

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

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| <hr/> In re:<br><br>City of Detroit Michigan<br><br>Debtor | Bankruptcy Case No. 13-53846<br><br>Judge Thomas J. Tucker<br><br>Chapter 9 |
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**EDITH WOODBERRY'S RESPONSE TO DEBTOR'S FIFTY-SIXTH  
OMNIBUS OBJECTION TO CERTAIN CLAIMS**

Claimant Edith Woodberry in pro per, (Edith) RESPONSE; SHE filed her CLAIM against Debtor City of Detroit (City), in Bankruptcy Court; Case Number 2846 Bankruptcy Court's Hon. Judge Rhodes is assigned judge. Edith has not been assigned or been before any of the other Bankruptcy Judges.

Within eight years the City has used its Eminent Domain Power; in at least four different Court Actions to seize Edith's property without paying her just compensation. During this period the City refused to issue her requested PERMITS to correct the many VIOLATIONS the City is required by law to issue permits to correct.

After refusing to grant permits, the City demolished Edith's property as unsafe. Said property was an 18 unit Apartment Building with 9, two (2) bedroom units; 9 three (3) bedroom units; three (3) commercial units and a subbasement. It stood on a prime corner. Its address was 2457 Beaubien St / 445 Fisher Freeway. Edith has not been paid just compensation to date for the City's "taking." Payment of just compensation is mandated by both Federal and State Constitutions.

Between times, Edith filed a \$2,000,000, lien later raising it to \$3,000,000 lien on her property. The City's last Case against Edith in the Third Judicial Circuit Court; her Case is still



open. This Case was assigned to Hon. Judge Isidore S Torres, who later reassigned it to the Hon. Judge Daphne Curtis Means, who has retired.

City's attorney, Charles Raimi, (pursuant to 28 U.S.C 1746,) declared under penalty of perjury that the following is true and correct to the best of my (his) knowledge and belief, I am Deputy Corporation Counsel for the City of Detroit ("City"). Unless otherwise stated in his Declaration, I have personal knowledge of the facts set forth herein. The City's ongoing claims reconciliation process involves the collective effort of a team of employees assembled from personnel specifically familiar with the operations and liabilities of the City. This team worked together and in conjunction with City's counsel, the City's financial advisor, and the City's claims agent, to review proofs of claim filed against the City. (the "Objection"), the City reviewed the claims at issue as described on EXHIBIT 2 of the Objection. Each claimant has abandoned and failed to prosecute his or her claim.

Edith Woodberry is named in Exhibit 2.] Edith has not abandoned her Claim. Raimi's Declaration is ~~do~~ <sup>is</sup> ~~not~~ <sup>not</sup> ~~correct~~ <sup>correct</sup>. Consequently, each claim on Exhibit 2 should be disallowed and expunged pursuant to the ADR Order (as defined in the Objection).

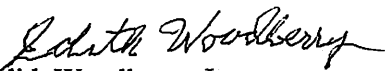
A city attorney (name I do not recall) met with me at the of City's attorney 's office located in the City Country Building to Settle my Case at his request. He became upset when it became apparent to him that the City had wronged me. Faced with the truth, his integrity and the Code of Ethics would not let him continue after he saw what he saw in the City's file.

He was openly distraught. He left the conference in a huff, saying that he was going on vacation – and to "Let Dave handle it." Dave, whomever he is, has not contacted me to date.

Wherefore, Edith prays that the Bankruptcy Court will ORDER the City (DEBTOR) to provide her with a complete copy of the documentation in her Case File, at no cost to her. or no

Edith also pray that this Court will deny City's request for an Order Sustaining Debtor's Sixty-Second Omnibus Objection to in its Exhibit 2 as it relates to her; Claimant Edith Woodberry.

Respectfully submitted,

  
Edith Woodberry, In pro per

# Affidavit

I, Edith Woodberry, do hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief.

1. I am the owner of the property that the City took by eminent domain and is now attempting to have the City's obligation to pay just compensation discharged in bankruptcy.

2. Shortly after this court upheld my objection to the discharge of the City's obligation to pay just compensation, an attorney representing the City of Detroit approached me regarding negotiations to settle this claim.

3. I met with the City's attorney in person at his office for preliminary negotiation and document exchange.

4. During this meeting, the City attorney informed me that in approximately one week he would no longer be working for the City and that his successor would contact me regarding further negotiation and settlement.

5. To date, no one from the City of Detroit Law Department has contacted me regarding further negotiation and settlement.

6. No one has been identified as the successor attorney.

7. I have not abandoned my claim or refused to negotiate with the City.

8. I attempted to review the bankruptcy file to provide further proof. The bankruptcy clerk told me that the file could not be accessed because the file was under the exclusive control of the City of Detroit's attorney.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true, and correct to the best of my knowledge and belief.

Subscribed and sworn to  
before me on May 16, 2018

Candy Foster  
Notary Public, State of MI  
County of Wayne

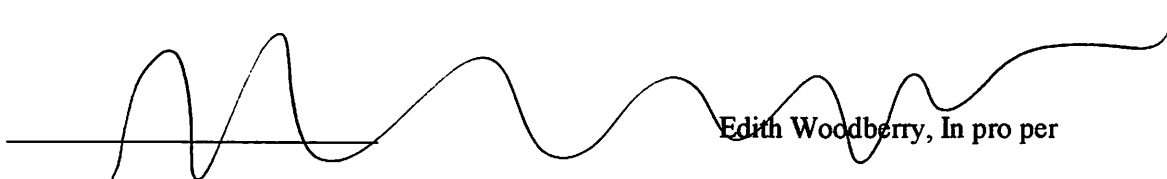
My Commission Expires 12/27/2022

Acting in County of Wayne

Edith Woodberry

Respectfully submitted,

Candy Foster



Edith Woodberry, In pro per

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of Response to Debtor's Sixty-Second  
Omnibus Objection to Certain Claims, Edith Woodberry's Response to Debtor's Fifty-Sixth

omnibus Objection to Certain Claims and Declaration /Affidavit of Edith Woodberry were hand delivered to Charles N. Rami, Esq. and filed with the United States Bankruptcy Court, Eastern District of Michigan, Southern Division on May 16, 2018.

Edith Woodberry