 2017

By: /s/ Marc N. Swanson

Marc N. Swanson
150 West Jefferson, Suite 2500
Detroit, Michigan 48226
Telephone: (313) 496-7591
Facsimile: (313) 496-8451
swansonm@millercanfield.com

EXHIBIT 5 – NONE

Exhibit 6A – Claim

UNITED STATES BANKRUPTCY COURT		EASTERN DISTRICT of MICHIGAN		CHAPTER 9 PROOF OF CLAIM	
Name of Debtor: City of Detroit, Michigan			Case Number: 13-53846		
NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing.					
Name of Creditor (the person or other entity to whom the debtor owes money or property): Jamie Simpson				<div style="font-size: 2em; font-weight: bold; margin-bottom: 10px;">FILED</div> <div style="font-size: 1.2em; font-weight: bold; margin-bottom: 10px;">FEB 20 2014</div> <div style="font-size: 0.8em; font-weight: bold; margin-bottom: 10px;">COURT USE ONLY</div> <div style="font-size: 0.8em;"> <input type="checkbox"/> Check this box if this claim amends a previously filed claim. US Bankruptcy Court MI Eastern District Court Claim Number: _____ (If known) </div> <div style="font-size: 0.8em;">Filed on: _____</div> <div style="font-size: 0.8em;"> <input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving particulars. </div>	
Name and address where notices should be sent: David J. Jarrett, PC 12820 Ford Rd. Suite 1 Dearborn, MI 48381					
Telephone number: 313-943-3113 email: jarrett dav@aol.com					
Name and address where payment should be sent (if different from above):					
Telephone number: _____ email: _____					
1. Amount of Claim as of Date Case Filed: \$ <u>20,120.00</u> If all or part of the claim is secured, complete item 4. If all or part of the claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.					
2. Basis for Claim: <u>Personal Injury - PIP Claim # A32950-002763</u> (See instruction #2)					
3. Last four digits of any number by which creditor identifies debtor: <u>2206</u>			3a. Debtor may have scheduled account as: _____ (See instruction #3a)		
4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: _____ Value of Property: \$ _____ Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed or <input type="checkbox"/> Variable			Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____		
5. Amount of Claim Entitled to Priority as an Administrative Expense under 11 U.S.C. §§ 503(b)(9) and 507(a)(2). \$ _____					
5b. Amount of Claim Otherwise Entitled to Priority. Specify Applicable Section of 11 U.S.C. § _____. \$ _____					
6. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)					
7. Documents: Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consus statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and redacted cop: evidence of perfection of a security interest are attached. (See instruction #7, and the definition of "redacted".) DO NOT SEND ORIGINAL ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain: _____					
8. Signature: (See instruction # 8) Check the appropriate box. <input type="checkbox"/> I am the creditor. <input checked="" type="checkbox"/> I am the creditor's authorized agent. <input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. <input type="checkbox"/> I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.) (See Bankruptcy Rule 3004.) I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.					
Print Name: <u>David J. Jarrett</u> Title: <u>Attorney</u> Company: <u>David J. Jarrett, P.C.</u> Address and telephone number (if different from notice address above): _____ _____ Telephone number: _____ email: _____			<div style="font-size: 1.5em; font-family: cursive; margin-bottom: 10px;">[Signature]</div> <div style="display: flex; justify-content: space-between;"> (Signature) <u>2/18/14</u> (Date) </div>		

RECEIVED

FEB 24 2014

KURTZMAN CARSON CONSULTANTS

**Law Offices Of
David J. Jarrett P.C.**

Professional Corporation

12820 Ford Rd., Suite 1, Dearborn, Michigan 48126

Office: (313) 943-3113

Fax: (313) 582-0050

February 18, 2014


UNITED STATES BANKRUPTCY COURT

Re: Case: In re City of Detroit
Case No.: 13-53846
Creditor: Jamie Simpson
City Claim: A32950-002763-07

PROOF OF CLAIM

• MEDICAL BILLS	\$15,960.00
• HOUSEHOLD SERVICES	\$ 4,160.00
TOTAL:	\$20,120.00

Sincerely,



David J. Jarrett

*Law Offices
Of
David J. Jarrett P.C.
Professional Corporation*

12820 Ford Rd., Suite 1, Dearborn, Michigan 48126

Office: (313) 943-3113

Fax: (313) 582-0050

January 21, 2013

City of Detroit Law Department
2 Woodward Ave., Suite 500
Detroit, MI 48226
Attn: New Claims

Re:	My Client:	Jamie Simpson
	Date of Loss:	01/03/2013
	Location:	Dexter Bus Line, on Cass at or near the intersection of I-75 Service Drive

Dear Sir/Madam

Please be advised that this firm represents **Jamie Simpson** relative to injuries she sustained as a passenger in a City Bus accident on January 3, 2013. The accident took place on the Dexter Bus, on Cass Ave., at or near the intersection of the I-75 Service Drive. It is our intention to file a third party claim as well. Please assign these claims to an adjuster as soon as possible.

We are hereby making a demand for the City of Detroit to pay any and all first party benefits entitled to my client under Michigan Law. It is also our intention to file a claim for all applicable third party benefits pursuant to the provisions of the insured's automobile policy. If the policy provides for arbitration of any of the above referenced claims, please consider this our formal demand for arbitration of same.

Furthermore, this letter shall serve as official notice that this office will hold strictly to the requirements of MCL 500.3142 (3).

Please be advised that pursuant to MCL 500.3112, David J. Jarrett, P.C., hereby exercises the right to claim a lien on all benefits payable to the above clients, and in accordance with the aforementioned statute, the City of Detroit is directed to issue any and all drafts directly to this office. (except direct **undisputed** medical providers)

Please forward an Application for Benefits as soon as possible. Thanking you in advance for your anticipated cooperation.

Very truly yours,


DAVID J. JARRETT, P.C.



CITY OF DETROIT
LAW DEPARTMENT

COLEMAN A. YOUNG MUNICIPAL CENTER
2 WOODWARD AVENUE, SUITE 500
DETROIT, MICHIGAN 48226-3535
PHONE 313•224•4550
FAX 313•224•5505
WWW.DETROITMI.GOV

February 28, 2013

David Jarrett, Atty.
12820 Ford Rd., Suite 1
Dearborn, Michigan 48126

RE: CLAIMANT: Jamie Simpson
CLAIM NUMBER: A32950-002763-07
DATE OF INCIDENT: 1/3/2013

Dear Mr. Jarrett:

Please be advised that the above-mentioned claim has been assigned to me for disposition. Upon review of your file it was found that the City of Detroit has attempted to process your claim, but due to lack of sufficient information, we are unable to proceed. The City of Detroit Law Department Claims Division requires that all claims contain specific information for adequate processing. To assist me in my investigation of this incident, please provide the following items, these items **MUST** be included to ensure further processing of this claim:

- Medicare & No Fault Affidavit (completely filled out and notarized)
- Health & Wage Authorization (completely filled out and notarized)
- PIP Application (completely filled out)

Please be advised that the City of Detroit only reimburses transportation costs at solely \$5.00 dollars per round trip plus \$1.60 per mile. Please be further advised that any other fees related to the issue of transportation for the claimant are not reimbursed by the City of Detroit. If the claimant is a catastrophic case, please immediately notify this office in writing, before services are rendered to the claimant.

Please refer to the File Number which appears in the upper right corner of this letter in future communications or inquiries about this claim.

Should you have any inquiries or concerns, please do not hesitate to contact the undersigned either in writing at the address above or by emailing me at the email cited below.

Respectfully,

Monique' Tyler
Legal Investigator
Tylerm@detroitmi.gov

MT/ss

CITY OF DETROIT
DEPARTMENT OF TRANSPORTATION
TRANSPORTATION OPERATIONS DIVISION
SERVICE INSPECTOR ACCIDENT REPORT

Page 1 of 1


Operator Name Jones Eric			Badge 3143	Sex <input checked="" type="checkbox"/> M <input type="checkbox"/> F	Terminal Gilb Thurs	Day 01-03-13	Date 12:45	Time
Coach 4187	Run 19	Line 16	Location Cass Avenue and Antoinette					
WEATHER		LIGHT CONDITIONS		ROAD SURFACE		TOTAL LANCES		DIRECTION OF COACH
<input type="checkbox"/> Clear <input checked="" type="checkbox"/> Cloudy <input type="checkbox"/> Rain <input type="checkbox"/> Snow <input type="checkbox"/> Fog		<input checked="" type="checkbox"/> Day <input type="checkbox"/> Night <input type="checkbox"/> Dusk/Dawn <input type="checkbox"/> Street Lights <input type="checkbox"/> Other		<input type="checkbox"/> Dry <input type="checkbox"/> Wet <input checked="" type="checkbox"/> Snow <input checked="" type="checkbox"/> Icy <input type="checkbox"/> Other		2		<input type="checkbox"/> North <input checked="" type="checkbox"/> South <input type="checkbox"/> East <input type="checkbox"/> West
								DIRECTION OF AUTO <input type="checkbox"/> North <input type="checkbox"/> East <input checked="" type="checkbox"/> South <input type="checkbox"/> West
				TYPE OF ACCIDENT		OPERATOR PULLED		
				<input type="checkbox"/> Boarding <input type="checkbox"/> Alighting <input checked="" type="checkbox"/> Collision		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No CLINIC <input checked="" type="checkbox"/> yes <input type="checkbox"/> No		
Vehicle #1			Driver License		State	Date of Birth		Phone
					Mich			(Not) Given
Driver Name			Address		City	State	Zip	
John Ross Campbell					Springfield	MI	49237	
Owner of Car			Address		City	State	Zip	
same as above								
License Plate		Year	Make and Model		Insurance Company / Policy #			
6A 6762		07	Ford Taurus		Not available			
Vehicle #2			Driver License		State	Date of Birth		Phone
Driver Name			Address		City	State	Zip	
Owner of Car			Address		City	State	Zip	
License Plate		Year	Make and Model		Insurance Company / Policy #			
Vehicle #3			Driver License		State	Date of Birth		Phone
Driver Name			Address		City	State	Zip	
Owner of Car			Address		City	State	Zip	
License Plate		Year	Make and Model		Insurance Company / Policy #			
# Pass Auto(s)		# Pass Coach		# Pass Injured Auto(s)		# Pass Injured Coach		# Pictures Taken
2		25		0		1		6
Blue Card Signed?								
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
Police on Scene: Badge No.		Unit No.	Police Report #		EMS No.	Hospital		Total Injured Conveyed
M Singer-483		13-2	253859		8			1
Witness Information (use back if necessary)								Number of Witnesses
								0
Name		Address		City	State	Phone #		
Name		Address		City	State	Phone #		
Name		Address		City	State	Phone #		
Name		Address		City	State	Phone #		
Injury Information (use back if necessary)								
Name		Address		City	State	Phone #	Alleged Injury	
Kristen Edward				Dearborn	MI		Right side / knee	
Name		Address		City	State	Phone #	Alleged Injury	
Name		Address		City	State	Phone #	Alleged Injury	
Name		Address		City	State	Phone #	Alleged Injury	

(over)

William R. Ryan
 Senior Service Inspector

Accident Description and Remarks:

Upon my investigation @ 12:45p involving TEO Jones - Badge 3643 License no. J520-234 135-837 working Dexter, the Operator stated while standing at the traffic light in the curb lane southbound on Cass @ Antoinette with twenty-five passengers on board, vehicle #1, a 2009 Ford Taurus driven by a Mr John R. Campbell, who resides at [REDACTED] in Springfield, IL, with two passengers in the car, was standing in the left turn lane Southbound on Cass @ Antoinette, when the light changed Mr John Campbell made a right turn into the coach (attempting to continue southbound on Cass). No reported injuries from the passengers traveling with vehicle #1. A Ms Kristen Edwards on board the Coach seated in the rear (by a pole) DOB [REDACTED] reported that she fell into the pole causing pain to her right side and knee. Medic 8 responded and transported the 19 year old injured passenger to [REDACTED] Detroit Central Unit 13-2 covered the accident - see report 253859. Cleared @ 1:47p the Coach was pulled-in by a Mechanic and TEO Jones was pulled for collection and conveyed to Conentra by Sector 9.

Time Notified	12:57p	Time Arrived	12:53p	Final Update	147p
Superintendent Action:					
 (over) Senior Service Inspector					

CITY OF DETROIT
DEPARTMENT OF TRANSPORTATION
TRANSPORTATION OPERATIONS DIVISION
SERVICE INSPECTOR ACCIDENT REPORT

OPERATOR NAME Jones, Eric BADGE 3643 DATE 01/03/13
COACH 4187 RUN 19 LINE 16 LOCATION Cass Ave & Antoinette

WHAT DRIVERS WERE DOING

Making a right

Vehicle #1

Vehicle #3

Vehicle #3

Going straight

Coach

... making a right, left or U turn, going straight,
slowing down or stopping, changing lanes, leaving
curb, parked, backing or other

TRAFFIC CONTROL

Signal light

signal lights, stop sign, railroad lights, open
intersection, none or other

Point of impact Other Object

Damage to Other Property

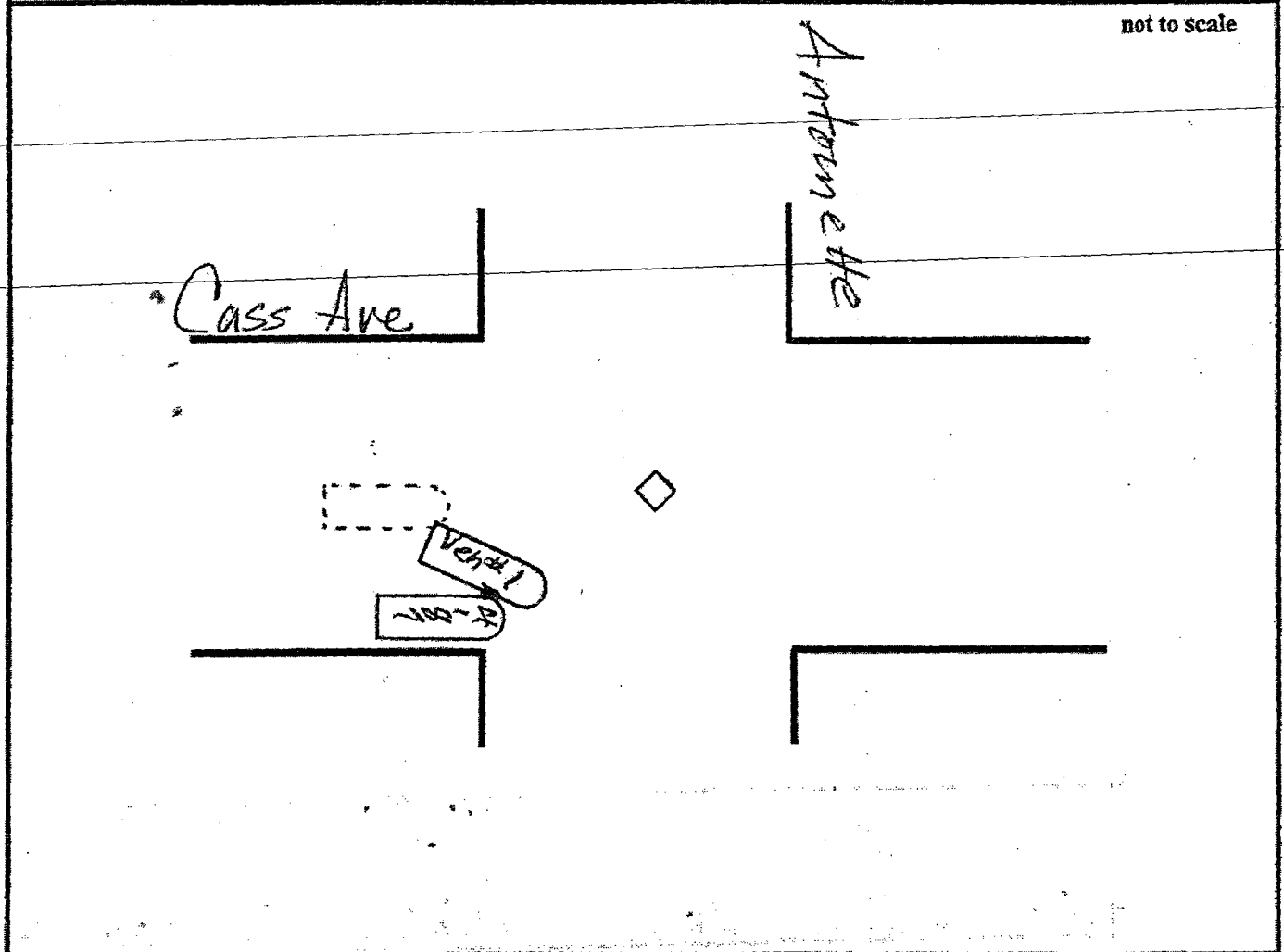
Major damage to
front passenger door and right
side windshield - No other
property damage

Indicate NORTH



William H. Rogers
Senior Service Inspector

not to scale



RDV 07/07

OPERATOR NAME Jones, Eric ^{Lizmo#} BADGE 3643 DATE: 01103113
COACH 4187 RUN 19 LINE 16 LOCATION Cass Ave & Antoinette

**DETROIT DEPARTMENT OF TRANSPORTATION (DDOT)
POST-ACCIDENT RECORD OF DECISIONS**

Manager/Supervisor: this form is to be used to document action taken following an accident involving a city-owned vehicle. FTA policy requires the testing of the vehicle operator and other employees whose performance could have contributed to the accident

Employee Name Tones, Eric Job Title TEO
 Badge# (If TEO) or Pension# or Social Security# 3643 - Lic No# [REDACTED]

ACCIDENT INFORMATION:

Date 01-03-13 Time 12:45p Location Cass and Antoinette
 Vehicle Number 4187 Route 16 Run 19

SECTION I

TEST AUTHORITY DETERMINATION TABLE

Use below to indicate the results of the accident and required test. Check only one accident result. If based on all facts you have it appears that the driver is NOT a possible cause of the accident, circle option "C" (No Test needed)" below.

VEHICLE ACCIDENT RESULTS	TEST AUTHORITY: FTA or DDOT
Revenue vehicle (Bus) with fatality	FTA
<input checked="" type="checkbox"/> Revenue vehicle (Bus) with injury requiring medical treatment away from scene	FTA
Revenue vehicle (Bus) with any vehicle towed OR disabling damage*	FTA
Non-Revenue vehicle operated by Safety-Sensitive Person with fatality	FTA
Non-Revenue vehicle operating by Safety Sensitive Person with injury requiring medical treatment away from the scene	FTA
Non-Revenue vehicle operating by Safety Sensitive Person with any vehicle towed OR disabling damage*	FTA
FTA Post Accident requirements NOT met.	DDOT

POST ACCIDENT TEST REQUIRED (circle one)

- ☒ A) FTA (Regulated)
☐ B) DDOT (Non-Regulated)
☐ C) No Test Needed

*Disabling Damage—damage that precludes the departure of any vehicle from the scene of the occurrence in its usual manner in daylight after simple repairs. Disabling damage includes damage to vehicles that could have been operated but would have been further damaged if so operated, but does not include damage which can be remedied temporarily at the scene of the occurrence without special tools or parts. tire disablement without other damage even if no spare is available, or damage to headlights, taillights, turn signal, horn, mirrors, or windshield wipers that makes them inoperative.

SECTION II

All safety-sensitive and non-safety-sensitive employees whose performance could also have contributed to the accident, based on the best information available at the time of the decision will also be tested for the presence of drugs and alcohol.

STATUS OF THIS EMPLOYEE (circle one): Vehicle Operator Other: _____

Are any other people to be tested as a result of this accident (circle one)?

Yes No Unknown at this time; investigation on going.

If yes, names(s) _____

Describe Accident Involvement of People listed above.

SECTION III

Following an accident, the Department will attempt to complete an alcohol test within 2 hours of the accident. If not able to obtain it within 2 hours, they will file a written report as to why they were not able and continue attempts to obtain specimen. If they are not able to obtain specimen in 8 hours, they will cease attempts to obtain specimen and update the 2-hour written report.

Any safety sensitive or non-safety-sensitive employee will be drug tested as soon as possible, but not to exceed thirty-two (32) hours for drug testing. If not able to obtain drug testing within 32 hours a written report must explain the reason for not testing earlier.

Test Site Arrival Time: 1:55 p

Elapsed Time (between accident and test site arrival): 1 hr 10 min's

Is the Elapsed Time less than 2 hours? (Attempt to test must cease after 8 hours) Yes No

If no, state reason (s) below:

Is the Elapsed Time less than 32 hours? (Attempt to test must cease after 32 hours) Yes No

If no, state reason(s) below:

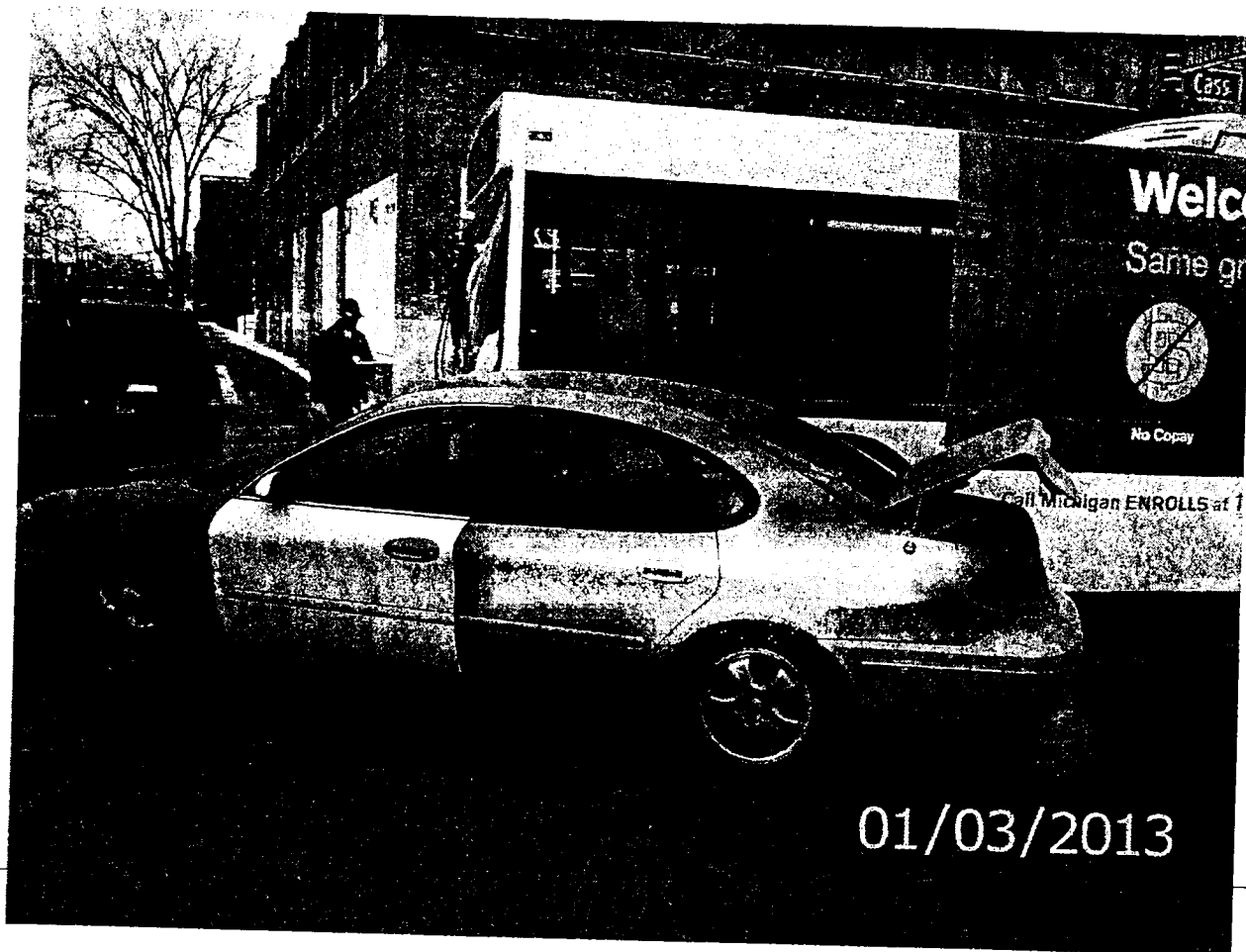
Signature: Deborah Ryan

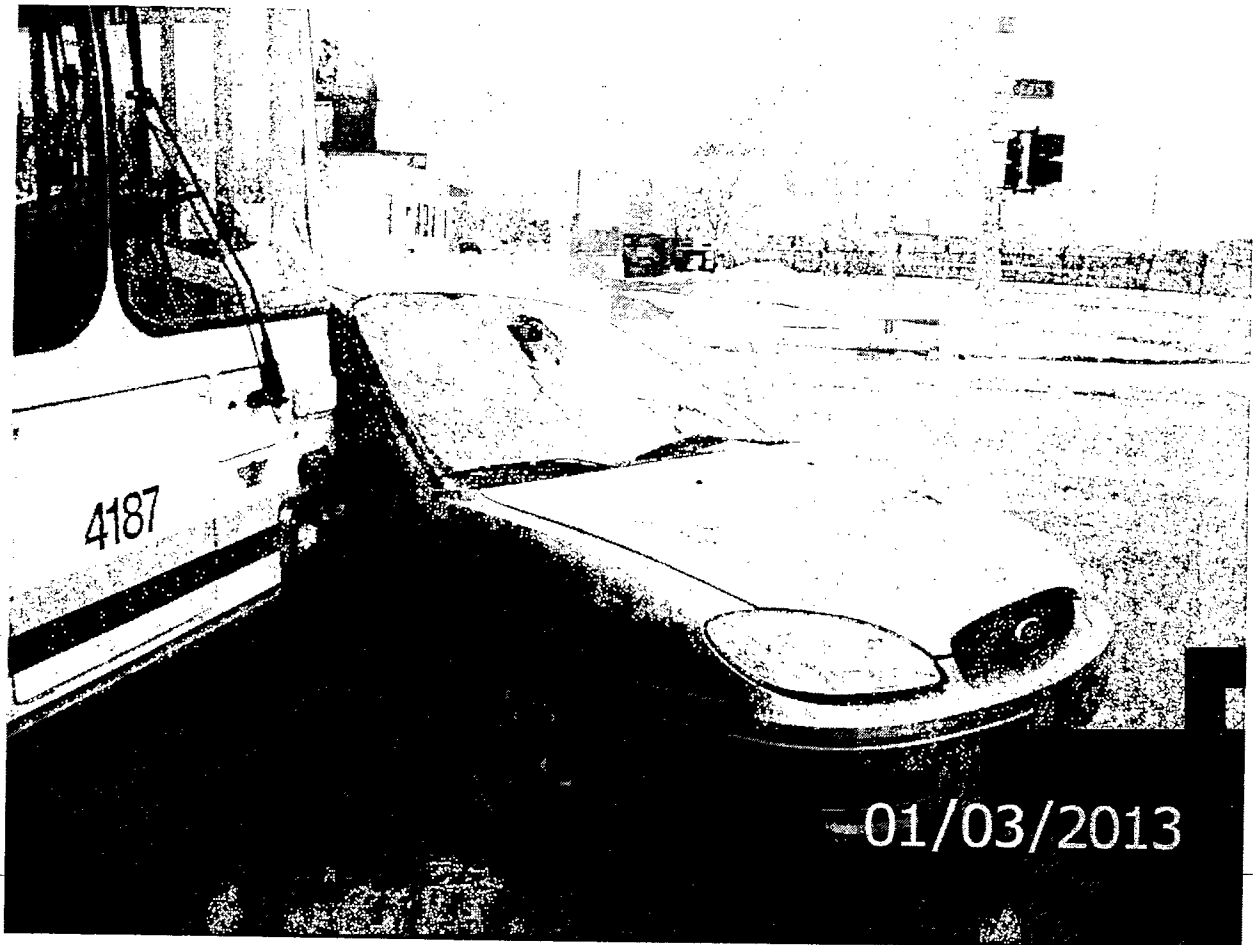
Name (Print): Deborah Ryan

Date: 01-03-13 Time: 2:20 p

This document must be retained on file, with the accident report, as a record of decisions. A copy must immediately be sent to the DER to be filed with test report(s).

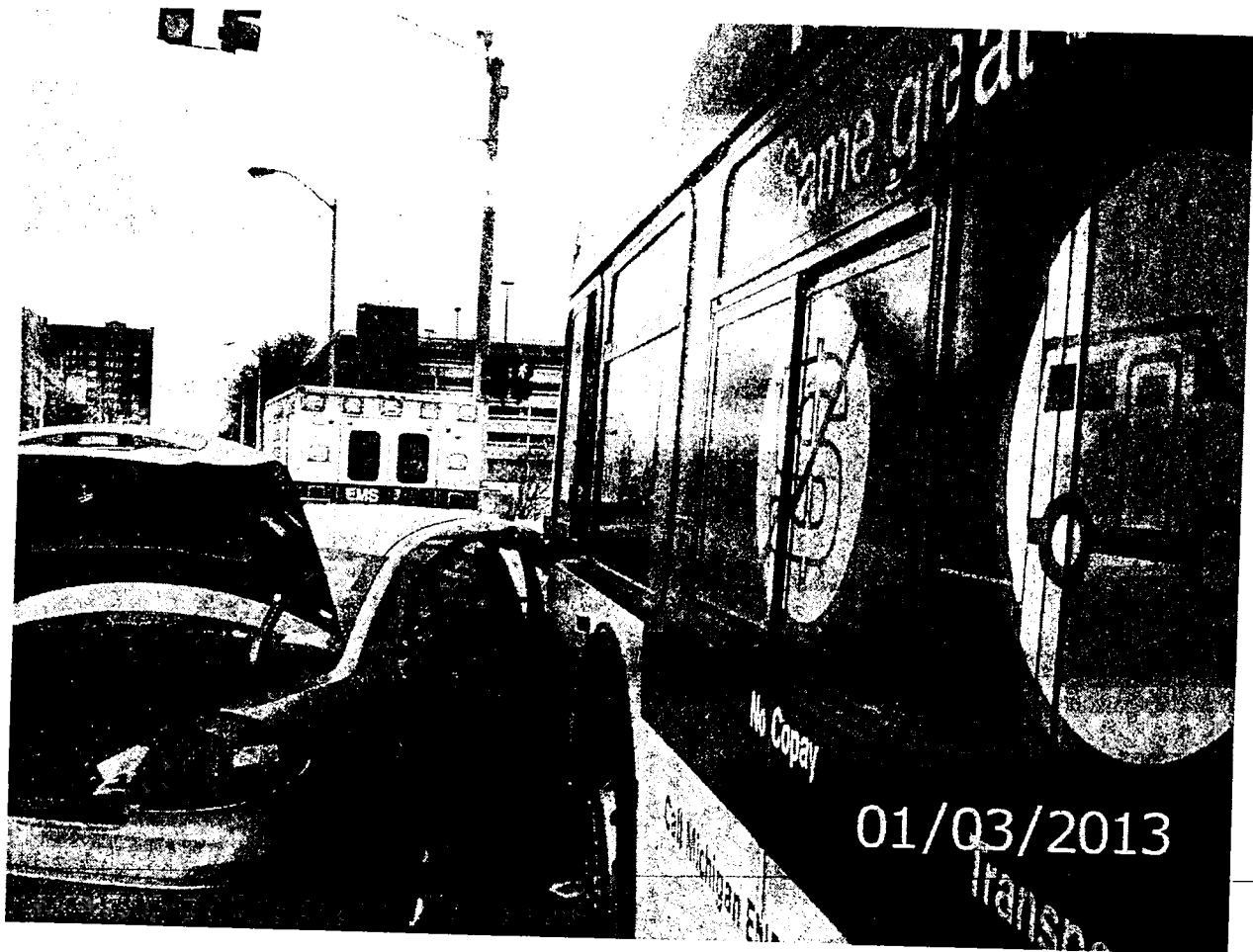
Rev: 8/4/08













WARREN CHIROPRACTIC & REHAB
19201 W. WARREN
DETROIT, MI 48228
(313)240-7950

Statement Date
8/31/2013

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JAMIE SIMPSON
[REDACTED]
DETROIT, MI 48214

Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
Date of Last Payment:		Amount:	0.00	
Patient: JAMIE SIMPSON		Chart #: SIMJA000	Case Description: BUS ACCIDENT	
1/18/2013	1308290000	OFFICE VISIT (NEW PATIENT)	2921	150.00
1/18/2013	1308290000	CERV AP-LAT (2-3 views)	2921	100.00
1/18/2013	1308290000	THORACIC AP/LAT	2921	150.00
1/18/2013	1308290000	LUMBAR AP/LAT (2-3 views)	2921	150.00
1/23/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
1/23/2013	1308290000	MASSAGE THERAPY	2921	55.00
1/23/2013	1308290000	MECHANICAL TRACTION	2921	55.00
1/23/2013	1308290000	HOT/COLD PACKS	2921	45.00
1/25/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
1/25/2013	1308290000	MASSAGE THERAPY	2921	55.00
1/25/2013	1308290000	MECHANICAL TRACTION	2921	55.00
1/25/2013	1308290000	HOT/COLD PACKS	2921	45.00
1/28/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
1/28/2013	1308290000	MASSAGE THERAPY	2921	55.00
1/28/2013	1308290000	MECHANICAL TRACTION	2921	55.00
1/28/2013	1308290000	HOT/COLD PACKS	2921	45.00
1/30/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
1/30/2013	1308290000	MASSAGE THERAPY	2921	55.00
1/30/2013	1308290000	MECHANICAL TRACTION	2921	55.00
1/30/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/2/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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JAMIE SIMPSON
[REDACTED]
DETROIT, MI 48214

Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
2/2/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/2/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/2/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/4/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/4/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/4/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/4/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/6/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/6/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/6/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/6/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/8/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/8/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/8/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/8/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/11/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/11/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/11/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/11/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/13/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/13/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/13/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/13/2013	1308290000	HOT/COLD PACKS	2921	45.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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JAMIE SIMPSON

DETROIT, MI 48214

Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
2/15/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/15/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/15/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/15/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/18/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/18/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/18/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/18/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/20/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/20/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/20/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/20/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/22/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/22/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/22/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/22/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/27/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/27/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/27/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/27/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/1/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/1/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/1/2013	1308290000	MECHANICAL TRACTION	2921	55.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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JAMIE SIMPSON

DETROIT, MI 48214

Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
3/1/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/4/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/4/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/4/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/4/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/6/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/6/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/6/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/6/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/8/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/8/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/8/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/8/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/13/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/13/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/13/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/13/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/15/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/15/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/15/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/15/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/20/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/20/2013	1308290000	MASSAGE THERAPY	2921	55.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
3/20/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/20/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/22/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/22/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/22/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/22/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/27/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/27/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/27/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/27/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/29/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/29/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/29/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/29/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/3/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/3/2013	1308290000	MASSAGE THERAPY	2921	55.00
4/3/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/3/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/6/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/6/2013	1308290000	MASSAGE THERAPY	2921	55.00
4/6/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/6/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/8/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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JAMIE SIMPSON

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Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
4/8/2013	1308290000	MASSAGE THERAPY	2921	55.00
4/8/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/8/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/10/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/10/2013	1308290000	MASSAGE THERAPY	2921	55.00
4/10/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/10/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/12/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/12/2013	1308290000	MASSAGE THERAPY	2921	55.00
4/12/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/12/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/17/2013	1308290000	10 MIN OV (FOCUSED) established patient	2921	50.00
4/17/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/17/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/17/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
4/17/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/19/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/19/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/19/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
4/19/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/22/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/22/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/22/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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JAMIE SIMPSON

DETROIT, MI 48214

Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
4/22/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/26/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/26/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/26/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
4/26/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/29/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/29/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/29/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
4/29/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/2/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/2/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/2/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/2/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/3/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/3/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/3/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/3/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/6/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/6/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/6/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/6/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/8/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/8/2013	1308290000	MECHANICAL TRACTION	2921	55.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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19201 W. WARREN
DETROIT, MI 48228
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JAMIE SIMPSON

DETROIT, MI 48214

Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
5/8/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/8/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/13/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/13/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/13/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/13/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/15/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/15/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/20/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/20/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/20/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/20/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/22/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/22/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/22/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/22/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/24/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/24/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/24/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/24/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/29/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/29/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/29/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

WARREN CHIROPRACTIC & REHAB
19201 W. WARREN
DETROIT, MI 48228
(313)240-7950

Statement Date
8/31/2013

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JAMIE SIMPSON

DETROIT, MI 48214

Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
5/29/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/3/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/3/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/3/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/3/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/7/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/7/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/7/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/7/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/10/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/10/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/10/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/10/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/14/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/14/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/14/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/14/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/17/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/17/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/17/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/17/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/21/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/21/2013	1308290000	MECHANICAL TRACTION	2921	55.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

WARREN CHIROPRACTIC & REHAB
19201 W. WARREN
DETROIT, MI 48228
(313)240-7950

Statement Date
8/31/2013

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JAMIE SIMPSON

DETROIT, MI 48214

Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
6/21/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/21/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/26/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/26/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/26/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/26/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/28/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/28/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/28/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/28/2013	1308290000	HOT/COLD PACKS	2921	45.00
7/1/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
7/1/2013	1308290000	MECHANICAL TRACTION	2921	55.00
7/1/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
7/1/2013	1308290000	HOT/COLD PACKS	2921	45.00
7/10/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
7/10/2013	1308290000	MECHANICAL TRACTION	2921	55.00
7/10/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
7/10/2013	1308290000	HOT/COLD PACKS	2921	45.00
7/12/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
7/12/2013	1308290000	MECHANICAL TRACTION	2921	55.00
7/12/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
7/12/2013	1308290000	HOT/COLD PACKS	2921	45.00
7/18/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

WARREN CHIROPRACTIC & REHAB
19201 W. WARREN
DETROIT, MI 48228
(313)240-7950

Statement Date
8/31/2013

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JAMIE SIMPSON

DETROIT, MI 48214

Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
7/18/2013	1308290000	MECHANICAL TRACTION	2921	55.00
7/18/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
7/18/2013	1308290000	HOT/COLD PACKS	2921	45.00
7/19/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
7/19/2013	1308290000	MECHANICAL TRACTION	2921	55.00
7/19/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
7/19/2013	1308290000	HOT/COLD PACKS	2921	45.00
7/26/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
7/26/2013	1308290000	MECHANICAL TRACTION	2921	55.00
7/26/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
7/26/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/1/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/1/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/1/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/1/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/2/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/2/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/2/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/2/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/7/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/7/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/7/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/7/2013	1308290000	HOT/COLD PACKS	2921	45.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

WARREN CHIROPRACTIC & REHAB
19201 W. WARREN
DETROIT, MI 48228
(313)240-7950

Statement Date
8/31/2013

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JAMIE SIMPSON

DETROIT, MI 48214

Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
8/12/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/12/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/12/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/12/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/15/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/15/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/15/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/15/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/20/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/20/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/20/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/20/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/21/2013	1308290000	10 MIN OV (FOCUSED) established patient	2921	50.00
8/21/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/21/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/21/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/21/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/31/2013	1309130000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/31/2013	1309130000	MECHANICAL TRACTION	2921	55.00
8/31/2013	1309130000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/31/2013	1309130000	HOT/COLD PACKS	2921	45.00

Total Charges	Total Payments	Total Adjustments	Balance Due
\$15960.00	\$0.00	\$0.00	\$ 15,960.00

*Law Offices
Of
David J. Jarrett P.C.
Professional Corporation*

12820 Ford Rd., Suite 1, Dearborn, Michigan 48126

Office: (313) 943-3113

Fax: (313) 582-0050

May 14, 2013

SENT VIA FAX ONLY
313-224-5505

City Of Detroit
2 Woodward Avenue, Suite 500
Detroit, MI 48226-3535
Attn: Monique Tyler

Re:	My Client:	Jamie Simpson
	Date of Loss:	Jan. 3, 2013
	Claim No.:	A32950-002763-07

Dear Monique Tyler:

On behalf of the above client, I am making a household services demand. In support of the claim are Statements of Services Rendered and Disability Certificates.

The amount of the current claim for household services outstanding is \$2,340.00 (01-4-13 through 04-30-13, 117 days x \$20.00 per day).

Please forward the check for the sum of \$2,340.00 payable to my client and David J. Jarrett, P.C. (38-3477312) at the above address.

Thanking you in advance for your anticipated cooperation.

Very truly yours,



DAVID J. JARRETT, P.C.

Warren Chiropractic & Rehab Clinic P.C.
Dr. John Mousa Mufarreh D.C.
19201 W. Warren
Detroit, MI. 48228

Office (313) 240-7950

Fax (313) 240-7970

Disability Certificate

Mr./Mrs./Ms. Janie Simpson was examined and/or is being
treated in this office for injuries sustained on: 1-3-13

It is my professional opinion that the patient is disabled as a result of the foregoing
condition from performing the activities listed below:

- ☒ Employment, which involves bending, lifting, twisting and prolonged
standing and/or sitting.
- ☒ Housework and caring for the patient's children which involves bending,
lifting, twisting and prolonged standing as required by changing children's
clothes. Bathing children, cooking for the children, feeding children, cleaning
or straightening up after the children, cooking, etc.
- ☒ Caring for the patient's personal needs, which includes bending, twisting,
lifting, prolonged standing as required by bathing the patient, dressing the
patient, cooking for the patient, fetching, carrying and lifting things for the
patient, etc.
- ☒ Patient is unable to drive due to:
- ☒ Medical condition / Physical limitations / Under the effects of medication
- ☐ No transportation
- ☐ No license / Minor

The patient is/was disabled from performing the above from:

1-3-13 to 3-31-13

It is my opinion that the patient requires nursing care, as he/she requires assistance with
the following:

- ☐ Assistance with bathing and/or in and out of tub
- ☐ Assistance to and from and/or in the bathroom or with a bedpan
- ☐ Assistance with personal grooming
- ☐ Assistance with transfers from room to room, bed to chair, etc.
- ☐ Assistance with dressing
- ☐ Assistance with fetching, carrying and lifting things
- ☐ Assistance with in-home therapy
- ☐ Driving/providing transportation
- ☐ Other: 24 hour assistance/supervision

The patient does/did require assistance caring for the patient's personal needs from:
_____ to _____ for _____ hours per day;

Doctor's Signature

Date

2-6-13

Warren Chiropractic & Rehab Clinic P.C.
Dr. John Mousa Mufarreah D.C.
19201 W. Warren
Detroit, MI. 48228

Office (313) 240-7950

Fax (313) 240-7970

Disability Certificate

Mr./Mrs./Ms. Samie Simpson was examined and/or is being
treated in this office for injuries sustained on: 1-3-13

It is my professional opinion that the patient is disabled as a result of the foregoing
condition from performing the activities listed below:

- ☒ Employment, which involves bending, lifting, twisting and prolonged
standing and/or sitting.
- ☒ Housework and caring for the patient's children which involves bending,
lifting, twisting and prolonged standing as required by changing children's
clothes. Bathing children, cooking for the children, feeding children, cleaning
or straightening up after the children, cooking, etc.
- ☒ Caring for the patient's personal needs, which includes bending, twisting,
lifting, prolonged standing as required by bathing the patient, dressing the
patient, cooking for the patient, fetching, carrying and lifting things for the
patient, etc.
- ☒ Patient is unable to drive due to:
☒ Medical condition / Physical limitations / Under the effects of medication
☐ No transportation
☐ No license / Minor

The patient is/was disabled from performing the above from:

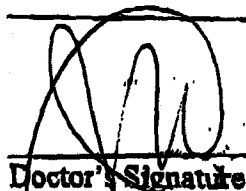
3-31-13 to 4-30-13

It is my opinion that the patient requires nursing care, as he/she requires assistance with
the following:

- ☐ Assistance with bathing and/or in and out of tub
- ☐ Assistance to and from and/or in the bathroom or with a bedpan
- ☐ Assistance with personal grooming
- ☐ Assistance with transfers from room to room, bed to chair, etc.
- ☐ Assistance with dressing
- ☐ Assistance with fetching, carrying and lifting things
- ☐ Assistance with in-home therapy
- ☐ Driving/providing transportation
- ☐ Other: 24 hour assistance/supervision

The patient does/did require assistance caring for the patient's personal needs from:

 to for hours per day;


Doctor's Signature

4-3-13
Date

Warren Chiropractic & Rehab Clinic P.C.
Dr. John Mousa Mufarreah D.C.
19201 W. Warren
Detroit, MI. 48228

Office (313) 240-7950

Fax (313) 240-7970

Disability Certificate

Mr./Mrs./Ms. Jamie Simpson was examined and/or is being treated in this office for injuries sustained on: 1-3-13

It is my professional opinion that the patient is disabled as a result of the foregoing condition from performing the activities listed below:

- ☒ Employment, which involves bending, lifting, twisting and prolonged standing and/or sitting.
- ☒ Housework and caring for the patient's children which involves bending, lifting, twisting and prolonged standing as required by changing children's clothes. Bathing children, cooking for the children, feeding children, cleaning or straightening up after the children, cooking, etc.
- ☒ Caring for the patient's personal needs, which includes bending, twisting, lifting, prolonged standing as required by bathing the patient, dressing the patient, cooking for the patient, fetching, carrying and lifting things for the patient, etc.
- ☒ Patient is unable to drive due to:
 - ☒ Medical condition / Physical limitations / Under the effects of medication
 - ☐ No transportation
 - ☐ No license / Minor

The patient is/was disabled from performing the above from:

4-30-13 to 5-3-13

It is my opinion that the patient requires nursing care, as he/she requires assistance with the following:

- ☐ Assistance with bathing and/or in and out of tub
- ☐ Assistance to and from and/or in the bathroom or with a bedpan
- ☐ Assistance with personal grooming
- ☐ Assistance with transfers from room to room, bed to chair, etc.
- ☐ Assistance with dressing
- ☐ Assistance with fetching, carrying and lifting things
- ☐ Assistance with in-home therapy
- ☐ Driving/providing transportation
- ☐ Other: 24 hour assistance/supervision

The patient does/did require assistance caring for the patient's personal needs from:

_____ to _____ for _____ hours per day;


Doctor's Signature

5-1-13
Date

Household (Replacement) Services Statement

Claimant's Name: Jamie Simpson

Claim Number: _____

Date of Loss: 1/1

Service Provider's Name: Terrell Simpson

Service Provider's Address (Street, City, State): _____

Det Mi

Service Provider's Telephone #: 734 757-3486

Service Provider's SS#: _____

Describe specifically what services were provided by putting the LETTER in the appropriate date below

- | | | | |
|-----------------------|----------------------|---------------------|--------------------|
| A. Vacuuming | B. Dusting | C. Cooking | D. Dishwashing |
| E. Making Beds | F. Ironing | G. Laundry | H. Changing Linens |
| I. Snow Shoveling | J. Grass Cutting | K. Grocery Shopping | L. Driving |
| M. Taking out Garbage | N. Running Errands | O. Child Care | P. Window Washing |
| Q. Home Repairs | R. Misc/Other: _____ | | |

MONTH: Jan 4 YEAR: 2013

					⁴ B, C, D, A	⁵ F, B, A
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
⁶ E, A, B C	⁷ F, E, A, B	⁸ D, H, G C	⁹ B, C, D, A	¹⁰ N, B, C, D	¹¹ A, m, B, D	¹² A, C, D, B
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
¹³ H, B, C, D	¹⁴ m, B, C, D	¹⁵ A, B, D, H	¹⁶ F, B, C, D	¹⁷ m, L, B, C	¹⁸ F, G, B, A	¹⁹ C, A, D, H
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
²⁰ L, B, C, D	²¹ A, C, D, B	²² H, P, E, B	²³ A, C, E, B	²⁴ C, B, A, D	²⁵ D, B, A, G	²⁶ D, C, B, A
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
²⁷ C, D, A, B	²⁸ m, A, B, C	²⁹ D, H, G, B	³⁰ B, E, H, C	³¹ D, C, A, E		
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00				

I, the undersigned, have not performed these services on a regular basis prior to the injured person's accident date as indicated above and swear that it is true and correct.

Service Provider's Signature: _____

Terrell Simpson

Date: 2/1/13

Household (Replacement) Services Statement

Claimant's Name: Jamie Simpson

Claim Number: _____

Date of Loss: 1/1

Service Provider's Name: Terrell Simpson

Service Provider's Address (Street, City, State): [Redacted] Del MI

Service Provider's Telephone #: 734 757-3486

Service Provider's SS#: [Redacted]

Describe specifically what services were provided by putting the LETTER in the appropriate date below

- | | | | |
|-----------------------|----------------------|---------------------|--------------------|
| A. Vacuuming | B. Dusting | C. Cooking | D. Dishwashing |
| E. Making Beds | F. Ironing | G. Laundry | H. Changing Linens |
| I. Snow Shovelling | J. Grass Cutting | K. Grocery Shopping | L. Driving |
| M. Taking out Garbage | N. Running Errands | O. Child Care | P. Window Washing |
| Q. Home Repairs | R. Misc/Other: _____ | | |

MONTH: Feb YEAR: 2013

					B, A, C, D ¹	G, C, E, B ²
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
A, B, C, D ³	B, C, D, A ⁴	G, H, D, B ⁵	L, B, A, E ⁶	D, A, B ⁷	L, B, E, A ⁸	H, D, C, A ⁹
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
B, A, G, C ¹⁰	m, B, A, E ¹¹	C, B, A, H ¹²	C, B, A, D ¹³	A, E, F, B ¹⁴	H, C, B, A ¹⁵	m, B, C, D ¹⁶
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
A, B, D, E ¹⁷	C, B, A, F ¹⁸	G, D, H, B ¹⁹	A, C, B, D ²⁰	N, B, C, A ²¹	B, A, C, D ²²	F, B, C, A ²³
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
E, B, C, D ²⁴	B, A, C, D ²⁵	B, A, C, D ²⁶	A, E, B, G ²⁷	C, D, A, B ²⁸	G, A, C, D ²⁹	
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00				

I, the undersigned, have not performed these services on a regular basis prior to the injured person's accident date as indicated above and swear that it is true and correct.

Service Provider's Signature: _____

Date: 3/2/13

Household (Replacement) Services Statement

Claimant's Name: Jamie Simpson

Claim Number: _____

Date of Loss: 1 / 1

Service Provider's Name: Terrell Simpson

Service Provider's Address (Street, City, State): [Redacted] Del Mi

Service Provider's Telephone #: 734 757-3486

Service Provider's SS#: [Redacted]

Describe specifically what services were provided by putting the LETTER in the appropriate date below

- | | | | |
|-----------------------|----------------------|---------------------|--------------------|
| A. Vacuuming | B. Dusting | C. Cooking | D. Dishwashing |
| E. Making Beds | F. Ironing | G. Laundry | H. Changing Linens |
| I. Snow Shoveling | J. Grass Cutting | K. Grocery Shopping | L. Driving |
| M. Taking out Garbage | N. Running Errands | O. Child Care | P. Window Washing |
| Q. Home Repairs | R. Misc/Other: _____ | | |

MONTH: March YEAR: 2013

					1 E, B, C, D Amt: \$20.00	2 A, B, H, E Amt: \$20.00
3 A, B, C, D Amt: \$20.00	4 B, C, D, A Amt: \$20.00	5 F, G, H, A Amt: \$20.00	6 C, B, E, A Amt: \$20.00	7 C, A, D, B Amt: \$20.00	8 H, C, B, O Amt: \$20.00	9 A, B, E, F Amt: \$20.00
10 C, D, m, G Amt: \$20.00	11 H, B, C, A Amt: \$20.00	12 C, B, E, A Amt: \$20.00	13 B, C, D, A Amt: \$20.00	14 m, B, C, G Amt: \$20.00	15 A, B, D, L Amt: \$20.00	16 F, G, H, A Amt: \$20.00
17 H, B, C, D Amt: \$20.00	18 F, G, H, m Amt: \$20.00	19 B, C, D, A Amt: \$20.00	20 F, G, B, A Amt: \$20.00	21 H, D, C, A Amt: \$20.00	22 F, B, E, C Amt: \$20.00	23 C, B, A, D Amt: \$20.00
24 L, G, H, F Amt: \$20.00	25 B, C, D, A Amt: \$20.00	26 B, C, D, A Amt: \$20.00	27 D, G, F, E Amt: \$20.00	28 H, B, C, A Amt: \$20.00	29 C, B, F, G Amt: \$20.00	30 B, C, A, F Amt: \$20.00
						31 G, H, B, A Amt: \$20.00

I, the undersigned, have not performed these services on a regular basis prior to the injured person's accident date as indicated above and swear that it is true and correct.

Service Provider's Signature: _____

Date: 4/2/13

Household (Replacement) Services Statement

Claimant's Name: Jamie Simpson

Claim Number: _____

Date of Loss: 1 / 1

Service Provider's Name: Terrell Simpson

Service Provider's Address (Street, City, State): _____

Del Mi

Service Provider's Telephone #: 734 757-3486

Service Provider's SS#: _____

Describe specifically what services were provided by putting the LETTER in the appropriate date below

- | | | | |
|-----------------------|----------------------|---------------------|--------------------|
| A. Vacuuming | B. Dusting | C. Cooking | D. Dishwashing |
| E. Making Beds | F. Ironing | G. Laundry | H. Changing Linens |
| I. Snow Shovelling | J. Grass Cutting | K. Grocery Shopping | L. Driving |
| M. Taking out Garbage | N. Running Errands | O. Child Care | P. Window Washing |
| Q. Home Repairs | R. Misc/Other: _____ | | |

MONTH: April YEAR: 2013

	¹ B, C, D, A	² M, C, D, B	³ A, B, D, C	⁴ B, C, A, M	⁵ G, D, H, C	⁶ B, A, C, E
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
⁷ M, G, H, A	⁸ A, F, G, H	⁹ G, H, I, F	¹⁰ D, A, B, F	¹¹ A, C, D, B	¹² H, B, C, A	¹³ F, B, C, A
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
¹⁴ F, G, C, E, B	¹⁵ C, D, A, B	¹⁶ H, B, C, A	¹⁷ M, E, A, B	¹⁸ C, F, A, B	¹⁹ B, C, D, A	²⁰ F, C, A, B
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
²¹ M, H, A, C	²² E, A, D, M	²³ F, C, D, A	²⁴ L, G, H, B	²⁵ B, C, A, D	²⁶ L, M, G, H	²⁷ C, D, A, B
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
²⁸ C, B, A, D	²⁹ C, D, M, A	³⁰ B, C, A, E	³¹ 28	³² 2		
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00				

I, the undersigned, have not performed these services on a regular basis prior to the injured person's accident date as indicated above and swear that it is true and correct.

Service Provider's Signature: _____

Terrell Simpson

Date: 5/2/13

Household (Replacement) Services Statement

Claimant's Name: Jamie Simpson

Claim Number: _____

Date of Loss: 1 / 1

Service Provider's Name: Terrell Simpson

Service Provider's Address (Street, City, State): _____

Del Mi

Service Provider's Telephone #: 734 757-3486

Service Provider's SS#: _____

Describe specifically what services were provided by putting the LETTER in the appropriate date below

- | | | | |
|-----------------------|----------------------|---------------------|--------------------|
| A. Vacuuming | B. Dusting | C. Cooking | D. Dishwashing |
| E. Making Beds | F. Ironing | G. Laundry | H. Changing Linens |
| I. Snow Shoveling | J. Grass Cutting | K. Grocery Shopping | L. Driving |
| M. Taking out Garbage | N. Running Errands | O. Child Care | P. Window Washing |
| Q. Home Repairs | R. Misc/Other: _____ | | |

MONTH: May YEAR: 2013

			¹ B, C, D, A	² M, C, D, B	³ A, B, D, C	⁴ B, C, A, M
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
⁵ B, A, C, E	⁶ G, H, D, C	⁷ M, G, H, A	⁸ A, F, G, H	⁹ G, H, I, F	¹⁰ D, A, B, F	¹¹ A, C, D, B
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
¹² F, B, C, A	¹³ H, B, C, A	¹⁴ F, G, C, E	¹⁵ C, D, A, B	¹⁶ H, B, C, A	¹⁷ M, E, A, B	¹⁸ C, F, A, B
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
¹⁹ F, C, A, B	²⁰ B, C, D, A	²¹ M, H, A, C	²² E, A, D, M	²³ F, C, D, A	²⁴ L, G, H, B	²⁵ B, C, A D
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
²⁶ C, D, A, B	²⁷ L, M, G, H	²⁸ C, B, A, D	²⁹ C, D, M, A	³⁰ B, C, A, E	³¹ F, C, D, A	
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00				

I, the undersigned, have not performed these services on a regular basis prior to the injured person's accident date as indicated above and swear that it is true and correct.

Service Provider's Signature: _____

Date: _____

Household (Replacement) Services Statement

Claimant's Name: Jamie Simpson

Claim Number: _____

Date of Loss: 1 / 1

Service Provider's Name: Terrell Simpson

Service Provider's Address (Street, City, State): _____

Det Mi

Service Provider's Telephone #: 734 757-3486

Service Provider's SS#: _____

Describe specifically what services were provided by putting the LETTER in the appropriate date below

- | | | | |
|-----------------------|----------------------|---------------------|--------------------|
| A. Vacuuming | B. Dusting | C. Cooking | D. Dishwashing |
| E. Making Beds | F. Ironing | G. Laundry | H. Changing Linens |
| I. Snow Shovelling | J. Grass Cutting | K. Grocery Shopping | L. Driving |
| M. Taking out Garbage | N. Running Errands | O. Child Care | P. Window Washing |
| Q. Home Repairs | R. Misc/Other: _____ | | |

MONTH: June YEAR: 2013

						B, C, D, A
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
2 G, H, D, C	3 M, G, H, A	4 A, B, D, C	5 B, C, A, M	6 G, H, D, C	7 M, C, D, B	8 A, F, G, H
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
9 H, B, C, A	10 F, G, B, C	11 D, A, B, F	12 A, C, D, B	13 H, B, C, A	14 G, H, I, F	15 C, D, A, B
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
16 B, C, D, A	17 M, H, A, C	18 M, E, A, B	19 C, F, A, B	20 B, C, D, A	21 H, B, C, D	22 E, A, D, M
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00	Amt: \$20.00
23 L, M, G, H, C	24 C, B, A, D	25 L, G, H, B	26 B, C, A, D	27 L, M, G, H	28 F, C, D, B	29 C, D, M, A
Amt: \$20.00	Amt: \$20.00	Amt: \$20.00				
						30 B, C, D, A

I, the undersigned, have not performed these services on a regular basis prior to the injured person's accident date as indicated above and swear that it is true and correct.

Service Provider's Signature: _____

Terrell Simpson

Date: _____

Household (Replacement) Services Statement

Claimant's Name: Jamie Simpson

Claim Number: _____

Date of Loss: 1 / 1

Service Provider's Name: Terrell Simpson

Service Provider's Address (Street, City, State): [Redacted] Del Mi

Service Provider's Telephone #: 734 757-3486 Service Provider's SS#: [Redacted]

Describe specifically what services were provided by putting the LETTER in the appropriate date below

- | | | | |
|-----------------------|----------------------|---------------------|--------------------|
| A. Vacuuming | B. Dusting | C. Cooking | D. Dishwashing |
| E. Making Beds | F. Ironing | G. Laundry | H. Changing Linens |
| I. Snow Shoveling | J. Grass Cutting | K. Grocery Shopping | L. Driving |
| M. Taking out Garbage | N. Running Errands | O. Child Care | P. Window Washing |
| Q. Home Repairs | R. Misc/Other: _____ | | |

MONTH: July YEAR: 2013

	1 B, C, D, A Amt: \$20.00	2 M, C, D, B Amt: \$20.00	3 A, B, D, C Amt: \$20.00	4 B, C, A, M Amt: \$20.00	5 G, D, H, C Amt: \$20.00	6 B, A, C, E Amt: \$20.00
7 M, G, H, A Amt: \$20.00	8 A, F, G, H Amt: \$20.00	9 G, H, I, F Amt: \$20.00	10 D, A, B, F Amt: \$20.00	11 A, C, D, B Amt: \$20.00	12 H, B, C, A Amt: \$20.00	13 F, B, C, A Amt: \$20.00
14 F, G, C, E Amt: \$20.00	15 C, D, A, B Amt: \$20.00	16 H, B, C, D Amt: \$20.00	17 M, E, A, B Amt: \$20.00	18 C, F, A, B Amt: \$20.00	19 B, C, D, A Amt: \$20.00	20 F, C, A, B Amt: \$20.00
21 M, H, A, C Amt: \$20.00	22 E, A, D, M Amt: \$20.00	23 F, G, D, A Amt: \$20.00	24 L, H, G, B Amt: \$20.00	25 B, C, A, D Amt: \$20.00	26 L, M, G, H Amt: \$20.00	27 C, D, A, B Amt: \$20.00
28 C, B, A, D Amt: \$20.00	29 C, D, M, A Amt: \$20.00	30 B, C, A, E Amt: \$20.00	31 M, G, H, A Amt: \$20.00			

I, the undersigned, have not performed these services on a regular basis prior to the injured person's accident date as indicated above and swear that it is true and correct.

Service Provider's Signature: _____

Date: _____

Exhibit 6B – Service of Notice of Effective Date

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

Chapter 9

City of Detroit, Michigan,

Case No. 13-53846

Debtor.

Hon. Steven W. Rhodes

CERTIFICATE OF SERVICE

I, Lydia Pastor Nino, certify and say that I am employed by Kurtzman Carson Consultants LLC (KCC), the claims and noticing agent for the Debtor in the above-captioned case.

On or before December 16, 2014, at my direction and under my supervision, employees of KCC caused to be served the following document via First Class mail on the service lists attached hereto as **Exhibit A** and **Exhibit B**:

- Notice of (I) Entry of Order Confirming Eighth Amended Plan for the Adjustment of Debts of the City of Detroit and (II) Occurrence of Effective Date [Docket No. 8649]

Furthermore, on December 22, 2013, at my direction and under my supervision, employees of KCC caused the following documents to be served via Overnight mail on the service list attached hereto as **Exhibit C**, for subsequent distribution to beneficial holders of the securities listed on **Exhibit D**; via First Class mail to the parties on the service list attached hereto as **Exhibit E**; and via Email on the service list attached hereto as **Exhibit F**:

- Notice of (I) Entry of Order Confirming Eighth Amended Plan for the Adjustment of Debts of the City of Detroit and (II) Occurrence of Effective Date [Docket No. 8649]

Dated: December 23, 2014

/s/ Lydia Pastor Nino
Lydia Pastor Nino
KCC
2335 Alaska Ave
El Segundo, CA 90245



Exhibit B
Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country
James, Kelly D	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMES, KELLY D	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Kwanee		7600 W Outer Dr			Detroit	MI	48235-3211	
James, Kimberly	Guerriero, Anthony	Westwood Community Schools General Counsel	6828 Park Ave		Allen Park	MI	48101	
James, Kimberly	Hollowell, Melvin Butch, Jr.	Melvin Butch Hollowell ESQ, PC	100 Riverfront Dr Apt 2011		Detroit	MI	48226	
James, Kimberly	Morgan, Courtney	Morgan & Meyers PLC	3200 Greenfield Rd Ste 260		Dearborn	MI	48120	
James, Kimberly	Pospiech, Debra	Morgan & Meyers PLC	3200 Greenfield Rd Ste 260		Dearborn	MI	48120	
JAMES, KIMBERLY A	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMES, KIMBERLY A	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Lawrence	James, Leah	7754 Piedmont St			Detroit	MI	48228-3328	
JAMES, LINNION JR.	REDACTED	19309 Benlier St			Detroit	MI	48219-1960	
James, Lorenzo	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Lorenzo E	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Lorenzo E	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMES, LORENZO E	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Mack D	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMES, MACK D	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Margaret	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMES, MARGARET	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Marian	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMES, MARIAN	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Mary Jane	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMES, MARY JANE	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Michael	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMES, MICHAEL	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMES, MICHAEL	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Michelle R	REDACTED	18257 Warwick St			Detroit	MI	48219-2817	
JAMES, MITTIE	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Nicholas N	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Nicole	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Nicole S	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMES, NICOLE S	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Quentin N	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Reika	REDACTED	7634 Warwick St			Detroit	MI	48228-3317	
JAMES, RENE	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Richard	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMES, RICHARD	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Sean Roches	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMES, SEAN ROCHESTER	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Sonya	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Sonya	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Steven	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMES, STEVEN	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James, Tameka	REDACTED	20500 Hawthorne St			Detroit	MI	48203-1281	
Jameson, Dorothy	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMESON, DOROTHY	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMESON, DOROTHY	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James-rabbs, Annie	REDACTED	17000 W. 10 Mile Road	2nd Floor		Southfield	MI	48075	
James Lynn Lewandowski	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
James S. Fields	REDACTED	555 Bush #2409			Detroit	MI	48226	
James Simpson	David J. Jarrett, PC	12820 Ford Rd., Suite 1			Dearborn	MI	48361	
Jameson, Denise	REDACTED	8097 Meyers Rd			Detroit	MI	48228-4014	
JAMESON, DOROTHY M	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMIESON, DOROTHY M	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Jamila Jackson	REDACTED	20804 Lange St.			St. Clair Shores	MI	48080	
Jammet, Thomas A	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMINET, THOMAS A	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Jameson Jr., Leonard E	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Jameson, Andre	REDACTED	16903 Strathmoor St			Detroit	MI	48235-4072	
Jameson, George L	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMISON, GEORGE L	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Jameson, Gwendolyn	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMISON, GWENDOLYN	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Jameson, Laney	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
JAMISON, LANEY	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Jameson, Leila Mae	REDACTED	16801 Fenmore St			Detroit	MI	48235-3422	
JAMISON, LEONARD E JR.	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Jameson, Michael N	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

Exhibit 6C – Complaint

STATE OF MICHIGAN THIRD JUDICIAL CIRCUIT WAYNE COUNTY	SUMMONS AND COMPLAINT	CASE NO. 15-016462-NF Hon. John H. Gillis, Jr.
---	-----------------------	--

2 Woodward Ave., Detroit MI 48226

Court Telephone No. 313-224-5243

Plaintiff SIMPSON, JAMIE
Plaintiff's Attorney Lambros L. Andreopoulos, P-45136 28900 Woodward Ave Royal Oak, MI 48067-0942

v

Defendant THE CITY OF DETROIT
Defendant's Attorney <i>Hail</i> <i>2/11/16</i> <i>GT</i>

SUMMONS NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons to **file a written answer with the court** and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state). (MCR 2.111[C])
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.

Issued 12/17/2015	This summons expires 3/17/2016	Court clerk File & Serve Tyler
----------------------	-----------------------------------	-----------------------------------

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

COMPLAINT *Instruction: The following is information that is required to be in the caption of every complaint and is to be completed by the plaintiff. Actual allegations and the claim for relief must be stated on additional complaint pages and attached to this form.*

☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.

Family Division Cases

☐ There is no other pending or resolved action within the jurisdiction of the family division of the circuit court involving the family or family members of the parties.

☐ An action within the jurisdiction of the family division of the circuit court involving the family or family members of the parties has been previously filed in _____ Court.

The action ☐ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.	Judge	Bar no.
------------	-------	---------

General Civil Cases

☐ There is no other pending or resolved civil action arise out of the same transaction or occurrence as alleged in the complaint.

☐ An civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in _____ Court.

The action ☐ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.	Judge	Bar no.
------------	-------	---------

VENUE

Plaintiff(s) residence (include city, township, or village)	Defendant(s) residence (include city, township, or village)
Place where action arose or business conducted	

Date _____ Signature of attorney/plaintiff _____

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.



STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

JAMIE SIMPSON,

Plaintiff,

vs.

THE CITY OF DETROIT,

Defendant.

Case no. 15-_____-NF

HON. _____

15-016462-NF

FILED IN MY OFFICE
WAYNE COUNTY CLERK
12/17/2015 11:32:43 AM
CATHY M. GARRETT

L. LOUIE ANDREOPOULOS (P45136)
DAVID T. HILL (P48771)
Andreopoulos & Hill, PLLC
Attorneys for Plaintiff
28900 Woodward Avenue
Royal Oak, MI 48067
(248) 399-9991; Fax 248-399-9996

There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in this Complaint.

ANDREOPOULOS & HILL, PLLC

/s/ L. Louie Andreopoulos

L. LOUIE ANDREOPOULOS (P45136)
DAVID T. HILL (P48771)

COMPLAINT AND DEMAND FOR JURY TRIAL

NOW COMES the Plaintiff, JAMIE SIMPSON, by and through his attorneys, ANDREOPOULOS & HILL, PLLC, by DAVID T. HILL, and in support of his Complaint against Defendant, jointly and severally, shows unto this Honorable Court as follows:

GENERAL ALLEGATIONS

1. That the Plaintiff is resident of the City of Detroit, County of Wayne, State of Michigan.

2. That Defendant, CITY OF DETROIT was municipal corporation at all times relevant hereto, a Michigan Corporation conducting business in the County of Wayne, State of Michigan.

3. That this case involves a motor vehicle accident which occurred in the City of Detroit, County of Wayne, State of Michigan.

4. That the amount in controversy herein exceeds the sum of Twenty Five Thousand and 00/100 Dollars (\$25,000.00), exclusive of interest, costs, and attorney fees.

COUNT 1: No-Fault Benefits

5. Plaintiff herein re-incorporates by reference and realleges Paragraphs 1 through 4 of the General Allegations of this Complaint with the same force and effect as if same were set forth in full hereunder, and further states:

6. That on or about January 13, 2013, The City of Detroit Department of Transportation was the operator and/owner of a certain DOT Bus vehicle, which was traveling on The Dexter Line on Cass at or near the intersection of Antoinette.

7. That on or about January 13, 2013, Plaintiff, was passenger in said DOT Bus in the City of Detroit, when said bus was involved in a collision with a second vehicle.

8. That on or about January 13, 2013, Defendant Driver, was operating Defendant's vehicle and was involved in said incident in which Plaintiff sustained great bodily injury.

9. That the Defendant City Of Detroit and/or Detroit Department of Transportation (hereinafter Defendant Insurance) is a licensed motor carrier that is self-insured and/or otherwise provides no-fault insurance benefits pursuant to the Michigan No-Fault Act and conducting business in the State of Michigan and, at all times relevant hereto, conducting business in the County of Wayne, State of Michigan.

10. That on or about January 13, 2013, Plaintiff was a passenger, and therefore, was entitled no-fault PIP benefits through Defendant City Of Detroit and/or Detroit Department of Transportation which was self-insured or otherwise had no-fault insurance in accordance with the provisions of MCLA 500.3101, *et seq.* ("No Fault" Act) and Claim # A32950-002763-07

11. That under the terms and conditions of said policy, Defendant City of Detroit became obligated to pay to or on behalf of the Plaintiff certain expenses or losses in the event Plaintiff sustained bodily injuries in an accident while passengers on or pedestrians involved in an accident with Defendant 's City Of Detroit and/or Detroit Department of Transportation.

12. That on January 13, 2013, the Plaintiff were injured by said City Of Detroit and/or Detroit Department of Transportation causing them to sustain certain bodily injuries, necessitating medical treatment and devices, attendant care, wage loss, replacement services, medical transportation expenses and other allowable expenses pursuant to the said policy of insurance within the meaning of the policy and/or No Fault Act., and pursuant to Defendant' City Of Detroit and/or Detroit Police Department status as a self insurer.

13. That because of said injuries sustained while a passenger on Defendant's automotive coach, and subsequent thereto, Plaintiff has incurred certain medical expenses, and other allowable expenses which Defendant' City Of Detroit and/or Detroit Department of Transportation are obligated to pay under the terms of the said policy of insurance.

14. That because of said automotive coach accident, Plaintiff continues to incur medical expenses, attendant care, replacement services, wage loss, medical transportation expenses, and other allowable expenses, which Defendant Insurance is obligated to pay.

15. That although Defendant City Of Detroit and/or Detroit Department of Transportation may have paid for some of Plaintiff' expenses and losses, demand for payment of additional

compensation due Plaintiff has been made, and Defendant has further failed, neglected, and refused to pay those additional costs which continue to accrue.

16. That Defendant City Of Detroit and/or Detroit Department of Transportation has unreasonably refused to pay Plaintiff and/or has unreasonably delayed making proper payment to Plaintiff, in violation of MCLA 500.3148, and Defendant' City Of Detroit and/or Detroit Department of Transportation continues to do so.

17. That the amount in controversy, exclusive of costs, interests and attorney fees, exceeds Twenty-five Thousand Dollars (\$25,000.00).

WHEREFORE, Plaintiff herein prays that this Honorable Court grant judgment in favor of Plaintiff and against the Defendant in an amount this Honorable Court deems Plaintiff is entitled for compensatory damages, including Plaintiff' damages incurred after the filing of this Complaint, and further grant Plaintiff injunctive relief requiring Defendant to pay for those expenses incurred by Plaintiff or requiring authorization from Defendant during the pendency of this action, and in addition thereto, interest, costs, penalties and Plaintiff' actual attorney fees as provided by statute.

Respectfully submitted,

ANDREOPOULOS & HILL, PLLC

DATED: December 17, 2015

/s/ L. Louie Andreopoulos
L. LOUIE ANDREOPOULOS (P45136)
DAVID T. HILL (P48771)
Attorney for Plaintiff
28900 Woodward Avenue
Royal Oak, MI 48067
(248) 399-9991

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

JAMIE SIMPSON,

Plaintiff,

vs.

Case no. 15-_____-NF

HON. _____

THE CITY OF DETROIT,

Defendant.

L. LOUIE ANDREOPOULOS (P45136)

DAVID T. HILL (P48771)

Andreopoulos & Hill, PLLC

Attorneys for Plaintiff

28900 Woodward Avenue

Royal Oak, MI 48067

(248) 399-9991; Fax 248-399-9996

DEMAND FOR JURY TRIAL

Plaintiff, by and through his attorneys, ANDREOPOULOS & HILL, PLLC, hereby demands a trial by jury in the above-entitled action.

Respectfully submitted,

ANDREOPOULOS & HILL, PLLC

/s/ L. Louie Andreopoulos

DATED: December 17, 2015

L. LOUIE ANDREOPOULOS (P45136)

DAVID T. HILL (P48771)

Attorney for Plaintiff

28900 Woodward Avenue

Royal Oak, MI 48067

(248) 399-9991

Exhibit 6D – Letter to Plaintiff

Spinner, Ronald A.

Subject: FW: Re: JAMIE SIMPSON
Attachments: Bankruptcy Order 4-10-15.pdf; Bankruptcy Objection 2-13-15.pdf

From: Crystal Olmstead [<mailto:olmsteadc@detroitmi.gov>]
Sent: Friday, April 21, 2017 3:25 PM
To: Swanson, Marc N.
Subject: Fwd: Re: JAMIE SIMPSON

>>> Crystal Olmstead 4/12/2017 2:35 PM >>>
Fancy,

The City filed an Omnibus Objection to Certain Claims on February 13, 2015 on the basis of satisfaction of the claims. Judge Tucker entered an order on April 10, 2015 sustaining the City's objection. Jamie Simpson's claim was included in the Court's order.

As a result, the claim is deemed satisfied. I have attached copies of both referenced documents for your review. Please dismiss the circuit court matter as it is barred.

I have cc'd the City's bankruptcy counsel on this email. If I have not heard anything from you within 7 days I will consult with him. If I am forced to incur outside counsel fees, our office will seek sanctions.

/s/ Crystal B. Olmstead
Senior Assistant Corporation Counsel
City of Detroit Law Department
Coleman A. Young Municipal Building
2 Woodward Ave., 5th Floor
Detroit, Michigan 48226
Dir. Tel. 313-237-5035
Gen. Tel. 313-224-4550
Fax: 313-224-5505
olmsteadc@detroitmi.gov

WARNING: This communication may include information protected by the attorney-client privilege, the attorney work product doctrine, the deliberative process privilege, or by other privilege. This communication is intended solely for the individual or entity to whom it is addressed. If you are not the intended recipient, use of the communication is neither allowed nor intended. If you received this e-mail in error, please securely delete it.

>>> Julie Palm <julesah7806@gmail.com> 4/10/2017 2:26 PM >>>
Crystal,

I am sorry but I need to cancel this deposition scheduled for tomorrow at 10:00. Here are some dates that we are available

5/10 at 2:00
6/16 at 2:00

5/17 at 2:00

Please let me know which date is good with you so that I can get it on the calendar before the date fills up. Thank you

--

Jules

Andreopoulos & Hill, PLLC

28900 Woodward Avenue

Royal Oak, MI 48067

(248) 399-9991

Exhibit 6E – Evaluation Summary

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

JAMIE SIMPSON,

Plaintiff,

vs.

Case No.: 15-016462-NF

Hon. John H. Gillis Jr.

THE CITY OF DETROIT,

Defendant,

L. LOUIE ANDREOPOULOS (P45136)
DAVID T. HILL (P48771)
Andreopoulos & Hill, PLLC
Attorneys for Plaintiff
28900 Woodward Avenue
Royal Oak, MI 48067
(248) 399-9991; Fax: (248) 399-9996
sandhilllaw@sbcglobal.net

CRYSTAL B. OLMSTEAD (P69202)
City of Detroit Legal Department
Attorney for Defendant
Coleman A. Young Municipal Center
2 Woodward Avenue #500
Detroit, MI 48226
313-237-5035

/

PLAINTIFF'S CASE EVALUATION SUMMARY

DATE OF HEARING: May 10, 2017

TIME OF HEARING: 3:00 P.M.

I. INTRODUCTION

This is a first-party cause of action for recovery of outstanding and unpaid personal injury protection benefits arising out of the serious personal injuries sustained by Plaintiff, JAMIE SIMPSON from an accident occurring on January 3, 2013 occurring on a City of Detroit bus.

On said date, Plaintiff was a passenger on a bus operated by the City of Detroit when there was a sudden accident. The driver of another vehicle turned in front of the bus where Ms. Simpson was a passenger. (See Exhibit A- Police Report) Plaintiff has outstanding medical bills, replacement services and attendant care which Defendant has wrongfully refused to pay contrary to MCL 500.3101, et seq.

II. LIABILITY

The Defendant's contractual and statutory liability hereto cannot be reasonably contested in light of the Michigan No-Fault Insurance Act. The Defendant is liable to Plaintiff for all allowable expenses arising out of the ownership, operation, maintenance and use of a motor vehicle pursuant to MCLA 500.3105; MSA 24.13105. This liability includes the cost of all reasonable and necessary medical and rehabilitative expenses, actual wage loss, and replacement services up to \$20.00 per day for expenses incurred by Plaintiff for those services she is unable to perform for himself due to her injuries as a result of the subject accident.

Despite repeated demands, the Defendant has failed, refused and neglected to pay those amounts due Plaintiff under the No-Fault Insurance Act. The Defendant's conduct in this regard, constitutes an unreasonable refusal to pay and an unreasonable delay in making proper payments. Plaintiff, therefore, is entitled to recovery of reasonable attorney fees incurred as a result of the necessity of filing this action, pursuant to MCLA 500.3148(1); MSA 24.13148(a), and penalty interest as provided by MCLA 500.3142; MSA 24.13142, as well as statutory interest.

III. INJURIES TO PLAINTIFF – JAMIE SIMPSON

Following this accident Plaintiff was seen at Warren Chiropractic with complaints of severe pain in her right shoulder, right arm, right leg, neck, and back. Medical providers at Warren Chiropractic treated Ms. Simpson for approximately 7 months after the accident. Treatment included but was not limited to hot/cold packs, massage therapy, mechanical tractions, and other modalities all designed towards increasing range of motion while decreasing pain. Dr. John Mufarrah disabled Ms.

Simpson from doing housework and with a working assessment of her injuries she was diagnosed with cervical, lumbar, and thoracic myofascitis with mytosis associated subluxation.

V. NO-FAULT BENEFITS DUE AND OWING

A. Replacement Service for Household Chores

Due to Plaintiff's injuries, Plaintiff required replacement services since the date of the accident until present equating to 156 weeks. Plaintiff's son, Terrell Simpson provided such services including laundry, cooking, vacuuming, dusting, dish washing and other household chores. 156 weeks (x) \$140.00 per week totaling \$21,840.00.

B. Medical Related Expenses

Warren Chiropractic(See Exhibit B)	15,960.00
Misc. Medical Expenses	<u>1,500.00</u>
TOTAL MEDICAL EXPENSES	\$17,460.00

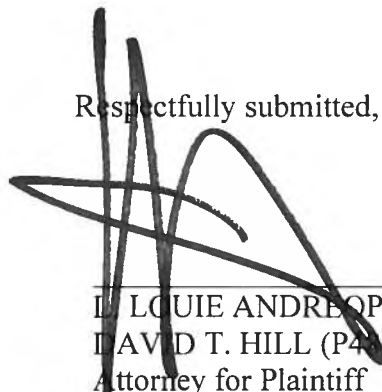
VI. NO FAULT BENEFITS LISTING

Replacement Service for Household Chores	21,840.00
Medical related expenses	<u>17,460.00</u>
TOTAL:	\$39,300.00
Penalty and statutory interest	9,432.00
Attorney fees	<u>16,244.00</u>
TOTAL:	\$64,976.00

VII. CONCLUSION AND REQUEST FOR AWARD

Plaintiff respectfully requests an award from this panel commensurate with the injuries sustained.

Respectfully submitted,



DATED: May 9, 2017

DAVID T. HILL (P45136)
DAVID T. HILL (P45771)
Attorney for Plaintiff
28900 Woodward Avenue
Royal Oak, MI 48067
(248) 399-9991

THE UNDERSIGNED CERTIFIES THAT A COPY OF THE FOREGOING INSTRUMENT WAS SERVED UPON THE ATTORNEYS OF RECORD OF ALL PARTIES TO THE ABOVE CAUSE BY MAILING OR FAXING SAME TO THEM AT THEIR RESPECTIVE ADDRESSES/FAX NUMBERS AS DISCLOSED BY THE PLEADINGS OF RECORD HEREIN, WITH POSTAGE FULLY PREPAID THEREON.

ON: May 9, 2017

EK.A

RE: JAMIE SIMPSON

Authority: 1949 PA 300, Sec.257.622
Compliance: Required MSP UD-10E
Penalty: \$100 and/or 90 days (Rev 11/2006)

External # 253859
Crash ID

Page 1
Incident # 253859 File Class :
Incident Disposition
Closed
Reviewer
LT JAMIE MCCRAE (L229)

STATE OF MICHIGAN TRAFFIC CRASH REPORT

ORI: MI8234913		Department Name Detroit Police Department	
Crash Date 01/03/2013	Crash Time 12:40	No. of Units 02	Crash Type Angle
County 82 - WAYNE	Traffic Control Signal	Relation to Roadway On Road	Special Circumstances <input type="radio"/> School Bus <input type="radio"/> Hit and Run <input type="radio"/> Deer <input type="radio"/> Fleeing Police
City/Twp 99 - DETROIT	Construction Zone (if applicable) Type	Lane Closed	Activity
Special Checks <input type="radio"/> Fatal <input type="radio"/> Non-Traffic Area <input type="radio"/> ORV/Snowmobile		Special Study Local	Weather Clear
Area 07 - NON-FRWY in Intersection		Light Daylight	Road Condition Dry
Total Lanes 02	Speed Limit 30	Posted No	

Prefix CASS	Road Name	Road Type	Suffix Divided Roadway
Distance (ft.) 1.0 Feet N	Traffic Way 01 - Not physically divided	Access Control 01 - No access control	
Prefix ANTOINETTE	Intersecting Road	Road Type	Suffix Divided Roadway

Unit Number 01	Unit Known Yes	State MI	Driver License Number (269) [REDACTED]	Date of Birth (Age) (46)	License Type <input type="radio"/> Operator <input type="radio"/> Chauffeur <input type="radio"/> Moped	Endorsements <input type="radio"/> Cycle <input type="radio"/> Farm <input type="radio"/> Recreation	Sex M	Total Occupants 03	Hazardous Action 09 - Improper turn
Unit Type MV	Driver Information JOHN ROSS CAMPBELL SPRINGFIELD MI 49037			Injury C	Position 01	Restraint 04	Hospital None		
Driver Condition <input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8 <input type="radio"/> 9 <input type="radio"/> 99				Interlock No	Ejected	Trapped	Airbag Deployed No	Ambulance None	
Alcohol <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Refused <input type="radio"/> OPBT <input type="radio"/> Not Offered <input type="radio"/> Breath <input type="radio"/> Blood <input type="radio"/> Urine				Test Results		Drugs <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Blood <input type="radio"/> Urine	Test Results		Citation Issued <input type="radio"/> Hazardous <input type="radio"/> Other
Vehicle Registration BXA6762		State MI	Insurance/Policy # UNK	Towed To/By # N/A		Special Vehicles	Private Trailer Type	Vehicle Defect	
VIN 1FAPF55S04G155986	Vehicle Description FORD	Make TAURUS	Model	Color GLD	Year 2004	Vehicle Type Passenger Car			
Location of Greatest Damage 03	First Impact 03	Extent of Damage 04	Driveable No	Vehicle Direction W	Vehicle Use 01 - Private	Action Prior 03 - Turning right			
Sequence of Events First		Second		Third		Fourth			
(* Indicates MOST harmful event) • 17 - Motor veh in transport									

PASSENGERS	Passenger Information JOSH HANCOCK BATTLE CREEK MI 49014 (269) [REDACTED]			Date of Birth (Age) (32)	Sex M	Position 03	Restraint 04	Hospital None
	Injury C			Airbag Deployed No	Ejected	Trapped	Ambulance None	
	Passenger Information FRANCIS NEILSON PARCHMOUNT MI 49004 (269) [REDACTED]			Date of Birth (Age) (31)	Sex F	Position 09	Restraint 09	Hospital None
	Injury C			Airbag Deployed No	Ejected	Trapped	Ambulance None	
	Passenger Information			Date of Birth (Age)	Sex	Position	Restraint	Hospital
	Injury			Airbag Deployed	Ejected	Trapped	Ambulance	
	Passenger Information			Date of Birth (Age)	Sex	Position	Restraint	Hospital
	Injury			Airbag Deployed	Ejected	Trapped	Ambulance	
	Passenger Information			Date of Birth (Age)	Sex	Position	Restraint	Hospital
	Injury			Airbag Deployed	Ejected	Trapped	Ambulance	

Carrier Information				Carrier Source GVWR	ICCMC	USDOT	MPSC
Driver's CDL Type OH OP OT ON OS OX				Endorsements OH OP OT ON OS OX	CDL Exempt OFarm OOther	CDL Restrictions 028 029 030 035 036	
Interstate/Intrastate	Vehicle Type	Type and Axle Per Unit First Second Third Fourth	Cargo Body Type	Medical Card	Hazardous Material OPicard OCargo Split	ID #	Class #

Owner Information	Owner Information
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Person Advised of Damaged Traffic Control Contact Name : Contact Date : Contact Time :	Damaged Property Owner and Phone	Public
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Unit Number 02	Unit Known Yes	State MI	Driver License Number [REDACTED]	Date of Birth(Age) [REDACTED] (45)	License Type <input type="radio"/> Operator <input checked="" type="radio"/> Chauffeur <input type="radio"/> Moped	Endorsements <input type="radio"/> Cycle <input type="radio"/> Farm <input type="radio"/> Recreation	Sex M	Total Occupants 12	Hazardous Action 00 - None
Driver Information ERIC DARREN JONES					Injury O	Position 01	Restraint 04	Hospital None	
MV DETROIT MI 48207 (313 [REDACTED])									
Driver Condition <input checked="" type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8 <input type="radio"/> 9 <input type="radio"/> 99				Interlock No	Ejected No	Trapped No	Airbag Deployed No	Ambulance None	
Alcohol <input checked="" type="radio"/> Yes <input type="radio"/> No Test Type <input type="radio"/> Field <input type="radio"/> OPBT					Test Results <input type="radio"/> Not Offered <input type="radio"/> Breath <input type="radio"/> Blood <input type="radio"/> Urine		Test Results <input type="radio"/> No <input type="radio"/> Blood <input type="radio"/> Urine		Citation Issued <input type="radio"/> Hazardous <input type="radio"/> Other
Vehicle Registration 082X846		State MI	Insurance/Policy # CITY OF DETROIT		Towed To/By #		Special Vehicles 3	Private Trailer Type	Vehicle Defect
VIN 5FYD4FV155C027730		Vehicle Description NEW FLYER	Make D40LF	Model WHI	Color 2005	Year Truck/Bus			
Location of Greatest Damage 08		First Impact 02	Extent of Damage Yes	Driveable S	Vehicle Direction 02 - Commercial	Vehicle Use 01 - Going Straight Ahead	Action Prior		
Sequence of Events First					Second		Third		Fourth
(* Indicates MOST harmful event) • 17 - Motor veh in transport									

PASSENGERS	Passenger Information CHRISTIAN EDWARD				Date of Birth (Age) [REDACTED] (19)	Sex F	Position 11	Restraint 01	Hospital 830500
	DETROIT MI 48227 (313 [REDACTED])				Injury B	Airbag Deployed Not equipped	Ejected Trapped	Ambulance 821064	
	Passenger Information RESHAWN HARRIS				Date of Birth (Age) [REDACTED] (42)	Sex M	Position 11	Restraint 01	Hospital None
	DETROIT MI 48201 (313 [REDACTED])				Injury C	Airbag Deployed Not equipped	Ejected Trapped	Ambulance None	
	Passenger Information ANTOINETTE HUEY				Date of Birth (Age) [REDACTED] (48)	Sex F	Position 11	Restraint 01	Hospital None
	DETROIT MI 48202 (313 [REDACTED])				Injury C	Airbag Deployed Not equipped	Ejected Trapped	Ambulance None	
	Passenger Information LEE ELLA GRAYSON				Date of Birth (Age) [REDACTED] (71)	Sex F	Position 11	Restraint 01	Hospital None
DETROIT MI 48201 (313 [REDACTED])				Injury C	Airbag Deployed Not equipped	Ejected Trapped	Ambulance None		
Passenger Information PRINCESS TILLMAN				Date of Birth (Age) [REDACTED] (39)	Sex F	Position 11	Restraint 01	Hospital None	
DETROIT MI 48221 (313 [REDACTED])				Injury C	Airbag Deployed Not equipped	Ejected Trapped	Ambulance None		
Passenger Information WILLIAM STRAUGHTER				Date of Birth (Age) [REDACTED] (39)	Sex M	Position 11	Restraint 01	Hospital None	
DETROIT MI 48238 (313 [REDACTED])				Injury C	Airbag Deployed Not equipped	Ejected Trapped	Ambulance None		

Carrier Information DETROIT DOT				Carrier Source Vehicle	GWR 40,600	ICCMC	USDOT 000000000000	MPSC 000000000000
1301 E WARREN				Driver's CDL Type Group A	Endorsements <input checked="" type="radio"/> P <input type="radio"/> T <input type="radio"/> S <input type="radio"/> X	CDL Exempt <input type="radio"/> Farm <input type="radio"/> Other	CDL Restrictions <input type="radio"/> 028 <input type="radio"/> 029 <input type="radio"/> 030 <input type="radio"/> 035 <input type="radio"/> 036	
DETROIT MI 48207				Cargo Body Type 8	Medical Card Yes	Hazardous Material <input type="radio"/> Placard <input type="radio"/> Cargo Spill	ID #	Class #
Interstate/Intrastate Interstate	Vehicle Type AP	Type and Axle Per Unit First B2 Second Third Fourth						

Owner Information	Owner Information

Witness Information	Witness Information

Investigated at Scene Yes	Reported Date (Time) 01/03/2013 (12:47)	1st Investigator Name (Badge) Off. MATTHEW SINGER (483)	2nd Investigator Name (Badge)	Photo By
-------------------------------------	---	---	-------------------------------	----------

Narrative

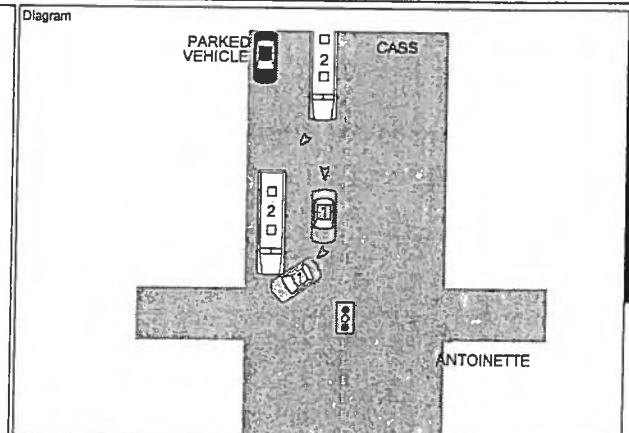
DRIVER2 CITY OF DETROIT BUS #4187

DRIVER1 STATED DRIVER2 HAD BEEN TRYING TO PASS HIM. DRIVER1 STATED HE WAS MAKING A RIGHT TURN AND WAS UNSURE HOW DRIVER2 WAS ON HIS RIGHT SIDE AND CONTACT WAS MADE. DRIVER2 STATED DRIVER1 WAS COMING TO A STOP AT A GREEN TRAFFIC SIGNAL THEN MADE RIGHT TURN IN FRONT OF HIM AND CONTACT WAS MADE.

DRIVER1 COMPLAINED OF HEAD INJURY. EMS REFUSED. DRIVER1 PASSENGER1 COMPLAINED OF HEAD INJURY. EMS REFUSED. DRIVER1 PASSENGER2 COMPLAINED OF NECK INJURY. EMS REFUSED. DRIVER2 PASSENGER1 COMPLAINED OF RIGHT KNEE INJURY AND CONVEYED TO [REDACTED] BY MED8. [REDACTED] CONDITION PER DR. [REDACTED] CHART # [REDACTED]

FOLLOWING DRIVER2 PASSENGERS INJURED AND REFUSED EMS. PASSENGER2 RIGHT SHOULDER. PASSENGER3 BOTH KNEES. PASSENGER4 RIGHT LEG AND HEAD. PASSENGER5 BACK INJURY.

External #: 253859
Incident #: 253859



STATE OF MICHIGAN TRAFFIC CRASH REPORT

ORI:		Department Name		Reviewer	
Crash Date	Crash Time	No. of Units	Crash Type	Special Circumstances	Special Checks
County	Traffic Control	Relation to Roadway	Special Study	School Bus None Hit and Run Deer Fleeing Police	Fatal Non-Traffic Area ORV/Snowmobile
City/Twsp	Construction Zone (if applicable) Type	Lane Closed	Activity	Light	Road Condition
					Total Lanes
					Speed Limit
					Posted

Prefix	Road Name	Road Type	Suffix	Divided Roadway
Distance (ft.)	Traffic Way		Access Control	
Prefix	Intersecting Road	Road Type	Suffix	Divided Roadway

Unit Number	Unit Known	State	Driver License Number	Date of Birth (Age)	License Type	Endorsements	Sex	Total Occupants	Hazardous Action
02					Operator Chauffeur Moped	Cycle Farm Recreation			
Unit Type	Driver Information			Injury	Position	Restraint	Hospital		
Driver Condition				Interlock	Ejected	Trapped	Airbag Deployed	Ambulance	
Alcohol				Test Results		Drugs		Citation issued	
Yes Test Type				No Field Refused PBT Not Offered Breath Blood Urine		Yes Test Type		No Blood Urine	
Vehicle Registration		State	Insurance/Policy #	Towed To/By #		Special Vehicles		Private Trailer Type	Vehicle Defect
VIN		Vehicle Description		Make	Model	Color	Year	Vehicle Type	
Location of Greatest Damage		First Impact	Extent of Damage	Driveable	Vehicle Direction	Vehicle Use	Action Prior		
Sequence of Events		First	Second	Third	Fourth				
(• Indicates MOST harmful event)									

Passenger Information	Date of Birth (Age)	Sex	Position	Restraint	Hospital
KENNETH GOODMAN	(51)	M	11	01	None
DETROIT MI 48221 (313)					
Passenger Information	Date of Birth (Age)	Sex	Position	Restraint	Hospital
DESHON SESSION	(23)	M	11	01	None
DETROIT MI 48206 (313)					
Passenger Information	Date of Birth (Age)	Sex	Position	Restraint	Hospital
WILLIE WHITTIS	(77)	M	11	01	None
DETROIT MI 48238 (313)					
Passenger Information	Date of Birth (Age)	Sex	Position	Restraint	Hospital
JAMIE SIMPSON	(53)	M	11	01	None
DETROIT MI 48214 (313)					
Passenger Information	Date of Birth (Age)	Sex	Position	Restraint	Hospital
MARY MILLINER	(46)	M	11	01	None
DETROIT MI 48206 (58)					
Passenger Information	Date of Birth (Age)	Sex	Position	Restraint	Hospital

Carrier Information		Carrier Source	GVWR	ICCMC	USDOT	MPSC
Driver's CDL Type		Endorsements	CDL Exempt	CDL Restrictions		
		H P T N S X	Farm Other	28 29 30 35 36		
Interstate/Intrastate	Vehicle Type	Type and Axle Per Unit	Third	Fourth	Cargo Body Type	Medical Card
		First				Hazardous Material
						Placard Cargo Spill
						ID # Class #

Owner Information	Owner Information

Person Advised of Damaged Traffic Control	Damaged Property	Public
Contact Name :		
Contact Date :		
Contact Time :		
	Owner and Phone	

Unit Number		Unit Known		State		Driver License Number		Date of Birth(Age)		License Type <input type="checkbox"/> Operator <input type="checkbox"/> Chauffeur <input type="checkbox"/> Moped		Endorsements <input type="checkbox"/> Cycle <input type="checkbox"/> Farm <input type="checkbox"/> Recreation		Sex		Total Occupants		Hazardous Action									
Unit Type		Driver Information								Injury		Position		Restraint		Hospital											
Driver Condition <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 99										Interlock		Ejected		Trapped		Airbag Deployed		Ambulance									
Alcohol Yes Test Type		No Field		Refused PBT		Not Offered Breath		Blood		Urine		Test Results		Drugs Yes Test Type		No Blood		Urine		Test Results		Citation Issued Hazardous		Other			
Vehicle Registration		State		Insurance/Policy #								Towed To/By #								Special Vehicles/Private Trailer Type		Vehicle Defect					
VIN				Vehicle Description				Make				Model				Color				Year				Vehicle Type			
Location of Greatest Damage				First Impact				Extent of Damage				Driveable				Vehicle Direction				Vehicle Use				Action Prior			
Sequence of Events				First				Second				Third				Fourth											
(● Indicates MOST harmful event)																											

PASSENGERS	Passenger Information				Date of Birth (Age)		Sex		Position		Restraint		Hospital	
					Injury		Airbag Deployed		Ejected		Trapped		Ambulance	
	Passenger Information				Date of Birth (Age)		Sex		Position		Restraint		Hospital	
					Injury		Airbag Deployed		Ejected		Trapped		Ambulance	
	Passenger Information				Date of Birth (Age)		Sex		Position		Restraint		Hospital	
					Injury		Airbag Deployed		Ejected		Trapped		Ambulance	
PASSENGERS	Passenger Information				Date of Birth (Age)		Sex		Position		Restraint		Hospital	
					Injury		Airbag Deployed		Ejected		Trapped		Ambulance	
	Passenger Information				Date of Birth (Age)		Sex		Position		Restraint		Hospital	
					Injury		Airbag Deployed		Ejected		Trapped		Ambulance	
	Passenger Information				Date of Birth (Age)		Sex		Position		Restraint		Hospital	
					Injury		Airbag Deployed		Ejected		Trapped		Ambulance	
PASSENGERS	Passenger Information				Date of Birth (Age)		Sex		Position		Restraint		Hospital	
					Injury		Airbag Deployed		Ejected		Trapped		Ambulance	
	Passenger Information				Date of Birth (Age)		Sex		Position		Restraint		Hospital	
					Injury		Airbag Deployed		Ejected		Trapped		Ambulance	
	Passenger Information				Date of Birth (Age)		Sex		Position		Restraint		Hospital	
					Injury		Airbag Deployed		Ejected		Trapped		Ambulance	

Carrier Information				Carrier Source		GVWR		ICCMC		USDOT		MPSC	
				Driver's CDL Type		Endorsements <input type="checkbox"/> H <input type="checkbox"/> P <input type="checkbox"/> T <input type="checkbox"/> N <input type="checkbox"/> S <input type="checkbox"/> X		CDL Exempt <input type="checkbox"/> Farm <input type="checkbox"/> Other		CDL Restrictions <input type="checkbox"/> 28 <input type="checkbox"/> 29 <input type="checkbox"/> 30 <input type="checkbox"/> 35 <input type="checkbox"/> 38			
Interstate/Intrastate		Vehicle Type		Type and Axle Per Unit First Second Third Fourth		Cargo Body Type		Medical Card		Hazardous Material <input type="checkbox"/> Placard <input type="checkbox"/> Cargo Spill		ID # Class #	

OWNER	Owner Information				Owner Information				
WITNESS	Witness Information				Witness Information				
Investigated at Scene.		Reported Date (Time)		1st Investigator Name (Badge)		2nd Investigator Name (Badge)		Photo By	
Narrative						Diagram			
External #: 253859 Incident #: 253859									

253859

External # 253859
Incident # 253859

Continued Narrative

PASSENGER6 BACK AND RIGHT ARM. PASSENGER7 RIGHT HAND. PASSENGER8 HEAD. PASSENGER9 LEFT WRIST BACK NECK AND HEAD.
PASSENGER10 RIGHT WRIST AND KNEE. PASSENGER11 RIGHT SHOULDER.
DRIVER1 VEH PRIVATE TOW

EX.B

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JAMIE SIMPSON

DETROIT, MI 48214

Chart Number

SIMJA000

Date	Document	Description	Case Number	Amount
Date of Last Payment:		Amount:	0.00	
Patient: JAMIE SIMPSON		Chart #: SIMJA000	Case Description: BUS ACCIDENT	
1/18/2013	1308290000	OFFICE VISIT (NEW PATIENT)	2921	150.00
1/18/2013	1308290000	CERV AP-LAT (2-3 views)	2921	100.00
1/18/2013	1308290000	THORACIC AP/LAT	2921	150.00
1/18/2013	1308290000	LUMBAR AP/LAT (2-3 views)	2921	150.00
1/23/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
1/23/2013	1308290000	MASSAGE THERAPY	2921	55.00
1/23/2013	1308290000	MECHANICAL TRACTION	2921	55.00
1/23/2013	1308290000	HOT/COLD PACKS	2921	45.00
1/25/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
1/25/2013	1308290000	MASSAGE THERAPY	2921	55.00
1/25/2013	1308290000	MECHANICAL TRACTION	2921	55.00
1/25/2013	1308290000	HOT/COLD PACKS	2921	45.00
1/28/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
1/28/2013	1308290000	MASSAGE THERAPY	2921	55.00
1/28/2013	1308290000	MECHANICAL TRACTION	2921	55.00
1/28/2013	1308290000	HOT/COLD PACKS	2921	45.00
1/30/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
1/30/2013	1308290000	MASSAGE THERAPY	2921	55.00
1/30/2013	1308290000	MECHANICAL TRACTION	2921	55.00
1/30/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/2/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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JAMIE SIMPSON

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SIMJA000

Date	Document	Description	Case Number	Amount
2/2/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/2/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/2/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/4/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/4/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/4/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/4/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/6/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/6/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/6/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/6/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/8/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/8/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/8/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/8/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/11/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/11/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/11/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/11/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/13/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/13/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/13/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/13/2013	1308290000	HOT/COLD PACKS	2921	45.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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JAMIE SIMPSON

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Date	Document	Description	Case Number	Amount
2/15/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/15/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/15/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/15/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/18/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/18/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/18/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/18/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/20/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/20/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/20/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/20/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/22/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/22/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/22/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/22/2013	1308290000	HOT/COLD PACKS	2921	45.00
2/27/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
2/27/2013	1308290000	MASSAGE THERAPY	2921	55.00
2/27/2013	1308290000	MECHANICAL TRACTION	2921	55.00
2/27/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/1/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/1/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/1/2013	1308290000	MECHANICAL TRACTION	2921	55.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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JAMIE SIMPSON

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Chart Number
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Date	Document	Description	Case Number	Amount
3/1/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/4/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/4/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/4/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/4/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/6/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/6/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/6/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/6/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/8/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/8/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/8/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/8/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/13/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/13/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/13/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/13/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/15/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/15/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/15/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/15/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/20/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/20/2013	1308290000	MASSAGE THERAPY	2921	55.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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JAMIE SIMPSON

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Chart Number

SIMJA000

Date	Document	Description	Case Number	Amount
3/20/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/20/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/22/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/22/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/22/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/22/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/27/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/27/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/27/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/27/2013	1308290000	HOT/COLD PACKS	2921	45.00
3/29/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
3/29/2013	1308290000	MASSAGE THERAPY	2921	55.00
3/29/2013	1308290000	MECHANICAL TRACTION	2921	55.00
3/29/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/3/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/3/2013	1308290000	MASSAGE THERAPY	2921	55.00
4/3/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/3/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/6/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/6/2013	1308290000	MASSAGE THERAPY	2921	55.00
4/6/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/6/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/8/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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JAMIE SIMPSON
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Chart Number
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Date	Document	Description	Case Number	Amount
4/8/2013	1308290000	MASSAGE THERAPY	2921	55.00
4/8/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/8/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/10/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/10/2013	1308290000	MASSAGE THERAPY	2921	55.00
4/10/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/10/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/12/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/12/2013	1308290000	MASSAGE THERAPY	2921	55.00
4/12/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/12/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/17/2013	1308290000	10 MIN OV (FOCUSED) established patient	2921	50.00
4/17/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/17/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/17/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
4/17/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/19/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/19/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/19/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
4/19/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/22/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/22/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/22/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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JAMIE SIMPSON
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Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
4/22/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/26/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/26/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/26/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
4/26/2013	1308290000	HOT/COLD PACKS	2921	45.00
4/29/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
4/29/2013	1308290000	MECHANICAL TRACTION	2921	55.00
4/29/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
4/29/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/2/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/2/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/2/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/2/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/3/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/3/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/3/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/3/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/6/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/6/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/6/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/6/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/8/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/8/2013	1308290000	MECHANICAL TRACTION	2921	55.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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JAMIE SIMPSON

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Chart Number

SIMJA000

Date	Document	Description	Case Number	Amount
5/8/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/8/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/13/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/13/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/13/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/13/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/15/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/15/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/20/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT.	2921	75.00
5/20/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/20/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/20/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/22/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/22/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/22/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/22/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/24/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/24/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/24/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
5/24/2013	1308290000	HOT/COLD PACKS	2921	45.00
5/29/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
5/29/2013	1308290000	MECHANICAL TRACTION	2921	55.00
5/29/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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SIMJA000

Date	Document	Description	Case Number	Amount
5/29/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/3/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/3/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/3/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/3/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/7/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/7/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/7/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/7/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/10/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/10/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/10/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/10/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/14/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/14/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/14/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/14/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/17/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/17/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/17/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/17/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/21/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/21/2013	1308290000	MECHANICAL TRACTION	2921	55.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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JAMIE SIMPSON
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SIMJA000

Date	Document	Description	Case Number	Amount
6/21/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/21/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/26/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/26/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/26/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/26/2013	1308290000	HOT/COLD PACKS	2921	45.00
6/28/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
6/28/2013	1308290000	MECHANICAL TRACTION	2921	55.00
6/28/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
6/28/2013	1308290000	HOT/COLD PACKS	2921	45.00
7/1/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
7/1/2013	1308290000	MECHANICAL TRACTION	2921	55.00
7/1/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
7/1/2013	1308290000	HOT/COLD PACKS	2921	45.00
7/10/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
7/10/2013	1308290000	MECHANICAL TRACTION	2921	55.00
7/10/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
7/10/2013	1308290000	HOT/COLD PACKS	2921	45.00
7/12/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
7/12/2013	1308290000	MECHANICAL TRACTION	2921	55.00
7/12/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
7/12/2013	1308290000	HOT/COLD PACKS	2921	45.00
7/18/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

WARREN CHIROPRACTIC & REHAB
19201 W. WARREN
DETROIT, MI 48228
(313)240-7950

Statement Date
9/13/2013

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JAMIE SIMPSON
[REDACTED]
DETROIT, MI 48214

Chart Number
SIMJA000

Date	Document	Description	Case Number	Amount
7/18/2013	1308290000	MECHANICAL TRACTION	2921	55.00
7/18/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
7/18/2013	1308290000	HOT/COLD PACKS	2921	45.00
7/19/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
7/19/2013	1308290000	MECHANICAL TRACTION	2921	55.00
7/19/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
7/19/2013	1308290000	HOT/COLD PACKS	2921	45.00
7/26/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
7/26/2013	1308290000	MECHANICAL TRACTION	2921	55.00
7/26/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
7/26/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/1/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/1/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/1/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/1/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/2/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/2/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/2/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/2/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/7/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/7/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/7/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/7/2013	1308290000	HOT/COLD PACKS	2921	45.00

Total Charges	Total Payments	Total Adjustments	Balance Due
Continued	Continued	Continued	\$ 15,960.00

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(313)240-7950

Statement Date

9/13/2013

Page

12

JAMIE SIMPSON

DETROIT, MI 48214

Chart Number

SIMJA000

Date	Document	Description	Case Number	Amount
8/12/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/12/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/12/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/12/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/15/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/15/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/15/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/15/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/20/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/20/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/20/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/20/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/21/2013	1308290000	10 MIN OV (FOCUSED) established patient	2921	50.00
8/21/2013	1308290000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/21/2013	1308290000	MECHANICAL TRACTION	2921	55.00
8/21/2013	1308290000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/21/2013	1308290000	HOT/COLD PACKS	2921	45.00
8/31/2013	1309130000	MANIPULATIONS (3-4 AREA) CMT	2921	75.00
8/31/2013	1309130000	MECHANICAL TRACTION	2921	55.00
8/31/2013	1309130000	THERAPEUTIC EXERCISE 15 MIN	2921	55.00
8/31/2013	1309130000	HOT/COLD PACKS	2921	45.00

Total Charges	Total Payments	Total Adjustments	Balance Due
\$15960.00	\$0.00	\$0.00	\$ 15,960.00

Exhibit 6F – Excerpt of Transcript of March 22, 2017, Hearing

1 UNITED STATES BANKRUPTCY COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION

3 IN THE MATTER OF, Case No. 13-53846
4 CITY OF DETROIT, MICHIGAN Detroit, Michigan
March 22, 2017
1:48 p.m.

5
6 IN RE: [#11743] CORRECTED MOTION TO FILE AMENDED PROOF OF
7 CLAIM, FILED BY INTERESTED PARTY JEROME COLLINS, [#11357]
8 MOTION TO ENFORCE ORDER, PURSUANT TO SECTIONS 105, 501, AND
9 503 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND
10 3003(c), ESTABLISHING BAR DATES FOR FILING OF PROOFS OF CLAIM
11 AND APPROVING FORM AND MANNER OF NOTICE THEREOF AGAINST DANNY
12 CROWELL, LEOTA MURPHY, AND JASMINE CROWELL, FILED BY DEBTOR IN
13 POSSESSION CITY OF DETROIT, MICHIGAN, AND [#11583] MOTION TO
14 ENFORCE ORDER, PURSUANT TO SECTIONS 105, 501 and 503 OF THE
15 BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND 3003(c),
16 ESTABLISHING BAR DATES FOR FILING OF PROOFS OF CLAIM AND
17 APPROVING FORM AND MANNER OF NOTICE THEREOF AGAINST NAJIB
18 HODGE, FILED BY DEBTOR IN POSSESSION CITY OF DETROIT, MICHIGAN
19 BEFORE THE HONORABLE THOMAS J. TUCKER
20 TRANSCRIPT ORDERED BY: ROBIN WYSOCKI

21 APPEARANCES:

22 For the City of Detroit: MARC SWANSON, ESQ. (P71149)
23 Miller, Canfield, Paddock &
24 Stone
25 150 West Jefferson
Suite 2500
Detroit, MI 48226
313-496-7829

For Creditors Crowell, JOSEPH DEDVUKAJ, ESQ. (P51335)
Murphy and Crowell: The Joseph Dedvukaj Firm, P.C.
1277 West Square Lake Road
Bloomfield Hills, MI 48302
248-352-2110

For Creditor Najib Hodge: CLIFFORD NEUBAUER, JR., ESQ.
(P70910)
The Law Office of Joumana
Kayrouz, PLLC
1000 Town Center
Suite 800
Southfield, MI 48075
248-557-3645

1 For Jerome Collins: BENJAMIN WHITFIELD, ESQ.
2 (P23562)
3 Benjamin Whitfield, Jr. and
4 Associates
5 613 Abbott Street
6 1st Floor
7 Detroit, MI 48226
8 313-961-1000

9 Court Recorder: Jamie Laskaska

10 Transcriber: Deborah L. Kremlick

11 Proceedings recorded by electronic sound recording, transcript
12 produced by transcription service.
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1 actually granted that motion, allowed him to file his brief.
2 He devoted two sentences to this post-petition argument and
3 the city does not feel that the plaintiffs here should be
4 allowed to further supplement briefing on that issue. They
5 had sufficient amount of time and the Court even afforded them
6 an opportunity to address it here today and -- and nothing
7 further was -- was put into evidence. Unless the Court has
8 any further questions, the city respectfully requests that the
9 Court grant its two motions.

10 THE COURT: All right. Thank you. Thank you all.

11 I'm going to rule on these motions now and explain my
12 ruling here. Hopefully briefly but we'll see.

13 The two motions that are before me now filed by the city,
14 both involve relief that the city seeks against parties who
15 have filed and have pending and unless barred or enjoined by
16 this Court apparently will continue to try to prosecute
17 lawsuits filed that they filed in the Wayne County Circuit
18 Court against the City of Detroit seeking relief including
19 monetary relief for -- arising from accidents relating to
20 motor vehicles owned or operated by the city or city employees
21 in the course of their performance of their duties allegedly
22 that occurred before the filing of the City of Detroit's
23 bankruptcy case.

24 The bankruptcy case petition was filed July 18, 2013.

1 which is docket 11583, I'll call that the Hodge motion just
2 for short. The -- it's undisputed that the lawsuit, the
3 accident occurred in 2012 involved an injury suffered by -- or
4 injuries allegedly suffered by Najib Hodge while riding on a
5 -- a City of Detroit bus that occurred in 2012, well before
6 the bankruptcy case was filed.

7 And Najib Hodge has not argued and does -- that the --
8 her claim, or his or her claim or claims against the city that
9 arise from that 2012 accident are anything but pre-petition
10 claims. That is claims that arose before the filing of the
11 City of Detroit's bankruptcy petition on July 18, 2013.

12 The other motion, docket 11357 which I'll refer to as the
13 Crowell motion just for shorthand, concerns a lawsuit filed --
14 or lawsuit or lawsuits filed in the Wayne County Circuit Court
15 by Danny Crowell, Leota Murphy, and Jasmine Crowell, all three
16 of whom were in a vehicle that was struck by a truck being
17 operated by a City of Detroit employee that occurred in June
18 2013 roughly a month and a half before the city filed its
19 bankruptcy petition in this case.

20 Now with respect to the claims filed in the Wayne County
21 Circuit Court action or actions by Crowell, Murphy, and
22 Crowell, there was an argument made in the Crowell
23 respondent's written response originally to the city's motion
24 before me today and also touched on or argued a bit in the

1 motions. An argument that the claims of those individuals,
2 Crowell, Crowell, and Murphy should be viewed as post-petition
3 claims at least in part, claims that arose after -- arose
4 after the bankruptcy petition date in the Detroit's case
5 rather than before it.

6 The theory there was that the claims or at least to the
7 extent the claims were so-called third party claims under
8 Michigan's no fault statute, claims based upon Michigan
9 Compiled Laws Annotated Section 500.3135-1 and also 5 of that
10 statute, those claims arose after the petition date.

11 The argument as I understand it was this. The -- because
12 Section 500.3135-1 concerns a claim, a tort liability claim
13 for non-economic loss for injured persons who among other
14 things have suffered, "serious impairment of body function", a
15 phrase which is defined specifically in Michigan Compiled Laws
16 Section 500.3135-5 currently to mean, "an objectively
17 manifested impairment of an important body function that
18 affects the person's general ability to lead his or her normal
19 life."

20 That that claim did not arise until long after the July
21 2013 bankruptcy petition date even though the accident in
22 question occurred a month and a half before that date.
23 Because the claimants, Crowell, Crowell, and Murphy did not
24 have serious impairment of body function within the meaning of

1 Section 500.3135-1 and 5 until approximately May 2016, long
2 after the city's bankruptcy petition was filed.

3 And therefore the claim did not arise for purposes of the
4 Bankruptcy Code and -- and this issue of whether it was a
5 pre-petition or a post-petition claim until long after the
6 petition date.

7 During the November 16, 2016 hearing, the Court had
8 discussion with counsel for Crowell, Crowell, and Murphy who's
9 here again today for this second hearing and has argued both
10 times for them. And the Court asked, well, what evidence is
11 there that the claim, that the serious impairment of body
12 function as defined in the Michigan statute that I've --
13 statutes that I've cited only arose in May 2016 or only arose
14 long pre -- post-petition here instead of arising pre-petition
15 given that the -- the truck accident happened a month and a
16 half pre-petition.

17 Counsel for Crowell, Crowell, and Murphy acknowledged on
18 the record in the November 16 hearing and -- and the
19 transcript by the way of -- of that hearing is on file in this
20 case at docket 11685. It's a long transcript, but the part of
21 the hearing that day that concerned these two motions is --
22 begins on Page 95 of that transcript.

23 In any case, counsel for Crowell, Crowell, and Murphy
24 acknowledged that at least up to that point there was no

25 evidence in the record, he had presented no evidence to

1 support his claim that the so-called third party claim that
2 I've alluded to here did not arise until May 2016, or did not
3 arise post-petition for that matter.

4 I asked counsel to tell me what evidence -- what the
5 evidence would show if he were given an opportunity to present
6 some evidence on that subject. And then I ended up giving
7 counsel for Crowell, Crowell, and Murphy, an opportunity, and
8 in fact quite a long period of time to file a supplement to
9 his response to the city's motion to present any such
10 evidence.

11 And I also made clear in the hearing and -- and also in
12 the ensuing order that I entered November 18 in a footnote,
13 that the Court was -- was going to apply the so-called fair
14 contemplation test that I described in the -- a prior written
15 opinion of mine in this case to determine whether the claim
16 was -- and to what extent the claim was pre-petition versus
17 post-petition.

18 And so I -- as I said in the hearing and also as I said
19 in the order that I entered on November 18, 2016 at docket
20 11679, Paragraph 2 and the Footnote 1 of that order, Crowell,
21 Crowell, and Murphy were given until January 25, 2017 to file
22 a supplemental brief and any exhibits containing any
23 evidentiary material, including affidavits or documentary
24 evidence in support of their argument that the claims against
25 the city arose after the city filed its bankruptcy petition

1 rather than before.

2 Now that was the deadline counsel for Crowell, Crowell,
3 and Murphy asked the Court for. It was a date that was more
4 than two months after the November 16 hearing and after the
5 November 18 order.

6 And the Crowell, Crowell, and Murphy never filed and the
7 supplement that they did file never included in that
8 supplement any exhibits containing any evidentiary material,
9 no affidavits, no documentary evidence, including no such
10 evidence of the type that counsel for Crowell, Crowell, and
11 Murphy said on the record during the November 16 hearing that
12 he could and would present if given an opportunity to do so.

13 And while it was -- there was a supplemental brief filed
14 by Crowell, Crowell, and Murphy, for the record it's on file
15 at docket 11803, that brief really ads no facts whatsoever to
16 support this claim of -- of these individuals having a
17 post-petition claim. It merely repeats in one or two
18 sentences in the brief the general conclusory argument that
19 had already been made in writing and during the November 16
20 hearing.

21 So it really ads nothing whatsoever to support Crowell,
22 Crowell, and Murphy's argument that they have in any respect a
23 post-petition claim as opposed to a pre-petition claim with
24 respect to these -- these so-called third party tort claims
25 that were -- that are at issue.

1 Now it is true that counsel for Crowell, Crowell, and
2 Murphy had some difficulties in getting the supplemental brief
3 and exhibits that were ultimately filed, validly filed given
4 their counsel's delay in getting himself trained so that he
5 could file documents and pleadings electronically in this
6 Bankruptcy Court.

7 Initially the -- back in November there was paper
8 responses filed or sought to be filed. The Court ended up
9 striking some of the filings for reasons stated by the Court
10 in its order striking them.

11 And -- and the supplement that was initially sought to be
12 filed back in November was ultimately filed successfully with
13 the Court's permission on March 6, 2017 at docket 11803. And
14 that was filed electronically.

15 Now that filing included everything, brief and exhibits
16 that counsel for Crowell, Crowell, and Murphy had sought to
17 file earlier, including by the January 25, 2017 deadline set
18 by the Court's November 18 order. And as I said it included
19 no evidence of any kind, no evidentiary materials of any kind
20 tending to support or having anything to do with the issue of
21 whether or not there is a -- this is in any part a
22 post-petition claim in this case.

23 The Court finds that counsel for these parties and these
24 parties Crowell, Crowell, and Murphy have had ample

1 support or evidentiary materials they want to present in
2 support of their argument that they did not have a claim for
3 -- a tort claim under Michigan Compiled Laws Section
4 500.3135-1 against the City of Detroit until after the filing
5 of the bankruptcy petition, even though the -- it's undisputed
6 that the truck accident from which all of their injuries,
7 alleged injuries and damages arise and arose occurred a month
8 and a half before the bankruptcy petition date.

9 And so the same situation that existed on November 16 in
10 the -- in the first hearing exists now in the sense that there
11 is no evidence whatsoever presented by Crowell, Crowell, and
12 Murphy to support their argument that they have any claim
13 against the City of Detroit that arose after the filing of the
14 bankruptcy petition.

15 Under of course the existence of a claim, that is a claim
16 that meets all of the elements under state law to have a valid
17 claim for this type of third party claim, is not determinative
18 in any event, even if all the elements did not exist until
19 after -- some of them did not exist until after the filing of
20 the bankruptcy petition.

21 I have discussed that at length in my prior written
22 opinion, the fair contemplation test and what it means and --
23 and what the Court considers and how it's applied to determine
24 whether a claim in a bankruptcy case, or relating to a

1 post-petition for purposes of treatment and its affect --
2 being affected by the bankruptcy case. And I'm just going to
3 incorporate by reference and reiterate what I said in that
4 written opinion. For the record it's -- it was an opinion in
5 this case, In Re: City of Detroit, Michigan.

6 It's reported at 548 BR 748 and I did cite it in the
7 November 16 hearing and also in Footnote 1 of the November 18
8 order, docket 11679. And I reiterate what I ruled in that
9 written opinion about the fair contemplation test and how it's
10 applied.

11 In -- this includes the discussion in particular at Pages
12 761 to 763 of that opinion. But also other things that I
13 stated about that test in the rest of the opinion and applying
14 it to the particular claims before me in that -- in that
15 opinion.

16 Under the fair contemplation test in my view as I
17 describe it in the prior written opinion, the Court must
18 conclude that Crowell, Crowell, and Murphy have a pre-petition
19 claim or claims only at most against the city. And they have
20 not presented anything to demonstrate that they have
21 post-petition claims or claims that should be considered
22 arising after the petition date under the fair contemplation
23 test.

24 It's undisputed that the truck accident that led to all
25 of their alleged injuries and damages here and all their claim

1 occurred a month and a half before the filing of the
2 bankruptcy case and to the extent that any of them Crowell,
3 Crowell, and Murphy suffered any serious impairment of body
4 function as that term is used and defined in -- in Michigan
5 Compiled Laws Section 500.3135, the Court must conclude that
6 it occurred before the filing of the bankruptcy petition.

7 However, even if that is not the case, even if such
8 serious impairment either arose or was objectively manifested,
9 or known, any of those things, only after the petition date in
10 my view under the fair contemplation test properly interpreted
11 and applied, it is fair to, under all the circumstances, to
12 determine as I do that the entirety of the claims of these
13 individuals Crowell, Crowell, and Murphy arose -- deemed to
14 arise before the filing of the bankruptcy petition.

15 It's not -- that's based not only on the occurrence of
16 the accident well before the petition date, but that's also of
17 course the date from which the parties pre-petition -- or
18 relationship arises that -- and that form the basis of the
19 underlying claim. It is certainly fair to rule and I do rule
20 that Crowell, Crowell, and Murphy each fairly contemplated,
21 could have fairly contemplated that they would have a possible
22 claim against the City of Detroit for -- based on serious
23 impairment of body function to the extent they ever have had
24 such a claim they -- they had it before the petition date for
25 purposes of the fair contemplation test.

1 With -- as I said with respect to Najib Hodge, and the
2 Hodge motion there's no dispute the claim arose entirely pre
3 -- pre-petition. And so what we're dealing with here are
4 claims with respect to both of these motions that are
5 pre-petition claims, claims that arose before the petition
6 date.

7 Moving now to the remaining issue or issues. There is a
8 dispute between the city on the one hand and these creditors,
9 Crowell, Crowell, and Murphy, and Hodge on the other hand and
10 I'll just refer to the creditors involved in these motions
11 sometimes after this, just for shorthand as the creditors
12 here.

13 With respect to whether or not the so-called bar date
14 order that the city relies upon has and has had the effect of
15 barring and extinguishing effectively any claims -- any of
16 these pre-petition claims that -- that the creditors have sued
17 the city on and have asserted against the city based on the
18 pre-petition accidents, vehicle accidents that I've alluded
19 to.

20 The -- first of all, it is clear and I don't view it as
21 -- as really disputed seriously that but for the possible
22 effect of the confirmed plan of adjustment in this Chapter 9
23 case and the order confirming that plan, both of which were
24 filed and the plan which was confirmed on November 12, 2014

25 but for those things which I'll talk about in a minute, the
13-53846-tjt Doc 11916 Filed 06/16/17 Entered 06/16/17 15:03:05 Page 108 of

1 bar date order that the city has relied upon would have the
2 effect of barring the claims asserted here that are at issue
3 by the creditors and would require the Court to grant the
4 city's motion against these creditors.

5 The city by the way in -- in the motions against these
6 creditors seek similarly, they seek -- the city seeks an order
7 requiring the creditors to dismiss or cause to be dismissed
8 with prejudice their pending State Court lawsuits against the
9 city in Wayne County Circuit Court. And also the city seeks
10 an order determining that these creditors each are permanently
11 barred, estopped, and enjoined from asserting claims arising
12 from or related to their State Court lawsuits. And prohibited
13 from sharing in any distribution in this bankruptcy case.

14 That's the gist of what the orders -- proposed orders are
15 that the city seeks in both these motions against these
16 creditors. In any case my -- my conclusion is, and I think
17 it's clear and it's not seriously disputed, that if the Court
18 were looking only at the bar date order, such relief would be
19 appropriate and the motions would need to be granted.

20 The bar date order that I'm talking about of course is
21 the -- the one that was filed November 21, 2013 in this
22 bankruptcy case at docket number 1782. I'll refer to that as
23 the bar date order. That by the way is the definition of the
24 phrase with capital -- initial capitals, Bar Date Order in the
25 confirmed plan. Specifically it's that bar date order.

1 The bar date order as the city correctly points out in
2 their supplemental brief, docket 11755 and elsewhere,
3 established a deadline of February 21, 2014 for filing claims
4 against the city in the bankruptcy case and required that all
5 -- in general all pre-petition creditors, certain specific
6 exceptions stated in the -- in the bar date order, must file a
7 proof of claim in the city bankruptcy case by the February 21,
8 2014 date. That's Paragraph 6 of the bar date order among
9 other provisions.

10 And as the city points out Paragraph 22 of the bar date
11 order says, and I'm parsing the -- parsing it out, but the
12 gist of it is that any creditor who is required by the bar
13 date order to file a proof of claim by the February 21, 2014
14 deadline but fails to do so by that deadline, and now I'm
15 going to quote it -- "shall be forever barred, estopped, and
16 enjoined from asserting any claim against the city or property
17 of the city."

18 And there is other language. But that's the gist of it
19 and that's what it means as it applies to the claims in this
20 -- that are at issue now in -- in these motions. It also said
21 that such creditors are barred from receiving distributions
22 under any Chapter 9 plan in this bankruptcy case as well if
23 they fail to file a timely proof of claim.

24 It's clear that all the creditors before me in these

1 to their claims that are the subject of the city's motions
2 here, were required by the bar date order to file a proof of
3 claim by the February 21, 2014 deadline. That is none of
4 these creditors' claims were subject to any exceptions that
5 were stated in the bar date order to the -- the requirement to
6 file a proof of claim and to face having the claims barred,
7 estopped, and enjoined, assertion of any claims barred,
8 estopped, or enjoined if the creditor failed to do that,
9 failed to timely file the proof of claim.

10 So the bar date order standing alone and without
11 considering yet the effect of the confirmed plan provisions on
12 -- on the bar date order if any, would bar the claims asserted
13 by each of these creditors that are at issue here and require
14 the Court to grant the city's pending motions.

15 The issue though and the dispute is -- arises from the
16 arguments made by the creditors here that certain provisions
17 in the city's confirmed plan and in the order confirming that
18 plan, change that result. And -- and have changed what would
19 otherwise be the result under the bar date order with respect
20 to their claims.

21 As I mentioned earlier the city's Chapter 9 plan of
22 adjustment was confirmed by the order confirming plan that was
23 entered by the Court on November 12, 2014 at docket number
24 8272. There is a rather -- a very lengthy order confirming
25 plan that's filed at that docket number. Also at that docket

1 number attached to the order confirming plan is a copy of the
2 confirmed plan itself, the eighth amended plan for the
3 adjustment of the debts of the City of Detroit.

4 The order confirming plan modified in some respects that
5 plan, but otherwise confirmed it. And so we look to both the
6 order confirming plan and the plan with respect to the
7 particular terms that the -- that are in issue on these
8 motions.

9 And those -- those are Article IV sub -- or Section S of
10 the plan which appears in the plan itself at Pages 62 to 63.
11 And Paragraph Q.58 on Page 108 of the order confirming plan
12 which is very similar to the plan provision that I've just
13 cited.

14 Those are lengthy provisions and they're -- they're
15 basically the same in their wording, but I'll start with the
16 reading the key language from the plan provision, Article IV,
17 Section S on Page 62 to 63.

18 It is a lengthy provision so I'm not going to read all of
19 it, but I do incorporate the entirety of it by reference here
20 for purposes of my bench opinion.

21 But in reading the key wording I think here, that
22 provision says, "from an act after the effective date the city
23 will continue to administer either directly or through a third
24 party administrator and pay valid pre-petition claims for

1 maintain insurance coverage pursuant to MCL Section 500.3101
2 in connection with the operation of the city's motor vehicles
3 as follows." And then -- unquote.

4 And then there is -- there are three categories of types
5 of claims that fall under that broad category. The first of
6 which is claims for personal protection benefits as provided
7 by MCL Section 500.3107 and 3108 for which insurance coverage
8 is required by MCL Section 500.3101-1.

9 Those according to this provision are to be paid in full,
10 "to the extent valid" with certain exception for interest and
11 attorney fees.

12 The second category is "tort claims permitted by MCL
13 Section 500.3135." And then I'm skipping some wording. It
14 says shall be paid to the "shall be paid to the extent valid,"
15 only up to certain amounts.

16 And the third category is "claims for property protection
17 benefits under MCL Section 500.3121 and MCL Section 500.3123"
18 which -- which the plan language says, "shall be paid, to the
19 extent valid," only to -- up to a certain maximum amount. Any
20 excess of which over the maximum amount there, the provision
21 says, shall be treated as an other unsecured claim or a
22 convenience claim as applicable. Those are particular classes
23 in the -- other classes in the plan.

24 Then the provision -- plan provision says, "nothing in
25 the plan shall discharge, release, or relieve the city from

1 any current or future liability with respect to claims subject
2 to insurance coverage pursuant to MCL Section 500.3101, or
3 claims within the minimum coverage limits in MCL Section
4 500.3009-1."

5 It continues, "the city expressly reserves the right to
6 challenge the validity of any claim subject to this Section
7 IV.S, and nothing herein shall be deemed to expand the city's
8 obligations or claimants' rights with respect to these claims
9 under state law."

10 I'll refer to this provision as the motor vehicle plan
11 provision just for short. Now the order confirming plan as I
12 mentioned has a Paragraph Q.58 on Page 108. Again this is
13 docket 8272 that corresponds to the motor vehicle plan
14 provision that I just read from at -- at length.

15 It's not quite as long but it is -- it is worded
16 basically the same. In part it says, "from and after the
17 effective date the city shall continue to administer (either
18 directly or through a third party administrator) and pay valid
19 pre-petition claims for liabilities with respect to which the
20 city is required to maintain insurance coverage pursuant to
21 MCL Section 500.3101 in connection with the operation of the
22 city's motor vehicles consistent with the terms of Section
23 IV.S of the plan. Nothing in the plan or this order shall
24 discharge, release, or relieve the city from any current or
25 future liability with respect to claims subject to insurance

1 coverage pursuant to" -- and then worded similarly to the plan
2 provision.

3 And this provision in the order confirming plan goes on
4 to say, "provided that the city shall retain the right to
5 challenge the validity of any claim subject to Section IV.S of
6 this plan or this paragraph. And nothing therein or herein
7 shall be deemed to expand the city's obligations or any
8 claimant's rights with respect to such claims under state
9 law."

10 The wording for all material purposes in my ruling on the
11 issues involved in the motions currently before me of this
12 plan -- that order confirming plan provision that I've just
13 quoted from is -- is the same in all material respects to the
14 motor vehicle plan provision that I quoted from earlier. And
15 so what I say about one the language in front of those
16 provisions, the motor vehicle plan provision or the order
17 confirming plan provision, will apply to the other.

18 And so just for simplicity, I'll -- I'll -- I'll focus on
19 specifically the language in the motor vehicle plan provision
20 in the plan itself that I quoted from at length earlier.

21 The creditors argue that the motor vehicle plan provision
22 means that claims of the type they're -- they are pursuing
23 against the city in their State Court lawsuits, are claims
24 covered by the motor vehicle plan provision in which the city

1 and pay to the extent the claims are valid under state law
2 even though and even if as the case with these creditors, the
3 creditors did not file any proof of claim in the bankruptcy
4 case for those claims, timely or otherwise.

5 And it's -- it's undisputed that none of these creditors
6 filed a timely proof of claim, that is a claim -- a proof of
7 claim by the bar date of February 21, 2014, or even otherwise
8 to date in the bankruptcy case for these claims at issue.

9 In any event these creditors argue they didn't have to do
10 that because the meaning of the motor vehicle plan provision
11 language that I've read from did not require them to do that
12 and superseded and effectively had the -- had the effect of
13 amending any requirement that they file a timely proof of
14 claim that may have existed before the confirmed plan --
15 before the plan was confirmed as a result of the language in
16 the bar date order.

17 The city disputes that view and argues to the contrary
18 that the plan considering not only the -- the provisions that
19 I have referred to and quoted, but also other -- certain other
20 provisions in the plan made clear that the bar date order was
21 not affected or superseded in any way but continued to be
22 fully effective against all claims of the type covered --
23 including claims of the type covered by the motor vehicle plan
24 provision.

1 their interpretation of these plan provisions is the correct
2 and unambiguous provision. I think as an alternative argument
3 the creditors, or at least some of them argue that at worst
4 from their perspective that the language that -- the material
5 language here in the plan is ambiguous and should be construed
6 against the drafter meaning in their view the City of Detroit
7 if it's -- if it's ambiguous. And so their view should
8 prevail even if the Court determines that the plan, confirmed
9 plan is ambiguous on the key issue.

10 The rule construing an ambiguity in a contract against
11 the drafter is certainly part of Michigan law on contract
12 interpretation, but the rule has no application here. The
13 affidavits filed by the city with the city's two supplemental
14 briefs that were filed at docket 11755 and 11812 each made
15 clear that this -- the motor vehicle plan provision that
16 appears in the plan and the corresponding order confirming
17 plan language that I quoted from was language that was jointly
18 drafted by the city and the State of Michigan and
19 significantly negotiated.

20 So it is not the case that the city is the sole drafter
21 of the language, rather the State of Michigan which evidently
22 had as its purpose to benefit claimants of the type -- or the
23 type of claims that the creditors here are asserting,
24 negotiated that and jointly drafted it with the city. And so

25 this rule construing ambiguities against the drafter would not
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1 apply even if the Court found that the relevant plan language
2 was ambiguous.

3 The city's view and interpretation that it urges the
4 Court to adopt of the motor vehicle plan provision, and the
5 plan as a whole, and the bar date order, all in combination,
6 is as I understand it includes the following arguments.

7 First, the city argues the language in the motor vehicle
8 plan provision and the -- also the order confirming plan on
9 which the creditors rely required in order for the city to
10 have any obligation to administer and pay claims, motor
11 vehicle related claims, those claims had to be valid
12 pre-petition claims. That's the phrase used in these plan
13 provisions and the term valid is used repeatedly in these plan
14 provisions several times.

15 Taking the motor vehicle plan provision that I quoted
16 from earlier, the opening words say the city will continue to
17 administer and pay valid pre-petition claims for liabilities,
18 et cetera and each of the three categories of claims listed
19 thereafter that I quoted from and described, all required
20 payment only, "to the extent valid". That is payment of
21 claims to the extent valid. And used that word valid.

22 The city argues that the use of the word valid there
23 means or -- or includes a claim that is not barred by the bar
24 date order. That is valid includes the requirement that the
25 pre-petition claim be the subject of a timely filed proof of

1 claim that complies with the bar date order.

2 The creditors of course disagree with that, take a
3 different view of the meaning of that word valid. As I
4 understand them their argument is valid means only valid in
5 the sense that a claim would be valid under Michigan law
6 outside of bankruptcy without -- without regard to whether or
7 not a proof of claim were filed or timely filed in this
8 bankruptcy case.

9 The creditors also point to the no discharge language in
10 the motor vehicle plan provision that I quoted from at length
11 earlier. The language that says, "nothing in the plan shall
12 discharge, release, or relieve the city from any current or
13 future liability with respect to claims subject to insurance
14 coverage, et cetera."

15 Creditors say that -- that that no discharge language and
16 its reference to no discharge of any current or future
17 liability of -- of these types of claims also shows that
18 claims of that type did not have to be the subject of a timely
19 filed proof of claim in order to be protected from discharge
20 release -- or release by this language in the plan.

21 The city disagrees and the city argues that the phrase
22 any current or future liability as used in that no discharge
23 provision includes only claims that are the subject of
24 liability in that they are not barred by the bar date order

25 and the failure to timely file a proof of claim. In other
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1 words the city argues that the bar date order in the case of
2 the claims of these creditors before us today had the effect
3 of eliminating any liability of the city on those creditors'
4 claims, current or future, any liability because of the
5 language of the bar date order that I quoted from earlier
6 which said among other things that in essence that a creditor
7 that failed to -- holder of a pre-petition claim who failed to
8 file a timely proof of claim, "shall be forever barred,
9 estopped, and enjoined from asserting any claim against the
10 city or property of the city."

11 The bar date order as I mentioned earlier was filed on
12 November 21, 2013 at docket 1782 in this case. The bar date
13 of February 21, 2014 of course had come and gone many months
14 earlier before the plan was confirmed in this case. And that
15 the failure of these creditors to file any claim, a proof of
16 claim rather, by that February 21, 2014 date automatically
17 meant under the bar date order that as soon as that deadline
18 for filing the proof of claim passed, these creditors with
19 respect to their pre-petition claims no longer had any valid
20 claims and the city no longer had any liability, including
21 current and future liability within the meaning of the no
22 discharge language of the motor vehicle plan provisions that
23 later became part of the confirmed plan.

24 The -- in my view the city's arguments that I have
25 described up to this point are -- are certainly reasonable.

1 They are reasonable interpretations of the plan language.
2 Whether they are more than that or whether they are the only
3 reasonable interpretation of the plan language, I think it is
4 greatly influenced by a couple of other provisions in the plan
5 that was confirmed.

6 Chiefly actually one other provision. And that is the
7 provision on Page 32 of the confirmed plan, docket number
8 8272, Article II, Section A.2.D on Page 32 of the plan which
9 says, "the plan does not modify any other Bar Date Order, and
10 bar date order is initial capitals there, including bar dates
11 for claims entitled to administrative priority under Section
12 503(b)(9) of the Bankruptcy Code."

13 There is also a reference in Section -- Article II,
14 Section A.2.A on Page 31 of the plan which is labeled general
15 bar date provisions that also talks about the effects or
16 non-effect of the plan on bar dates and bar date orders.

17 I, in my view, these provisions and especially subsection
18 D on Page 32 of the confirmed plan is unambiguous and makes
19 absolutely clear and unambiguous in the confirmed plan that
20 the bar date order at issue today before me, docket 1782, was
21 not modified in any way, or affected, or changed, or made
22 subject of exceptions in any way by the confirmed plan of
23 adjustment.

24 Bar date order by the way, that phrase with initial

1 is defined in the definition section of the plan, Page 5 of
2 the plan, docket 8272 definition number 43 to mean among other
3 things specifically the bar date order at docket 1782 which is
4 the bar date order that I'm -- what I'm talking about today.

5 And so the confirmed plan, the same confirmed plan that
6 contains the motor vehicle plan provision on which creditors
7 rely and the meaning of which they argue about here makes
8 clear and unambiguous that the plan of adjustment, the
9 confirmed plan of adjustment does not modify the bar date
10 order.

11 To the extent there is any ambiguity in the motor vehicle
12 plan provision as the creditors' counsel suggests there might
13 be, that ambiguity is resolved in my view by this provision on
14 Page 32 of the confirmed plan. That makes clear that the
15 plan, confirmed plan does not modify the bar date order.

16 Further, further support in my view for the city's
17 position and interpretation of the plan is the language found
18 at the very end of the motor vehicle plan provision which I
19 quoted from earlier. In the motor vehicle plan provision the
20 language says, "the city expressly reserves the right to
21 challenge the validity of any claim subject to this Section
22 IV.S, and nothing herein shall be deemed to expand the city's
23 obligation or claimant's rights with respect to these claims
24 under state law."

1 very last sentence of that Section IV.S. That sentence that I
2 just read from in my view draws a distinction between this
3 concept of the validity of a claim subject to this Section
4 IV.S., this motor vehicle plan provision on the one hand, and
5 the city's -- the city's obligation or claimant's rights with
6 respect to these claims under state law on the other hand by
7 treating them as two different things in this compound
8 sentence that concludes this section of the confirmed plan.

9 And clearly implies in my view and supports a view that
10 this notion of validity and the word valid as used repeatedly
11 earlier in that paragraph of the confirmed plan is broader and
12 means something more than just whatever obligations or rights
13 the city or the claimants had that is whatever obligations the
14 city had or the claimants had with respect to these claims
15 under state law.

16 In other words, it undercuts in my view the creditors'
17 argument that valid as used earlier in this section of the
18 confirmed plan, that the word valid means only valid under
19 state law. Rather this strongly supports the view that valid
20 is something more than that and -- and the obvious thing that
21 is more than that is the claim in order -- the claims in order
22 to be valid within the meaning of the language earlier in this
23 paragraph have to be the subject of timely filed proofs of
24 claim which of course is not a requirement under state law for
25 a claim to have validity, it's -- it is therefore support for

1 the broader view that the city espouses of this notion of
2 valid.

3 I think that combined with the language in the bar date
4 order itself cited by the city from Page 22 of the bar date
5 order that I quoted earlier, that says that a party that fails
6 to properly file a timely proof of claim by the bar date,
7 "shall be forever barred, estopped, and enjoined from
8 asserting any claim against the city or property of the city,"
9 further supports the -- the notion that the motor vehicle plan
10 provisions referenced to and limits -- limitations to applying
11 only the valid claims implies clearly a requirement that such
12 claim and such pre-petition claims be the subject of timely
13 filed proofs of claim in the bankruptcy case.

14 And of course overlaid all of this is -- over all of this
15 is the plan provision that clearly says that the plan -- the
16 bar date order is not modified by the confirmed plan. Putting
17 this all together in my view is -- does not lead to
18 inconsistencies in -- in the interpretation the city has
19 argued and which I -- I -- as I've said I agree with. Rather
20 I find and conclude that the -- these relevant provisions of
21 the plan, the order confirming plan, and the bar date order
22 are fairly consistent with each other under this
23 interpretation and in my view the plan, the confirmed plan,
24 the order confirming plan, and the bar date order all -- are
25 all unambiguous in meaning what I have ruled they mean.

1 The city in my view in short is correct and therefore the
2 bar date order does retain full vitality and does apply fully
3 to the claims of these creditors and therefore means that the
4 motor vehicle plan provision of the confirmed plan does not
5 entitle these creditors to any relief or give them any right
6 to pursue any claims against the city such as the claims they
7 are pursuing or have been pursuing in their State Court
8 lawsuits. Rather all such claims are barred under the
9 unambiguous language of the bar date order and the confirmed
10 plan of adjustment in this case.

11 And so based on all of that, the Court must and will
12 grant the city's motions, both of them with respect to the
13 Hodge motion and the Crowell, Crowell, and Murphy motion. Mr.
14 Swanson, I'll ask you to submit the proposed order that the
15 city attached to each of these motions.

16 I'll make some non-substantive changes to the first
17 paragraph to recite the hearings that we had, and the
18 proceedings that we had, and the bench opinion I've given
19 today and so forth. But I don't anticipate making any
20 substantive changes to the proposed orders.

21 So the motions will be granted and I'll ask you to submit
22 those orders as soon as possible. I'll waive any further
23 presentment of them. Thank you all.

24 MR. DEDVUKAJ: Thank you, Your Honor.

25 MR. SWANSON: Thank you, Your Honor.

1 (Court Adjourned at 4:22 p.m.)

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6
7 We certify that the foregoing is a correct transcript from the
8 electronic sound recording of the proceedings in the
9 above-entitled matter.

10
11 /s/Deborah L. Kremlick, CER-4872
12 Jamie Laskaska

Dated: 4-3-17