

**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 MOTION FOR THE ENTRY OF AN ORDER  
ENFORCING THE CONFIRMATION ORDER AND BAR DATE ORDER  
AGAINST TWW EMPLOYMENT SOLUTIONS, LLC**

On September 25, 2018, the City Of Detroit (“City”) filed its *Motion for the Entry of an Order Enforcing the Confirmation Order and Bar Date Order Against TWW Employment Solutions, LLC* (“Motion”). [Doc. No. 12905]. The Motion was served upon counsel for TWW Employment Solutions, LLC via first class mail. *See Certificate of Service* Exhibit A.

On October 12, 2018, counsel for the City received an email from Anthony Adams, counsel for TWW Employment Solutions, LLC, which contained a response to the Motion, however no response has been filed with the Court.

As such, no response to the Motion has 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 Motion. *See Proposed Order* Exhibit B.



Respectfully submitted,

By: /s/ Marc N. Swanson

Marc N. Swanson (P71149)

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Attorneys for the City of Detroit

DATED: October 16, 2018

## **Exhibit A**

**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 hereby certifies that on September 25, 2018, he filed the *City of Detroit's Motion for the Entry of an Order Enforcing the Bar Date Order and Confirmation Order Against TWW Employment Solutions, LLC* ("Motion") using the court's CM/ECF system which provided notice of the filing to all registered participants in this matter. The undersigned further certifies that on the same day, a copy of the Motion was served upon the following via United States mail:

Anthony Adams  
7650 2nd Ave, Suite 113  
Detroit, MI 48202

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

September 25, 2018

## **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 THE CITY OF DETROIT’S MOTION FOR THE  
ENTRY OF AN ORDER ENFORCING THE  
BAR DATE ORDER AND CONFIRMATION ORDER  
AGAINST TWW EMPLOYMENT SOLUTIONS, LLC**

This matter, having come before the Court on the *City of Detroit’s Motion for the Entry of an Order Enforcing the Bar Date Order and Confirmation Order Against TWW Employment Solutions, LLC* (the “Motion”)<sup>1</sup>, 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. TWW must dismiss or caused to be dismissed with prejudice the City of Detroit and the Workforce Development Department from case number 18-009704-CK currently pending in the Circuit Court for the County of Wayne (“State Court Case”).

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<sup>1</sup> Capitalized terms used but not otherwise defined in this Order shall have the meanings given to them in the Motion.

3. The City is awarded its reasonable attorneys' fees and costs expended in conjunction with this Motion and the State Court Case.

4. The City must file and serve on counsel to TWW an itemization of its attorneys' fees and costs expended in conjunction with the Motion and the State Court Case within 14 days after the entry of this Order.

5. TWW must file any objection to such itemization no later than 14 days after it is served with the City's itemization.