

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

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Judge Thomas J. Tucker

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**CERTIFICATION OF NO RESPONSE OR OBJECTION  
REGARDING DEBTOR'S FIFTY-FIRST OMNIBUS OBJECTION TO  
CERTAIN CLAIMS**

**(Workers' Compensation Claims Not Subject to the Claims Process in this  
Bankruptcy Case)**

On July 5, 2017, the City Of Detroit ("City") filed its Fifty-First Omnibus Objection to Certain Claims (Workers' Compensation Claims Not Subject to the Claims Process in this Bankruptcy Case) ("51st Omnibus Objection"). [Doc. No. 11938]. The 51st Omnibus Objection was served by the City's claims and noticing agent, Kurtzman Carson Consultants, upon the claimants identified in Exhibit 2 of the 51st Omnibus Objection at the address set forth by each of the claimants on its respective proof of claim, and all other parties who have requested notice pursuant to Bankruptcy Rule 2002. *See Certificate of Service Exhibit A.*



No responses to the 51st Omnibus Objection have been filed with the Court and the time to do so has passed. The City respectfully requests that the Court enter an order in substantially the same form as the one which was attached to the 51st Omnibus Objection. *See Proposed Order* Exhibit B.

Respectfully submitted,

By: /s/ Marc N. Swanson

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Attorneys for the City of Detroit

DATED: August 18, 2017

## **Exhibit A**

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

In re:

Chapter 9

City of Detroit, Michigan,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

---

**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 July 5, 2017, at my direction and under my supervision, employees of KCC caused to be served the following document via Email on the service list attached hereto as **Exhibit A**; and via First Class mail on the service lists attached hereto as **Exhibit B** and **Exhibit C**:

- **Debtor's Fifty-First Omnibus Objection To Certain Claims (Workers' Compensation Claims not Subject to the Claims Process in this Bankruptcy Case)** [Docket No. 11938]

Dated: July 6, 2017

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

# **EXHIBIT A**

**Exhibit A**  
**Served via Email**

| Party Description   | Company   | Contact   | Email                          |
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| Union Representative  | AFSCME Council #25  | Attn: Albert Garrett  | agarrett@miafscme.org          |
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| Union Representative  | AFSCME Local #2394  | Attn: Yalonda King  | presidentlocal1227@hotmail.com |
| Union Representative  | AFSCME Local #2799  | Attn: Yvonne Ross   | KingY687@detroitmi.gov         |
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**Exhibit A**  
**Served via Email**

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**Exhibit A**  
**Served via Email**

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| Counsel for Chapter 7 Trustee, Charles Taunt   | Dib and Fagan PC                                 | Barry S Fagan   | info@drcea.org  |
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**Exhibit A**  
**Served via Email**

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| Counsel for New England Fertilizer Company and Wade Trim Associates Inc  | Kerr Russell and Weber PLC                | Jason W Bank   | jbank@kerr-russell.com  |
| Counsel for the City of Detroit Water and Sewerage Department and its Board of Water Commissioners   | Kilpatrick & Associates PC                | Richardo I Kilpatrick  | ecf@kaalaw.com  |
| Counsel for Syncora Capital Assurance Inc., Syncora Holdings Ltd Syncora Guarantee Inc and Syncora Capital Assurance Inc   | Kirkland & Ellis LLP                      | James HM Sprayregen PC Ryan Blaine Bennett & Noah J. Ornstein  | james.sprayregen@kirkland.com; ryan.bennett@kirkland.com; noah.ornstein@kirkland.com        |
| Counsel for Nuveen Asset Management and BlackRock Financial Management, Inc.   | Kramer Levin Naftalis & Frankel LLP       | Att Amy Caton  | acaton@kramerlevin.com  |
| Counsel to Certain Significant Holders of the COPs   | Kramer Levin Naftalis & Frankel LLP       | Thomas Moers Mayer   | tmayer@kramerlevin.com  |

**Exhibit A**  
**Served via Email**

| Party Description  | Company   | Contact   | Email   |
|--|---|---|---|
| Detroit Police Lieutenants and Sergeants Association; and Detroit Police Officers Association; Detroit Fire Fighters Association, I.A.F.F. Local 344; Sanitary Chemists and Technicians Association; Association of Detroit Engineers; John Runyan | Law Office of Barbara A. Patek, PLC                 | Barbara A Patek   | pateklaw@gmail.com                                      |
| Counsel for Kim Spicer   | Law Offices of Elizabeth A Ferguson PLLC            | Elizabeth A Ferguson  | lizferguson@lawofficesaferguson.com                     |
| Counsel for St Martins Cooperative   | Law Offices of Lee & Correll                        | Michael K Lee   | mlee@leeandcorrell.com                                  |
| Counsel for JE Associates  | LeClair Ryan  | Evan A Burkholder   | evan.burkholder@leclairryan.com                         |
| Counsel for the Detroit Fire Fighters Association IAFF Local 344   | Legghio & Israel PC                                 | Christopher P. Legghio & Alidz Oshagan                      | CPL@legghioisrael.com; oshagan@legghioisrael.com        |
| Interested Party   | Linebarger Goggan Blair & Sampson LLP               | John P Dillman  | john.dillman@lgbs.com                                   |
| Counsel for the Retired Detroit Police and Fire Fighters Association; Donald Taylor; Detroit Retired City Employees Association; and Shirley V Lightsey  | Lippitt O Keefe PLLC                                | Attn Brian O Keefe  | bokeefe@lippittokeefe.com                               |
| Counsel for the Retired Detroit Police and Fire Fighters Association; Donald Taylor; Shirley V Lightsey; and Detroit Retired City Employees Association  | Lippitt O Keefe PLLC                                | Att Ryan C Plecha   | rplichea@lippittokeefe.com                              |
| Counsel for FK Park, LLC and FK South, LLC   | Maddin, Hauser, Roth & Heller, P.C.                 | Ian S Bolton  | ibolton@maddinhauser.com                                |
| Counsel for Syncora Guarantee Inc  | Mantese Honigman Rossman and Williamson PC          | Brendan Frey  | bfrey@manteselaw.com                                    |
| Counsel for Syncora Guarantee Inc  | Mantese Honigman Rossman and Williamson PC          | Ian M Williamson  | iwilliamson@manteselaw.com                              |
| Counsel for Amalgamated Transit Union Local 26   | Mark H Cousens                                      | John E. Eaton, Esq.   | jeaton@cousenslaw.com                                   |
| Counsel for the Detroit Police Lieutenants and Sergeants Association   | Matheson Parr Osmer & Stevens PLC                   | John A Stevens  | jstevens@mathesonparr.com                               |
| Interested Party   | McAlpine PC   | Mark L McAlpine   | mlmcalpine@mc Alpinepc.com                              |
| Counsel for US Bank National Association   | McDermott Will & Emery LLP                          | Jeffrey A Rossman   | jrossman@mwe.com  |
| Counsel for U.S. Bank National Association (Top 20 Creditor)   | McDermott Will & Emery LLP                          | Attn: William P. Smith, Esq.                                | wsmith@mwe.com  |
| Counsel for U.S. Bank National Association   | McDermott Will & Emery LLP                          | William P Smith & Nathan F Coco                             | wsmith@mwe.com; ncoco@mwe.com                           |
| Counsel for Syncora Holdings Ltd Syncora Guarantee Inc and Syncora Capital Assurance Inc   | McDonald Hopkins PLC                                | Joshua A Gadharf  | jgadharf@mcdonaldhopkins.com                            |
| Counsel for Bishop Real Estate, L.L.C.   | McDonald Hopkins PLC                                | Jason L Weiner  | jweiner@mcdonaldhopkins.com                             |
| Counsel for CSX Transportation Inc   | McGuireWoods LLP                                    | John H Maddock  | jmaddock@mcguirewoods.com                               |
| Counsel for Michigan Council 25 of the American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO  | McKnight McCloy Canzano Smith & Radtke PC           | John R Canzano  | jcanzano@michworklaw.com                                |
| Counsel to Michael J. Karwoski   | Michael J. Karwoski, Esq.                           |   | mjkarwoski@alumni.nd.edu                                |
| Counsel to City of Detroit Michigan  | Miller Canfield Paddock & Stone PLC                 | Stephen S LaPlante  | laplante@millercanfield.com                             |
| Counsel for Meijer, Inc  | Miller Canfield Paddock & Stone, PLC                | Timothy A Fusco   | fusco@millercanfield.com                                |
| Counsel for Michigan American Federation of State, County and Municipal Employees Local 3308 and Local 917   | Miller Cohen PLC                                    | Robert D Fetter & Richard G Mack Jr                         | rfetter@millercohen.com; richardmack@millercohen.com    |
| Counsel to the City  | Miller, Canfield, Paddock and Stone, P.L.C.         | Jonathan S. Green, Esq. Stephen S. LaPlante                 | green@millercanfield.com; swanson@millercanfield.com    |
| Counsel for Fidelity Management & Research Company and Eaton Vance Management  | Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. | Marc N. Swanson & Eric D Carlson                            | laplante@millercanfield.com; carlson@millercanfield.com |
|  |   | William W Kannel & Adrienne K Walker                        | wwkannel@mintz.com; awalker@mintz.com                   |
| Counsel for Patricia Ramirez; Denise Gardner; Sheila Johnson; Kimberly James   | Morgan & Meyers PLC                                 | Brian T Keck  | bkeck@morganmeyers.com                                  |
| Proposed Counsel for Committee of Unsecured Creditors [motion denied]  | Morrison & Foerster, LLP                            | Brett H. Miller and Lorenzo Marinuzzi                       | brettmiller@mofo.com; lmarinuzzi@mofo.com               |
| Office of the United States Trustee  | Office of the United States Trustee                 | Maria D Giannirakis   | Maria.D.Giannirakis@usdoj.gov                           |
| Office of the United States Trustee  | Office of the United States Trustee                 | Sean Cowley   | Sean.Cowley@usdoj.gov                                   |
| Counsel for Federal National Mortgage Association, creditor c/o Seterus, Inc., in the entitled action; and Everhome Mortgage Company as servicing agent for Everbank   | Orlans Associates, P.C                              | Caleb J. Shureb, Heather D. McGivern, and Heather M. Dickow | hmcgivern@orlans.com; hdickow@orlans.com                |
| Counsel for Michigan Property Tax Relief LLC; Gary Segatti and P.P.T.A., Inc., or Harold Hoyt; Jackie's Transport, Inc.  | Osipov Bigelman PC                                  | Yuliy Osipov  | yo@osbig.com  |
| Counsel for UBS AG (COP Swap Counterparties)   | Paul Weiss Rifkind Wharton & Garrison LLP           | Daniel J Kramer & Kelley a Cornish                          | kornish@paulweiss.com; dkramer@paulweiss.com            |
| Counsel for Fountain Park Court Consumer Housing Cooperative St. James Cooperative, Individually and on Behalf of all Similarly Entities   | Pentiuk Couvreur & Kobiljak PC                      | Randall A Pentiuk & Michael A Karman                        | rpentiuk@pck-law.com                                    |
| Counsel for Debtor City of Detroit Michigan; Michigan, Kevyn D. Orr, John Naglick, Michael Jamison, and Cheryl Johnson   | Pepper Hamilton LLP                                 | Robert S Hertzberg  | hertzbergr@pepperlaw.com                                |
| Counsel for Debtor City of Detroit Michigan  | Pepper Hamilton LLP                                 | Deborah Kovsky-Apap   | kovskyd@pepperlaw.com                                   |
| Counsel for Debtor City of Detroit Michigan  | Pepper Hamilton LLP                                 | Kay Standridge Kress  | kressk@pepperlaw.com                                    |

**Exhibit A**  
**Served via Email**

| Party Description  | Company  | Contact                                    | Email  |
|--|--|--|--|
| Counsel for Community Foundation for Southeast Michigan; William Davidson Foundation; The Fred A. and Barbara M. Erb Family Foundation; Max M. and Marjorie S. Fisher Foundation; The Ford Foundation; Hudson-Webber Foundation; W.K. Kellogg Foundation; McGregor Fund; Charles Stewart Mott Foundation; and A. Paul and Carol C. Schaap Foundation (Collectively, the "Foundations")   | Plunkett Cooney  | Douglas C Bernstein                        | dbernstein@plunkettcooney.com                              |
| Counsel for Waste Management, Inc.   | Plunkett Cooney  | David A. Lerner & Patrick C Lannen         | dlierner@plunkettcooney.com;<br>plannen@plunkettcooney.com |
| Top 20 Creditor - City's Pension Trusts  | Police and Fire Retirement System of the City of Detroit | Attn: Joseph E. Turner, Esq.               | jturner@clarkhill.com                                      |
| Union Representative   | Police Officers Association of Michigan                  | Attn: John Barr                            | poam@poam.net  |
| Union Representative   | Police Officers Labor Council                            | Attn: Chet Kulesza                         | ck445polc@yahoo.com  |
| Union Representative   | Police Officers Labor Council                            | Attn: Marvin Hansberry                     | HansberryM@detroitmi.gov                                   |
| Union Representative   | Police Officers Labor Council                            | Attn: Jan Zaleski                          | presidentjan@aol.com                                       |
| Counsel for CitiMortgage, Inc.   | Potestivo & Associates PC                                | Mary Atallah                               | matallah@potestivolaw.com                                  |
| Interested Party   | Primeshares World Markets, LLC                           |  | jd@primeshares.com;<br>transfer@primeshares.com            |
| Counsel for Michael Beydoun  | Raymond Guzall III PC                                    | Raymond Guzall III                         | rayguzall@attorneyguzall.com                               |
| Counsel enters an appearance for The Bank of New York Mellon (successor by operation of law to The Bank of New York), as custodian of the Police and Fire Retirement System of the City of Detroit Fund and as custodian of the General Retirement System of the City of Detroit Fund  | Reed Smith LLP   | Amy M Tonti                                | atonti@reedsmith.com                                       |
| Attorneys for Creditors: Carlton Carter, Bobby Jones, Roderick Holley and Richard T. Weatherly   | Resnick & Moss PC  | H Nathan Resnick                           | hnresnick@resnicklaw.net;<br>hnresnick@resnicklaw.com      |
| Retiree Representative   | Retired Detroit Police and Fire Fighters Association     | Attn: Donald Taylor                        | rdpfa@hotmail.com  |
| Counsel to Eric Kimbrough, Leinathian Jelks, Brandon Brooks, Phyllis Tharpe, Rodney Heard, Clenette Harris, Gregory Brazell, Jennifer Harris-Barnes, Henry Hassan, Melvin Miller, Terry Hardison, Velma, Denson, Raymond Thompson, Lucy Flowers, Brandon Gilbert, Brady Johnson, Quentin King, Sharon Pettway, Taralyn Smith, Donna Weatherspoon, Tarita Wilburn, Joseph Wright, Laverne Covington, James Matson, Kevin McGillivray, Rhonda Craig, Orlando Marion, John Collins, Terry Hardison, Carolyn Harp, Jeffrey Peterson, Clementine Stephens, Ezekiel Davis, Michael McKay, David Both, Raymond Thompson, Jr., Doug Taylor, Shumithia Baker, Floyd Brunson, Jerry Ashley, Anthony Harmon, Shelton Bell, Jr., Jeremiah Duren, Otis Evans, Wendy Jefferson, Gary Musser, Mario Littlejohn, Angela Davis, Jeffrey Theriot, Bernard White, Eddie Moore, Robert McGowen, Curtis Morris, Hondra Porter, Kevin McDonald, Jay Woods, Taesean Parnell, Yvette Spencer, Viena Lowe, Landon Banks, Darchella Lattner, Nicholas Martin, Marily Cloyd, Robert Hall, Victoria Wilson, Theresa Chalch, Angela Davis, Jamie Jackson, Donald Harris, Winter Owens, Samiya Speed, Teran Brown, Antonio Brooks, Jermaine Gleen, Ray Lizzamore, Daniel Latanzio, Woodrow Roberson, Kevin | Romano Law PLLC  | Attn Daniel G Romano & Trevor J. Zamborsky | tzamborsky@romanolawpllc.com;<br>dromano@romanolawpllc.com |
| Counsel for Robbie Flowers, Michael Wells, Janet Whitson, Mary Washington and Bruce Goldman ("Flowers plaintiffs"); and Detroit Police Command Officers Association ("DPCOA"); Detroit Fire Fighters Association, I.A.F.F. Local 344   | Sachs Waldman PC   | Mami Kato & Mary Ellen Gurewitz            | mkato@sachswaldman.com;<br>mgurewitz@sachswaldman.com      |
| Counsel for Official Retiree Committee   | Salans FMC SNR Dentons Europe LLP                        | Claude Montgomery                          | claudemontgomery@Dentons.com                               |
| Union Representative   | Sanitary, Chemists & Technicians Association             | Attn: Saulius Simoliunas                   | simoliun@dwsd.org  |
| Contract Counterparty  | SBS Financial Products Company, LLC                      | Attn. John Carter                          | jcarter@sbsco.com  |
| Counsel for Ambac Assurance Corporation  | Schafer and Weiner PLLC                                  | Brendan G Best                             | bbest@schaferandweiner.com                                 |
| Counsel for Parsons Brinckerhoff Michigan, Inc.  | Schiff Hardin LLP  | Andrew M. Minear                           | aminear@schiffhardin.com                                   |
| Counsel for FMS Wertmanagement AöR   | Schiff Hardin LLP  | Frederick J. Sperling & Paul E. Greenwalt  | fsperling@schiffhardin.com;<br>pgreenwalt@schiffhardin.com |
| Counsel for DEPFA Bank PLC   | Schiff Hardin LLP  | Rick L Frimmer & Matthew W Ott             | rfrimmer@schiffhardin.com;<br>mott@schiffhardin.com        |
| Counsel for DEPFA Bank PLC   | Schiff Hardin LLP  | Suzanne L Wahl                             | swahl@schiffhardin.com                                     |
| Counsel for Schneiderman and Sherman PC; Attorney for U.S. Bank National Association as servicer for Michigan State Housing Development Authority; Flagstar Bank, FSB; Counsel for Kondaur Capital Corporation   | Schneiderman & Sherman PC                                | Neil Sherman                               | NSherman@sspclegal.com                                     |
| Union Representative   | SEIU Local 517M  | Attn: Yolanda Langston                     | langstony@gmail.com  |

**Exhibit A**  
**Served via Email**

| Party Description   | Company  | Contact  | Email   |
|---|--|--|---|
| Union Representative  | Senior Accountants, Analysts & Appraisers Association  | Attn: Audrey Bellamy   | ayoung586@comcast.net   |
| Union Representative  | Senior Water Systems Chemist Association   | Attn: Andrew Ross  | aross@dwsd.org  |
| Counsel for The Kales Grand Circus Park LLC   | Seyburn Kahn   | David T Lin  | dlin@seyburn.com  |
| Fee Examiner  | Shaw Fishman Glantz & Towbin LLC   | Ira Bodenstein Gordon Gouveia David Doyle and Marc Reiser              | ibodenstein@shawfishman.com;<br>ggouveia@shawfishman.com;<br>ddoyle@shawfishman.com;<br>mreiser@shawfishman.com                   |
| Counsel for Detroit Winsor Tunnell LLC  | Sheldon S Toll PLLC  | Sheldon S Toll   | lawtoll@comcast.net   |
| Counsel for National Public Finance Guarantee Corporation   | Sidley Austin LLP  | Attn: Jeffrey Bjork, Esq. & Eric D. Tashman, Esq.                      | etashman@sidley.com;<br>jbjork@sidley.com   |
| Counsel for National Public Finance Guarantee Corporation   | Sidley Austin LLP  | Attn: Guy S. Neal, Esq.  | gneal@sidley.com  |
| Counsel for National Public Finance Guarantee Corporation   | Sidley Austin LLP  | Attn Guy S Neal  | gneal@sidley.com  |
| Counsel for National Public Finance Guarantee Corporation   | Sidley Austin LLP  | Attn James F Bendernagel   | jbendernagel@sidley.com   |
| Counsel for National Public Finance Guarantee Corporation   | Sidley Austin LLP  | Attn Jeffrey E Bjork   | jbjork@sidley.com   |
| Counsel for Retired Detroit Police and Fire Fighters Association ("RDPFFA"); 2) Donald Taylor, President of RDPFFA; 3) Detroit Retired City Employees Association ("DRCEA"); and 4) Shirley V. Lightsey, President of DRCEA | Silverman & Morris PLLC  | Thomas R Morris and Karin F. Avery                                     | morris@silvermanmorris.com;<br>avery@silvermanmorris.com  |
| Counsel for Unisys Corporation  | Sirlin Lesser & Benson PC  | Dana S Plon  | dplon@sirlinlaw.com   |
| Counsel for Airgas USA LLC  | Smith Katzenstein & Jenkins LLP  | Kathleen M Miller  | kmiller@skjlaw.com  |
| State of Michigan Chief Legal Counsel   | State of Michigan Chief Legal Counsel  | Matthew Schneider  | Schneiderm7@michigan.gov  |
| State of Michigan Assistant Attorney General, Counsel to State of Michigan  | State of Michigan Revenue & Collections Division   | Steven B Flancher & Matther Schneider                                  | flanchers@michigan.gov;<br>schneiderm7@michigan.gov   |
| The Office of the Treasurer for the State of Michigan   | State Treasurer  |  | MIStateTreasurer@michigan.gov   |
| Counsel for Nuveen Asset Management and BlackRock Financial Management, Inc.; and Greenhill & Co LLC  | Steinberg Shapiro & Clark  | Mark H Shapiro   | shapiro@steinbergshapiro.com  |
| Counsel for Gabriel, Roeder, Smith & Company; Clark Associates, Inc.  | Stevenson & Bullock PLC  | Charles D Bullock Elliot G Crowder Sean M Walsh & Michael A. Stevenson | cbullock@sbplclaw.com;<br>ecrowder@sbplclaw.com;<br>swalsh@sbplclaw.com;<br>mstevenson@sbplclaw.com                               |
| Counsel for the Detroit Police Lieutenants and Sergeants Association  | Sudnick Law PC   | Peter P Sudnick  | psudnick@sudnicklaw.com   |
| Counsel for Syncora Guarantee Inc   | Susheel Kirpalani Quinn Emanuel Urquhart & Sullivan, LLP   |  | susheelkirpalani@quinnemanuel.com   |
| Sylvia Jean Brown Jones, Pro Se   | Sylvia Jean Brown Jones  |  | bjdelta55@gmail.com   |
| Union Representative  | Teamsters Local #214   | Attn: Joseph Valenti   | tl214teams@teamsters214.org   |
| Counsel for Public Lighting Authority   | The Allen Law Group, P.C.  | Attn: Ron Liscombe, Esq.   | rliscombe@alglawpc.com  |
| City's Secured & Unsecured Bonds  | The Bank of New York Mellon Trust Company, National Association, as trustee  | Attn: Eduardo Rodriguez  | eduardo.rodriguez@bnymellon.com   |
| Corporation Counsel for the City of Detroit   | The City of Detroit  | Attn: Corporation Counsel  | Johnsoncu@detroitmi.gov   |
| Counsel for Kevin Lewis & Jeremy Morris   | The Markowitz Law Office   | Carolyn B Markowitz PC   | bankruptcy@markowitzlegal.com   |
| Counsel for Michigan Council 25 of the American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO   | The Sanders Law Firm PC  | Herbert A Sander   | hsanders@miafscme.org   |
| Counsel for Michigan Auto Recovery Service Inc; Wayne County Circuit Court, Hyde Park Cooperative, et al. v. City of Detroit, by and through its Buildings and Safety Engineering Department, Case No. 10-005687-CZ         | Thornbladh Legal Group PLLC  | Kurt Thornbladh  | kthornbladh@gmail.com;<br>thornbladh.kurt3@gmail.com  |
| Counsel for City of Detroit, Michigan   | Togut Segal & Segal LLP  | Attention: Albert Togut, Scott E. Ratner & Neil Berger                 | seratner@teamtogut.com;<br>neilberger@teamtogut.com;<br>dperson@teamtogut.com;<br>adeering@teamtogut.com;<br>dcahir@teamtogut.com |
| Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water)  | U.S. Bank National Association, as trustee, bond registrar transfer agent, paying agent, custodian and/or contract administrator | Attn: Susan T. Brown   | susan.brown5@usbank.com   |
| Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water)  | U.S. Bank National Association, as trustee, bond registrar transfer agent, paying agent, custodian and/or contract administrator | Attn: Susan E. Jacobsen VP   | susan.jacobsen2@usbank.com  |
| Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water Bonds)  | U.S. Bank National Association, as trustee, for the Detroit Sewer and Water Bonds  | Attn: Lawrence J. Bell   | lawrence.bell@usbank.com  |
| Union Representative  | UAW - Local # 412  | Attn: John Cunningham  | jcunningham@uaw.net   |
| Union Representative  | UAW - Local #212   | Attn: John Cunningham  | jcunningham@uaw.net   |
| Union Representative  | UAW - PAA Local #2211  | Attn: Robyn Brooks   | BrooR@detroitmi.gov   |
| Union Representative  | UAW - WWTP Local #2200   | Attn: Laurie Stuart  | mimilaurie@yahoo.com;<br>ltownse@detroitpubliclibrary.org   |
| Union Representative  | United Auto Workers Union  | Attn: Michael Nicholson  | mnicholson@nichfeld.com   |
| Counsel for United States of America  | Unites States Attorney   | Julia A. Caroff, Assitant US Attorney                                  | julia.caroff@usdoj.gov  |
| Union Representative  | Utility Workers Union of America   | Attn: James Harrison   | jharrison@uwua.net  |

**Exhibit A**  
**Served via Email**

| Party Description   | Company                                     | Contact  | Email  |
|---|---|--|--|
| Union Representative  | Utility Workers Union of America Local #488 | Attn: Carl Anderson  | canderson@dwsd.org   |
| Union Representative  | Utility Workers Union of America Local #504 | Attn: Curlisa Jones  | mcqueen@dwsd.org   |
| Union Representative  | Utility Workers Union of America Local #531 | Attn: Samuel Wilson  | swilson@dwsd.org   |
| Counsel for Center for Community Justice and Advocacy ("CCJA")                      | Vanessa G. Fluker, Esq., PLLC               | Vanessa G Fluker   | vgflawyer@sbcglobal.net  |
| Interested Party  | Vanguardians                                | Barry Allen  | pra@vanguardians.org   |
| Counsel for U.S. Bank National Association (Top 20 Creditor)                        | Waller Lansden Dortch & Davis LLP           | Attn: Courtney Rogers  | courtney.rogers@wallerlaw.com                                      |
| Counsel for UBS AG and Merrill Lynch Capital Services Inc (COP Swap Counterparties) | Warner Norcross & Judd LLP                  | Douglas A Dozeman & Charles N Ash Jr                         | ddozeman@wnj.com;<br>cash@wnj.com                                  |
| Counsel for Financial Guaranty Insurance Company                                    | Weil, Gotshal & Manges LLP                  | Alfredo R Perez  | alfredo.perez@weil.com   |
| Counsel for Financial Guaranty Insurance Company                                    | Weil, Gotshal & Manges LLP                  | Attn: Gary T. Holtzer, Esq. & Alfredo R. Pérez, Esq.         | gary.holtzer@weil.com;<br>alfredo.perez@weil.com                   |
| Counsel for Financial Guaranty Insurance Company                                    | Weil, Gotshal & Manges LLP                  | Kelly DiBlasi  | kelly.dibiasi@weil.com   |
| Counsel for Financial Guaranty Insurance Company                                    | Williams Williams Rattner & Plunkett PC     | Ernest J Essad Jr  | ejessad@wwrplaw.com  |
| Counsel for Assured Guaranty Municipal Corporation                                  | Winston & Strawn LLP                        | Attn: Lawrence A. Larose Samuel S. Kohn<br>Carrie V. Hardman | llarose@winston.com;<br>skohn@winston.com;<br>chardman@winston.com |
| Counsel for Assured Guaranty Municipal Corporation                                  | Winston & Strawn LLP                        | Sarah T. Foss  | sfoss@winston.com  |
| Counsel for The Bank of New York Mellon   | Wolfson Bolton PLLC                         | Scott A Wolfson & Anthony J Kochis                           | swolfson@wolfsonbolton.com;<br>akochis@wolfsonbolton.com           |
| Counsel for International Association of Fire Fighters, AFL-CIO, CL                 | Woodley & McGillivray                       | Douglas L Steele   | dls@wmlaborlaw.com   |

# **EXHIBIT B**

**Exhibit B**  
**Served via First Class Mail**

| Party Description                                   | Company   | Contact                               | Address 1                          | Address 2                 | City             | State | Zip        |
|---|---|---------------------------------------|------------------------------------|---------------------------|------------------|-------|------------|
| Union Representative                                | AFSCME Local #0023                                | Attn: Robert Stokes                   | 600 W. Lafayette, Ste. 134         |                           | Detroit          | MI    | 48226      |
| Union Representative                                | AFSCME Local #0312                                | Attn: Phillip Douglas                 | 14022 Linwood                      |                           | Detroit          | MI    | 48238      |
| Union Representative                                | AFSCME Local #0457                                | Attn: Laurie Walker                   | 600 W. Lafayette, Ste. L – 104     |                           | Detroit          | MI    | 48226      |
| Union Representative                                | AFSCME Local #1642                                | Attn: Gina Thompson-Mitchell          | 600 W. Lafayette, Ste. L – 123     |                           | Detroit          | MI    | 48226      |
| Counsel for Kajj Development                        | David W Yaldo PC                                  | David W. Yaldo                        | 4036 Telegraph Road, Suite 204     |                           | Bloomfield Hills | MI    | 48302      |
| Retiree Representative                              | Detroit Firemen's Fund Association                | Attn: Kim Fett                        | 1301 Third St. Suite 329           |                           | Detroit          | MI    | 48226      |
| Retiree Representative                              | Detroit Police Benefit and Protective Association | Attn: Delbert R. Jennings, Sr.        | 3031 W. Grand Boulevard, Suite 405 |                           | Detroit          | MI    | 48202      |
| Union Representative                                | Field Engineers Association                       | Attn Larry Hart                       | PO Box 252805                      |                           | West Bloomfield  | MI    | 48325      |
| The Office of the Governor of the State of Michigan | Governor Rick Snyder                              |                                       | P.O. Box 30013                     |                           | Lansing          | MI    | 48909      |
| Counsel for IBM Credit LLC                          | IBM Credit LLC                                    | Andy Gravina                          | Special Handling Group MD NC317    | 6303 Barfield Rd NE       | Atlanta          | GA    | 30328      |
| Pro se  | Nathaniel Brent                                   |                                       | 538 S Livernois                    |                           | Detroit          | MI    | 48209      |
| Office of the United States Trustee                 | Office of the United States Trustee               | Daniel McDermott                      | 211 West Fort Street Suite 700     |                           | Detroit          | MI    | 48226      |
| Interested Party                                    | Ricoh USA Inc                                     | Recovery & Bankruptcy Group           | 3920 Arkwright Rd Ste 400          |                           | Macon            | GA    | 31210      |
| SEC   | Securities & Exchange Commission                  | Bankruptcy Section                    | 175 W Jackson Blvd                 | Suite 900                 | Chicago          | IL    | 60604-2815 |
| The City, c/o the Emergency Manager                 | The City of Detroit                               | Attn: Kevyn D. Orr, Emergency Manager | Coleman A. Young Municipal Center  | 2 Woodward Ave Suite 1126 | Detroit          | MI    | 48226      |

# **EXHIBIT C**



**Exhibit C**

| CreditorName       | CreditorNoticeName                            | Address1                       | Address2                         | City            | State | Zip   |
|--------------------|---|--------------------------------|----------------------------------|-----------------|-------|-------|
| Belinda F. Ellis   |   | 14503 E 12 Mile Rd Apt B       |                                  | Warren          | MI    | 48088 |
| Curry, Jacqueline  |   | 850 Whitmore, Apartment 201    |                                  | Detroit         | MI    | 48203 |
| Curry, Jacqueline  | Richard J. Ehrlich, Attorney at Law           |                                | 23077 Greenfield Road, Suite 557 | Southfield      | MI    | 48075 |
| Evans, Mary Ann    |   | 621 Orleans Apt 65             |                                  | Detroit         | MI    | 48207 |
| Gardner, Edward D. |   | 18016 Harlow                   |                                  | Detroit         | MI    | 48235 |
| Gardner, Edward D. | Richard J. Ehrlich, Attorney at Law           |                                | 23077 Greenfield Road, Suite 557 | Southfield      | MI    | 48075 |
| Scott, Leandra     | Michael J. Cantor                             | 5636 Casmere                   |                                  | Warren          | MI    | 48092 |
| Scott, Leandra     | Paskel, Tashman, & Walker, PC                 | Attn Michael J. Cantor         | 24445 Northwestern, Suite 102    | Southfield      | MI    | 48075 |
| Theodore Andre     | Thomas Andre Legal Guardian of Theodore Andre | 14444 Towering Oaks            |                                  | Shelby Township | MI    | 48315 |
| Vaughn, Tamiko     | Robert A. Canner, P.C.                        | 24423 Southfield Rd., Ste. 200 |                                  | Southfield      | MI    | 48075 |

## **Exhibit B**

**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

**ORDER GRANTING DEBTOR'S FIFTY-FIRST OMNIBUS OBJECTION  
TO CERTAIN CLAIMS**

**(Workers' Compensation Claims Not Subject to the Claims Process in this  
Bankruptcy Case)**

Upon review of the fifty-first objection to claims (the "Objection"),<sup>1</sup> of the Debtor, City of Detroit, Michigan (the "City"), seeking entry of an order disallowing and expunging each of the claims listed on Exhibit 2 to the Objection; and it appearing that this Court has jurisdiction over the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and Article VII of the Plan; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Objection in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that the relief requested in the Objection is in the best interests of the City, and its creditors; and due and proper notice of the Objection having been given as provided in the Objection; and it appearing that no other or further notice of the Objection need be

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Objection.

given; and a hearing on the Objection having been held before the Court; and any objections or other responses to the Objection having been overruled or withdrawn; and the Court finding that the legal and factual bases set forth in the Objection and at the hearing establish just cause for the relief granted; and after due deliberation and good and sufficient cause appearing therefore;

IT IS ORDERED that:

1. The Objection is sustained.
2. Each of the proofs of claim listed on Exhibit 2 annexed to the Objection is hereby disallowed and expunged in its entirety, pursuant to Section 502(b) of the Bankruptcy Code.
3. The City's claims agent is authorized to update the claims register to reflect the relief granted in this Order.
4. The City is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.
5. Each claim and the objections by the City to each claim as addressed in the Objection and set forth in Exhibit 2 constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed and constitute a separate order with respect to each such claim and, to the extent necessary under Bankruptcy Rules 7054 and 9014, constitutes a final judgment with respect to such claim, and the Court expressly determines that there is no just

reason for delay of the entry of the final judgment with respect to such claim. Any stay of this Order shall apply only to the contested matter that involves such creditor and for which such stay has been granted or may be in effect, and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby, and further provided that the City shall have the right, but not the need, to submit a separate order with respect to contested matters or claims.

6. The City retains all of its rights to object, on any other basis, to any of the Claims identified on Exhibit 2.

7. Notice of the Objection as provided therein is good and sufficient notice of such objection, and the requirements of Bankruptcy Rule 3007(a) and the local rules of the Court are satisfied by such notice.

8. Nothing in this Order is intended to, shall constitute or shall be deemed to constitute the City's consent, pursuant to section 904 of the Bankruptcy Code, to this Court's interference with (a) any of the political or governmental powers of the City, (b) any of the property or revenues of the City or (c) the City's use or enjoyment of any income-producing property.