# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION 

In re:
CITY OF DETROIT, MICHIGAN
Chapter: 9
Case No.: 13-53846

Debtor(s)
Judge: THOMAS J. TUCKER

RAYMOND THOMPSON JR., AND TAESEAN PARNEL
a minor by his next friend CORLISS THOMAS

Creditor(s)

CREDITORS MOTION FOR RECONSIDERATION AND/OR FOR RELIEF FROM JUDGMENT OF THE ORDER GRANTING DEBTOR CITY OF DETROIT'S MOTION TO EXCLUDE CREDITOR RAYMOND THOMPSON JR. FROM DISBURSEMENT DESPITE TIMELY SUBMISSION OR ALTERNATIVE RELEASE FROM ORDER

Now comes Creditor Raymond Thompson Jr. by and through his undersigned counsel,

ROMANO LAW, P.L.L.C., and for their Motion for Reconsideration of the Order Granting Debtor's Motion to Exclude Creditor Raymond Thompson Jr. from Disbursement Despite

Timely Submission would aver unto this Honorable Court as follows:

1. On or around March 16, 2022, the Debtor's filed a Motion for an Order (a) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under The City's Plan of Adjustment and (B) Granting Other Related Relief. (Exhibit A)
2. On or around March 16, 2022, the Debtor's filed a notice of Opportunity to Object to City of Detroit's Motion for an Order (a) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under The City's Plan of Adjustment and (B) Granting Other Related Relief. (Exhibit B)
3. That on May 25, 2021, Creditor's Raymond Thompson Jr., Gregory Brazell and Taesean Parnel a minor by his next friend Corliss Thomas completed and mailed together in one envelope via FedEx Overnight the requested documents: Brokerage Account and Direction and W-9 forms. (Exhibit C)
4. That on Wednesday, May 26, 2021, at 10:03 am the requested documents for Creditor's Raymond Thompson Jr., Gregory Brazell and Taesean Parnel a minor by his next friend Corliss Thomas were delivered and signed for by M. Torres. (Exhibit C)
5. That Creditor Taesean Parnel a minor by his next friend Corliss Thomas is included in the distribution of the New B notes to Claimants. (Exhibit D)
6. That Creditor Raymond Thompson Jr. is being excluded from his claim for failure to timely return brokerage and tax information documents when in fact his documents were submitted in a timely fashion and were included in the FedEx Envelope with Gregory Brazell and

Taesean Parnel a minor by his next friend Corliss Thomas. Three Creditor's documents were sent together, resulting in all three being received. (Exhibit E)
7. On or around May 20, 2022, the Debtor's filed a Certification of No Response or Objection Regarding City of Detroit's Motion for an Order (a) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief to include Creditor Raymond Thompson Jr. (Exhibit F)
8. On or around May 20, 2022, the Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief was signed by Judge Thomas J. Tucker. (Exhibit G)
9. The Creditor's attorney's office received the resignation of one of its attorney's, this resignation occasioned some chaos, which led to the Creditor's attorney failure to furnish a response to the Debtor's Notice of Opportunity to Object to City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (b) Granting Other Related Relief in a timely fashion.
10. Had the Creditor's attorney filed a timely response to the Debtor's motion, this Honorable Court's decision would likely have been different.
11. Under Rule 60 sub (a)(b) this court may grant relief from a judgment or order for reasons of mistake, inadvertence, surprise, or excusable neglect.
12. Under Rule 60 sub (c)(d) this court has the power to entertain the relieve from a judgment, order or proceeding.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court grant the Creditor's Motion for Reconsideration or Alternative Release Creditor's from Order as herein submitted.

> Respectfully submitted,

ROMANO LAW, PLLC

By: /s/ Daniel G. Romano<br>DANIEL G. ROMANO (P49117)<br>ROMANO LAW, PLLC<br>Attorneys for Plaintiff<br>23880 Woodward Avenue<br>Pleasant Ridge, MI 48069<br>(248) 750-0270

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

## CITY OF DETROIT'S MOTION FOR AN ORDER (A) APPROVING FIRST AND FINAL DISTRIBUTION OF NEW B NOTES TO HOLDERS OF ALLOWED CLASS 14 CLAIMS UNDER THE CITY'S PLAN OF ADJUSTMENT AND (B) GRANTING OTHER RELATED RELIEF

The City of Detroit ("City") moves this Court for entry of an order approving its first and final Distribution of New B Notes to Holders of Allowed Class 14 Claims and granting other related relief ("Motion"). In support, the City respectfully states as follows.

## I. INTRODUCTION

The City's Plan ${ }^{1}$ states that each Holder of an Allowed Class 14 Claim will receive a Pro Rata Distribution of New B Notes. Previously, the City moved for, ${ }^{2}$

[^0]and this Court established by order, ${ }^{3}$ procedures for gathering the tax and account information necessary for the City to Distribute New B Notes to Holders of Allowed Class 14 Claims under the Plan. The City also moved for, ${ }^{4}$ and this Court approved, ${ }^{5}$ procedures for handling Distributions that are unsuccessful on the first attempt. With these procedures in place, the City is now prepared to make its first and final Distribution of New B Notes to Holders of Allowed Class 14 Claims.

When a date is selected for making Distributions on Claims, the Plan requires the City to file with the Court a notice informing interested parties of that date and of the planned Distribution ("Distribution Notice"). See Plan, Art. VI.F, p. 65. This Motion accompanies the Distribution Notice, which is attached as Exhibit 6-A. The Distribution Notice provides that on or about May 9, 2022, the City plans to begin Distributing New B Notes to Holders of Allowed Class 14 Claims. Attached to this Motion as Exhibit 6-B is a list of the Holders of Allowed Class 14 Claims that will receive a Distribution, including the amount of each Claim and the amount of Series

[^1]2014B-1 and Series 2014B-2 notes to be Distributed to the Claim Holder in respect of each Claim. Also attached to this Motion, as Exhibit 6-C, is a list of formerly Allowed Class 14 Claims that have subsequently been disallowed and expunged under the Brokerage Order because the Holders failed to timely provide the necessary tax and brokerage account information required by the Brokerage Order.

The City files this Motion to give interested parties the opportunity to review the planned Distribution and to timely raise any concerns they may have or be permanently and forever barred, estopped, and enjoined from raising any objection to the proposed first and final Distribution or asserting any Class 14 Claim against the City or any of its property. The City selected May 9, 2022, as the planned Distribution Date to allow time for notice of this Motion and entry of the proposed order granting this Motion, should the Court determine that it can be entered without a hearing. Should a hearing be scheduled, the City may ask the Court to revise the planned Distribution Date to provide time for the hearing and ruling to occur.

The City respectfully asks the Court to enter an Order substantially in the form attached as Exhibit 1. The proposed Order expressly finds that the Distribution Notice provided in connection with this Motion is sufficient and satisfies the City's obligation to File a notice of the upcoming Distribution Date under the Plan. The Order also finds that Exhibit 6-B properly identifies all of Holders of Allowed Class 14 Claims to whom Distributions are to be made, the correct Pro Rata Distribution
of B Notes to each, and that, unless expressly identified on Exhibit 6-B, no Holder of a Class 14 Claim will be entitled to any Distribution, whether from the New B Notes, the City, or any property of the City. ${ }^{6}$ The proposed Order also finds that by making this planned Distribution of New B Notes, the City is properly complying with its obligations under the Plan to Distribute New B Notes to Holders of Allowed Class 14 Claims. Finally, after making this planned Distribution, there will be $\$ 124$ in principal amount of New B Notes remaining, which is an amount too small to be Distributed under the Plan. The Order approves this small or stub amount of New B Notes reverting to the City and becoming property of the City.

## II. JURISDICTION AND VENUE

1. This Court has jurisdiction over this Motion under 28 U.S.C. §§ 157 and 1334 and the Plan. This Court retained jurisdiction in this case to "[e]nsure that Distributions to Holders of Allowed Claims are accomplished pursuant to the provisions of the Plan." Plan, Art. VII.D, p. 70. This is a core proceeding under 28 U.S.C. § $157(\mathrm{~b})(2)(\mathrm{A})$ and ( O ). Venue is proper before this Court under 28 U.S.C. § 1409.
[^2]
## III. BACKGROUND

2. On October 22, 2014, the City filed its Plan. This Court entered an order confirming it on November 12, 2014 ("Confirmation Order," Doc. No. 8272). The Plan became effective December 10, 2014 ("Effective Date").
3. Class 14 of the Plan classifies and describes the treatment of "Other Unsecured Claims."
4. The Plan states that "each Holder of an Allowed Other Unsecured Claim [. . .] shall receive (A) [. . .] a Pro Rata share of approximately $\$ 16.48$ million in New B Notes and (B) distributions in accordance with Section II.B.3.p.i.A." Plan, Art. II.B.3.u.i, p. 44.
5. Article II.B.3.p.i.A adds approximately $\$ 4.12$ million in additional New B Notes to the $\$ 16.48$ million to be Distributed to Holders of Allowed Other Unsecured Claims, for a total of approximately $\$ 20.6$ million in New B Notes. Plan, Art. II.B.3.p.i.A, 2nd para., part (3), p. 37.
6. On the Effective Date, the City issued New B Notes. It allocated an aggregate principal amount of $\$ 20,596,747$ of New B Notes to Holders of Allowed Other Unsecured Claims in Class 14. These New B Notes consist of Series 2014B1 notes in the principal amount of $\$ 20,376,922$ ("2014B-1 Notes") and Series 2014B-2 notes in the principal amount of $\$ 219,825$ ("2014B-2 Notes" and, with the

2014B-1 Notes, "B Notes"). ${ }^{7}$ Since that time, interest has accrued and will continue to accrue on the B Notes.

## A. The Disbursing Agent

7. Also, on the Effective Date, and in accordance with Article V.A. of the Plan, the City and the City's Disbursing Agent, U.S. Bank National Association ("Disbursing Agent"), entered into the Class 14 Disbursing Agent Agreement ("Disbursing Agreement"). Plan, Article V.A, p. 64. All Distributions of B Notes and accrued interest thereon are held by the Disbursing Agent under the Disbursing Agreement and the Plan.
8. The Disbursing Agent holds the B Notes to be Distributed under this proposed first and final Distribution. Interest that has accrued on the B Notes will be paid to the Holders of the B Notes at a future date or dates by the Disbursing Agent.
9. The Plan requires the Disbursing Agent to Distribute B Notes to creditors in whole dollar amounts; fractional amounts must be rounded down. Plan, Art. V.I.3, p. 66 ("No fractional New Securities shall be distributed. Where a fractional portion of a New Security otherwise would be called for under the Plan, the actual issuance shall reflect a rounding down to the nearest whole New
[^3]Security."); Plan, Art. I.A.256, p. 21 (defining "New Securities" to include "New B Notes"); see also Disbursing Agreement, 『1 2(e), p. 5 (requiring Disbursing Agent to Distribute B Notes to creditors in "multiples of \$1.00"). Because of this rounding, a very small amount of undistributable B Notes will remain after the Distribution.

## B. The Brokerage Order

10. The Disbursing Agent required tax and brokerage account information to make Distributions of B Notes to Holders of Allowed Class 14 Claims.
11. The Brokerage Order sets forth procedures for the City to request and receive the tax and brokerage account information necessary to Distribute B Notes. Holders of eighty (80) ${ }^{8}$ Allowed Class 14 Claims who timely returned this information will receive B Notes in the first and final Distribution of B Notes. This will be the only Distribution of B Notes and no B Notes will be reserved or otherwise held back by the Disbursing Agent for future or additional Distributions under the Plan or otherwise.
12. Holders of Allowed Class 14 Claims who did not comply with the Brokerage Order have waived their Class 14 Claims and will not receive a
[^4]Distribution. Brokerage Order, ๆ 6. Instead, the Distributions that would have been made on these Claims are abandoned and will become property of the City. Id.
13. For additional context, Holders representing $96 \%$ of Allowed Class 14 Claims have returned proper information. Claims representing approximately 4\% of B Notes and interest have been disallowed and expunged due to failure to comply with the Brokerage Order. Exhibit 6-C, p. 3.

## C. The Distribution Procedures Order

14. The Disbursing Agent informed the City that it is possible that some Distributions may not be successful for various reasons.
15. To prepare for this possibility, on November 24, 2021, the City filed the Procedures Motion, which the Court granted by entering the Procedures Order.
16. The Procedures Order established procedures for resolving issues that may arise during Distribution. If a Distribution of B Notes to a Holder of an Allowed Class 14 Claim fails or is otherwise unsuccessful, then the Procedures Order governs how that Distribution may be reattempted. The Procedures Order will remain in full force and effect.

## D. The Disputed Unsecured Claims Reserve

17. In preparation for the Distribution discussed in this Motion, the City filed its Notice of Calculation and Elimination of Current Disputed Unsecured Claims Reserve ("Reserve Notice") contemporaneously with this Motion.
18. The Reserve Notice assumes that the City's proposed Distribution has been correctly calculated and thus that it no longer needs a Disputed Unsecured Claims Reserve. Accordingly, the Reserve Notice reduces the Disputed Unsecured Claims Reserve to $\$ 0$. The Motion also seeks this Court's approval of a Disputed Unsecured Claims Reserve of $\$ 0$. Of course, should the Court not approve the City's proposed Distribution, the City may withdraw the Reserve Notice until it can address any concerns the Court may have with respect to the proposed Distribution.

## E. Notice provided to Class 14 Claimants.

19. The Plan requires that the City provide notice of the upcoming planned Distribution to Holders of Allowed Class 14 Claims. Plan, Art. VI.F, p. 65. This Motion, with its exhibits and with a copy of the Reserve Notice, will be served on all parties who potentially still held a Class 14 Claim when the Brokerage Motion was filed on September 17, 2019, or who have subsequently filed papers in this bankruptcy case alleging a Class 14 Claim. This includes Holders of all Class 14 Claims listed on Exhibits 6-B and 6-C attached to this Motion, along with additional parties whose Class 14 Claims were resolved but who will be served nonetheless out of an abundance of caution.
20. The Motion will also be served on all parties requesting notices listed on the Master Service List.
21. The Motion thus will be served broadly on all parties who potentially could be affected by the planned Distribution or who have requested notices in this bankruptcy case, even though the Plan only requires that the City "File" the notice of Distribution Date with the Court and does not require it to be served on any particular parties. Plan, Art. VI.F, p. 65; Plan, Art. I.A.200, p. 16 (defining "File" to mean filing with the Court but without requiring service of the document filed.)

## IV. DISTRIBUTION SUMMARY

22. On or about May 9, 2022, the Disbursing Agent will begin to Distribute ${ }^{9} \$ 20,376,922$ of 2014B-1 Notes and $\$ 219,825$ of 2014B-2 Notes to Holders of Allowed Class 14 Claims and will continue until completed.
23. To "provide[] information regarding the Distribution to be made," as required by Article V.F of the Plan, a schedule of Claims on which Distributions will be made and the calculation of the B Notes to be Distributed to each is attached as Exhibit 6-B to this Motion. No other alleged creditor or party in interest will receive a Distribution of B Notes then or at any later time.
24. Additionally, a list of former Holders of Class 14 Claims who did not comply with the Brokerage Order and thus have forfeited their Claims and their rights to Distributions in the City's bankruptcy case is attached as Exhibit 6-C. The

[^5]amount of B Notes that would have been provided to these Holders is shown on page 3 of Exhibit 6-B; it represents approximately $4 \%$ of the total B Notes otherwise available for Distribution. These Distributions are abandoned and will become City property.
25. Finally, due to the rounding required by the Plan and the Disbursing Agreement, B Notes in the principal amount of $\$ 124.00$ will not be Distributed. These cannot be Distributed and will revert to the City, becoming City property. Exhibit 6-B, p. 3; see also Plan, Art. V.I.3, p. 66; Plan, Art. I.A.256, p. 21; Disbursing Agreement, 『 1 (e), p. 5.

## V. RELIEF REOUESTED AND BASIS FOR RELIEF

26. The City seeks an order confirming that its planned Distribution of B Notes complies with Plan requirements in all respects and that, by the filing of this Motion, it has provided the "notice of Distribution Date" required by Article V.F of the Plan in the form of the Distribution Notice. Plan, p. 65.
27. The Plan provides that each Holder of an Allowed Class 14 Claim is to receive a Pro Rata share of approximately $\$ 16.48$ million in New B Notes plus a Pro Rata share of $\$ 4.12$ million in New B Notes, or a Pro Rata share of $\$ 20.6$ million in New B Notes in total. Plan, Art. II.B.3.u.i, p. 44; Plan, Art. II.B.3.p.i.A, 2nd para, part (3), p. 37. The City plans to Distribute B Notes in the total principal amount of $\$ 20,596,747$ on account of all Allowed Class 14 Claims, inclusive of Claims listed
on Exhibit 6-C that have been abandoned. The City asserts that this is the amount of B Notes required under the Plan and that there will be no more B Notes to Distribute.
28. The City has listed all of the Allowed Class 14 Claims on Exhibit 6-B and provided its calculation as to each such Claim's share of the total B Notes allotted. It has also provided its calculation as to the exact dollar amount of the principal of B Notes to which the City calculates each Claim is entitled, both of 2014B-1 Notes and 2014B-2 Notes.
29. No other alleged creditors or parties in interest will receive a Distribution of B Notes now or at any later time and they should be forever estopped, barred, and enjoined from seeking a Distribution of any Claim against the City or any of its property.
30. The Disputed Unsecured Claims Reserve will be permanently reduced to $\$ 0$, which should be approved by the Court.
31. The City has listed on Exhibit 6-C all Holders whose Claims are disallowed and expunged due to their failure to comply with the Brokerage Order.
32. The City's calculations, shown on Exhibit 6-B, explain why B Notes in the principal amount of $\$ 124$ will not be Distributed after the $\$ 20.6$ million in principal is Distributed. As there is no practical way to Distribute this $\$ 124$ in B

Notes to creditors, the City asks that it revert to the City and become property of the City.
33. The City has provided notice to all Holders of Allowed Class 14 Claims (and others) of the upcoming Distribution by the filing and service of this Motion as described in paragraphs 19-21 above and in the "Notice" section below. The Motion will be served on all Holders listed on Exhibits 6-B and 6-C, along with additional parties who at one point held or still allege to hold a Class 14 Claim and parties who filed for notice in the case.
34. In light of the notice previously provided to Holders of Allowed Class 14 Claims with respect to the Brokerage Motion, the Brokerage Order, and the Procedures Motion, the City asks that the Court find the notice provided in connection with this Motion sufficient with respect to this Motion and the first and final Distribution generally.
35. Because notice of this Motion has been provided both to Holders of Allowed Class 14 Claims and to those former Holders who failed to return tax or brokerage information in accordance with the directives of the Brokerage Order, the City asks that the Court find that Exhibit 6-B properly identifies the only Holders to
whom Distributions are to be made and the correct Pro Rata Distribution of B Notes to each. ${ }^{10}$

## VI. NOTICE

36. The City filed this Motion using the Court's electronic filing system, which sends notice of the filing to all ECF participants registered to receive notice in this bankruptcy case. The City's claims agent, KCC, will serve the Motion by first-class mail on all creditors and other parties in interest who originally received service of the Brokerage Motion (i.e., all creditors and parties in interest who were or, at the time, might have become Holders of Allowed Class 14 Claims), as well as those requesting notices listed on the Master Service List and those with unresolved papers on file concerning alleged Class 14 Claims. KCC will file a proof of service soon afterward.

## VII. CONCLUSION

WHEREFORE, the City respectfully requests that this Court enter an Order, substantially in the form attached as Exhibit 1, granting the relief requested and such other and further relief as this Court may deem just and proper.

[^6]
# CITY OF DETROIT LAW DEPARTMENT 

By: /s/Charles N. Raimi<br>Charles N. Raimi (P29746)<br>Mary Beth Cobb (P40080)<br>James Noseda (P52563)<br>Attorneys for the City of Detroit<br>2 Woodward Avenue, Suite 500<br>Detroit, Michigan 48226<br>Phone - (313) 224-4550<br>Email - raimic@detroitmi.gov<br>MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.<br>By: /s/ Marc N. Swanson<br>Marc N. Swanson (P71149)<br>Ronald A. Spinner (P73198)<br>150 West Jefferson, Suite 2500<br>Detroit, Michigan 48226<br>Phone - (313) 496-6420<br>Facsimile - (313) 496-8451<br>Email-swansonm@millercanfield.com<br>Counsel for the City of Detroit, Michigan

## EXHIBIT LIST

Exhibit $1 \quad$ Proposed Order
Exhibit 2 Notice of Motion and Opportunity to Object
Exhibit 3 N/A
Exhibit $4 \quad$ Certificate of Service
Exhibit 5 N/A
Exhibit 6-A Notice of First and Final Distribution and Distribution Date
Exhibit 6-B List of Planned Distributions to Holders of Allowed Class 14 Claims

Exhibit 6-C List of Holders of Allowed Class 14 Claims That Did Not Comply with the Brokerage Order and Whose Claims Have Been Disallowed and Expunged

## EXHIBIT 1

# 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 (A) APPROVING FIRST AND FINAL DISTRIBUTION OF NEW B NOTES TO HOLDERS OF ALLOWED CLASS 14 CLAIMS UNDER THE CITY'S PLAN OF ADJUSTMENT AND (B) GRANTING OTHER RELATED RELIEF

This matter having come before the Court on the City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief (the "Motion," Doc. No. [_] ${ }^{1}$; notice having been given by first-class mail to all known Holders of Class 14 Claims under the Plan and all creditors and other parties in interest who requested notice or alleged Class 14 Claims, and by ECF to all participants registered to receive notice in this bankruptcy case, and no further notice being necessary or required; no objections having been timely filed to the Motion; the Court being fully advised in the premises; and there being good and sufficient cause to grant the relief requested,

[^7]
## THE COURT FINDS THAT:

1. The filing and service of the Motion satisfies the City's obligation under the Plan to file a notice of the planned Distribution Date in all respects. No other or additional notice need be given.
2. Exhibit 6-B to the Motion contains a complete and exhaustive list of Allowed Class 14 Claims entitled to a Distribution under the Plan. These are the only Allowed Class 14 Claims that will receive a Distribution under the Plan.
3. The Pro Rata Distribution that the City proposes on Exhibit 6-B to Holders of Allowed Class 14 Claims has been computed in accordance with the requirements of the Plan.
4. After making the Distributions listed on Exhibit 6-B of the Motion, the City will have fully satisfied its obligation under the Plan to Distribute B Notes to Holders of Allowed Class 14 Claims.

## THE COURT ORDERS THAT:

5. The Motion is granted in its entirety.
6. The Distribution proposed on Exhibit 6-B to the Motion is authorized and approved.
7. Except as provided in paragraph 6 above, no other Distribution of B Notes shall be made to the Holders of Allowed Class 14 Claims, no other alleged Holder of a Class 14 Claim shall be entitled to a Distribution under the Plan, and
each such other alleged Holder of a Class 14 Claim shall be permanently estopped, barred, and enjoined from seeking a Distribution or any other relief from the City or any of its property.
8. The City and Disbursing Agent are authorized to make payments of accrued interest to the Holders of B Notes at any time and from time to time without further notice or order of the Court. Nothing in this Order shall affect the right of a Holder of an Allowed Class 14 Claim to receive accrued interest under its B Notes.
9. The reduction of the Disputed Unsecured Claims Reserve to $\$ 0$ is authorized and approved.
10. The $\$ 124$ in $B$ Notes that will remain after the Distribution proposed on Exhibit 6-B of the Motion is completed will revert to the City and become City property.
11. This Order is entered in furtherance of this Court's reserved jurisdiction to enter any orders that may be necessary or appropriate to implement or consummate the provisions of the Plan, and to ensure that Distributions to Holders of Claims are accomplished in accordance with the provisions of the Plan.
12. In implementing and enforcing the terms of this Order and the Plan, the City and its Related Entities are entitled to all privileges and protections of the Plan, including the exculpation set forth in Article III.D.6.
13. This Order does not modify the Plan or the Confirmation Order. Each and every term and condition in the Plan and Confirmation Order, including, without limitation, those with respect to the Allowed Claims and Distributions, remains in full force and effect.
14. This Court retains jurisdiction over the interpretation and enforcement of this Order.

## EXHIBIT 2

# 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 OBJECT TO CITY OF DETROIT'S MOTION FOR AN ORDER (A) APPROVING FIRST AND FINAL DISTRIBUTION OF NEW B NOTES TO HOLDERS OF ALLOWED CLASS 14 CLAIMS UNDER THE CITY'S PLAN OF ADJUSTMENT AND (B) GRANTING OTHER RELATED RELIEF

The City of Detroit has filed the foregoing City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief(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<br>211 West Fort Street<br>Detroit, Michigan 48226

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<br>Attn: Marc N. Swanson<br>150 West Jefferson, Suite 2500<br>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.

[^8]
# 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: March 16, 2022

## EXHIBIT 3

None

## EXHIBIT 4

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION 

| In re: |
| :--- |
| City of Detroit, Michigan, <br> $\quad$ Debtor. |

Bankruptcy Case No. 13-53846
Judge Thomas J. Tucker
Chapter 9

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 16, 2022, he filed the foregoing City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief (the "Motion"), using the Court's electronic filing system, which sends notice of the filing to all ECF participants registered to receive notice in this case. The City has engaged a noticing agent, which will serve the Motion by first-class mail on all known Holders of Allowed Other Unsecured Claims, on all parties who received service of the City of Detroit's Motion to Implement Distributions of B Notes to Holders of Allowed Class 14 Claims Under the City's Confirmed Plan of Adjustment (Doc. No. 13126), on all parties who have subsequently filed papers in this case alleging a Class 14 Claim, and on all parties requesting notices listed on the Master Service List and will file a proof of service to that effect.

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

March 16, 2022

## EXHIBIT 5

None

## EXHIBIT 6-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

NOTICE OF<br>FIRST AND FINAL DISTRIBUTION AND DISTRIBUTION DATE

## PLEASE READ THIS NOTICE CAREFULLY!

The Motion distributed with this Notice is the City of Detroit's request to the Bankruptcy Court for the Eastern District of Michigan to approve its first and final distribution of B Notes with respect to Allowed Class 14 "Other Unsecured Claims" ${ }^{1}$ in its bankruptcy case. If you hold a Class 14 Unsecured Claim in the City's bankruptcy case, you should read this Notice carefully, as it contains information related to the treatment of these claims. (Please note that this Notice only discusses the distribution of B Notes with respect to Allowed Class 14 Claims; accrued interest on the $B$ Notes will be paid on a future date or dates to the Holders of $B$ Notes.)

Attached to the Motion are Exhibit 6-B and Exhibit 6-C. Exhibit 6-B contains a list of all Allowed Class 14 Claims that will receive a Distribution of B Notes as required under the City's confirmed bankruptcy Plan. Exhibit 6-B specifies the

[^9]amount of B Notes to be Distributed to each of the Holders of these claims. Because these B Notes were issued in two series with identical terms, Exhibit 6-B lists the amount of each to be Distributed. If the Bankruptcy Court approves the City's planned Distribution, the Distribution of B Notes to Class 14 Claimants is expected to begin on or about May 9, 2022. Distributions will be made to the accounts previously identified by the Holders of these Class 14 Claims and may take a few days to complete. As required by an order of the Bankruptcy Court, ${ }^{2}$ if an attempt to Distribute B Notes to an account fails or is otherwise unsuccessful, the City will notify the Holder of the Claim so that the Claim Holder can take corrective action if needed or desired.

Exhibit 6-C contains a list of Claims that have been abandoned and that will not receive a Distribution of B Notes. Holders of the Claims on Exhibit 6-C were contacted by mail several times but did not return the information necessary for the City to Distribute B Notes to them. As specified in an order of the Bankruptcy Court, ${ }^{3}$ all rights to Distributions on these Claims have been forfeited.

This is the final notice the City will send with respect to Distribution of B Notes. If you hold a Class 14 Claim in the City's bankruptcy case and expect a Distribution of B Notes, you should review Exhibits 6-B and 6-C carefully! If your Claim is either listed on Exhibit 6-C (the list of forfeited Claims) or simply not included in the list on Exhibit 6-B (the list of Claims to receive B Notes), and you believe this to be in error, you should object or otherwise respond to the Motion as directed in the Notice of Opportunity to Object to City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief, attached as Exhibit 2 to the Motion.

Please be further advised that if you object, you will need to explain why you believe you are entitled to a Distribution. Objections, for example, by claimants who simply failed to return the forms required to receive a Distribution or who otherwise failed to comply with requirements of the City's Plan or the orders of the Bankruptcy Court are unlikely to be successful. If you have reason to

[^10]believe, however, that your Claim was omitted from Exhibit 6-B in error, you should take this last and only opportunity to object before the B Notes are Distributed. No further Distributions of B Notes will be made at any time other than the Distributions identified in Exhibit 6-B.

## EXHIBIT 6-B

LIST OF PLANNED DISTRIBUTIONS TO HOLDERS OF ALLOWED CLASS 14 CLAIMS

New B Notes to Be Distributed to Claimants

| Claim Number | Creditor Name | Claim Amount |  | $\begin{array}{\|r\|} \hline \text { \% of Total } \\ \text { Claims } \\ \hline 1.39 \% \end{array}$ | Series 2014B-1 |  | Notes to Be Distributed Series 2014B-2 |  |  | Total | \% of B Note Distribution |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 12 | Jessie Payne | \$ | 2,980,000.00 |  | \$ | 282,663.00 | \$ | 3,049.00 | \$ | 285,712.00 | 1.39\% |
| 13 | Shawn Gargalino | \$ | 75,000.00 | 0.03\% | \$ | 7,114.00 | \$ | 76.00 | \$ | 7,190.00 | 0.03\% |
| 108 | Hassan Hassan | \$ | 4,980,000.00 | 2.32\% | \$ | 472,369.00 | \$ | 5,095.00 | \$ | 477,464.00 | 2.32\% |
| 120 | Zenda Jarrett via her attorneys Gursten, Koltonow, Gursten, Christensen \& Raitt PC | \$ | 55,000.00 | 0.03\% | \$ | 5,216.00 | \$ | 56.00 | \$ | 5,272.00 | 0.03\% |
| 128 | Anna Wright c/o Leonard M. Koltonow | \$ | 430,000.00 | 0.20\% | \$ | 40,786.00 | \$ | 440.00 | \$ | 41,226.00 | 0.20\% |
| 142 | Norfolk Southern Railway Company | \$ | 32,027.35 | 0.01\% | \$ | 3,037.00 | \$ | 32.00 | \$ | 3,069.00 | 0.01\% |
| 145 | Lonciann Sisco | \$ | 75,000.00 | 0.03\% | \$ | 7,114.00 | \$ | 76.00 | \$ | 7,190.00 | 0.03\% |
| 164 | Anthony Collier | \$ | 200,000.00 | 0.09\% | \$ | 18,970.00 | \$ | 204.00 | \$ | 19,174.00 | 0.09\% |
| 201 | Michael Beydoun \& his attorney- Raymond Guzall III | \$ | 2,266,021.12 | 1.05\% | \$ | 214,939.00 | \$ | 2,318.00 | \$ | 217,257.00 | 1.05\% |
| 440 | Christopher Moore | \$ | 40,000.00 | 0.02\% | \$ | 3,794.00 | \$ | 40.00 | \$ | 3,834.00 | 0.02\% |
| 479 | Genes Towing | \$ | 33,960.00 | 0.02\% | \$ | 3,221.00 | \$ | 34.00 | \$ | 3,255.00 | 0.02\% |
| 530 | Todd, Jr., Ira Lee | \$ | 500,000.00 | 0.23\% | \$ | 47,426.00 | \$ | 511.00 | \$ | 47,937.00 | 0.23\% |
| 567 | Mansfield Patterson JR. as p.r. | \$ | 100,000.00 | 0.05\% | \$ | 9,485.00 | \$ | 102.00 | \$ | 9,587.00 | 0.05\% |
| 570 | Mansfield Patterson V as P.R. | \$ | 100,000.00 | 0.05\% | \$ | 9,485.00 | \$ | 102.00 | \$ | 9,587.00 | 0.05\% |
| 572 | Williamson, Tracy (p.r. Of Williamson, Decarlos) | \$ | 80,000.00 | 0.04\% | \$ | 7,588.00 | \$ | 81.00 | \$ | 7,669.00 | 0.04\% |
| 621 | Bell, Edward | \$ | 30,000.00 | 0.01\% | \$ | 2,845.00 | \$ | 30.00 | \$ | 2,875.00 | 0.01\% |
| 787 | Stanley, Sherell S. | \$ | 100,000.00 | 0.05\% | \$ | 9,485.00 | \$ | 102.00 | \$ | 9,587.00 | 0.05\% |
| 792 | Llanes, James | \$ | 60,000.00 | 0.03\% | \$ | 5,691.00 | \$ | 61.00 | \$ | 5,752.00 | 0.03\% |
| 806 | Michigan Economic Dev Corp | \$ | 402,438.92 | 0.19\% | \$ | 38,172.00 | \$ | 411.00 | \$ | 38,583.00 | 0.19\% |
| 807 | Michigan Economic Dev Corp | \$ | 5,081,780.82 | 2.37\% | \$ | 482,024.00 | \$ | 5,200.00 | \$ | 487,224.00 | 2.37\% |
| 808 | Michigan Economic Dev Corp | \$ | 2,000,000.00 | 0.93\% | \$ | 189,706.00 | \$ | 2,046.00 | \$ | 191,752.00 | 0.93\% |
| 836 | Ohakpo, Simeon | \$ | 475,000.00 | 0.22\% | \$ | 45,055.00 | \$ | 486.00 | \$ | 45,541.00 | 0.22\% |
| 844 | Street-gilbert, Joera | \$ | 45,000.00 | 0.02\% | \$ | 4,268.00 | \$ | 46.00 | \$ | 4,314.00 | 0.02\% |
| 928 | Guest, Shuntina | \$ | 40,000.00 | 0.02\% | \$ | 3,794.00 | \$ | 40.00 | \$ | 3,834.00 | 0.02\% |
| 960 | Carter, Steven C. | \$ | 105,521.33 | 0.05\% | \$ | 10,009.00 | \$ | 107.00 | \$ | 10,116.00 | 0.05\% |
| 966 | Davistion, Frank | \$ | 60,000.00 | 0.03\% | \$ | 5,691.00 | \$ | 61.00 | . | 5,752:00 | 0.03\% |
| 979 | Bartell, Dana | \$ | 75,000.00 | 0.03\% | \$ | 7,114.00 | \$ | 76.00 | \$ | 7,190.00 | 0.03\% |
| 999 | Shannon Bratcher | \$ | 27,500.00 | 0.01\% | \$ | 2,608.00 | \$ | 28.00 | \$ | 2,636.00 | 0.01\% |
| 1001 | Jennifer Burton | \$ | 55,000.00 | 0.03\% | \$ | 5,216.00 | \$ | 56.00 | \$ | 5,272.00 | 0.03\% |
| 1002 | Charnita Legette | \$ | 65,000.00 | 0.03\% | \$ | 6,165.00 | \$ | 66.00 | \$ | 6,231.00 | 0.03\% |
| 1003 | Lolita Vann | \$ | 55,000.00 | 0.03\% | \$ | 5,216.00 | \$ | 56.00 | \$ | 5,272.00 | 0.03\% |
| 1008 | Moses Luckett | \$ | 55,000.00 | 0.03\% | \$ | 5,216.00 | \$ | 56.00 | \$ | 5,272.00 | 0.03\% |
| 1064 | Abraham Greer and Sandra Greer | \$ | 2,000,000.00 | 0.93\% | \$ | 189,706.00 | \$ | 2,046.00 | \$ | 191,752.00 | 0.93\% |
| 1138 | Wilmington Trust, National Association, as successor Contract Administrator | \$ | 644,277.66 | 0.30\% | \$ | 61,111.00 | \$ | 659.00 | \$ | 61,770.00 | 0.30\% |
| 1221 | Brown, Jessica Et Al | \$ | 15,000.00 | 0.01\% | \$ | 1,422.00 | \$ | 15.00 | \$ | 1,437.00 | 0.01\% |
| 1375 | Harvey, Gregory | \$ | 75,000.00 | 0.03\% | \$ | 7,114.00 |  | 76.00 | \$ | 7,190.00 | 0.03\% |
| 1390 | The Realty Company | \$ | 237,838.12 | 0.11\% | \$ | 22,559.00 | \$ | 243.00 | \$ | 22,802.00 | 0.11\% |
| 1438 | Calloway, Lorraine | \$ | 32,500.00 | 0.02\% | \$ | 3,082.00 | \$ | 33.00 | \$ | 3,115.00 | 0.02\% |

New B Notes to Be Distributed to Claimants

| Claim <br> Number | Creditor Name | Claim Amount |  | \% of Total <br> Claims <br> $0.03 \%$ | Series 2014B-1 |  | Notes to Be Distributed Series 2014B-2 |  |  | Total | \% of B Note Distribution |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1440 | Smith, Reno | \$ | 75,000.00 |  | \$ | 7,114.00 | \$ | 76.00 | \$ | 7,190.00 | 0.03\% |
| 1454 | Suell, Geraldine | \$ | 45,000.00 | 0.02\% | \$ | 4,268.00 | \$ | 46.00 | \$ | 4,314.00 | 0.02\% |
| 1489 | Darshay Cunningham | \$ | 75,000.00 | 0.03\% | \$ | 7,114.00 | \$ | 76.00 | \$ | 7,190.00 | 0.03\% |
| 1507 | Goudy, Larentinna | \$ | 30,000.00 | 0.01\% | \$ | 2,845.00 | \$ | 30.00 | \$ | 2,875.00 | 0.01\% |
| 1518 | Rogers, Jason | \$ | 40,000.00 | 0.02\% | \$ | 3,794.00 | \$ | 40.00 | \$ | 3,834.00 | 0.02\% |
| 1544 | Brooks, I-chauntay | \$ | 75,000.00 | 0.03\% | \$ | 7,114.00 | \$ | 76.00 | \$ | 7,190.00 | 0.03\% |
| 1554 | Clayton, Julius | \$ | 120,000.00 | 0.06\% | \$ | 11,382.00 | \$ | 122.00 | \$ | 11,504.00 | 0.06\% |
| 1604 | Pamell, Taesean a minor by his next friend Corliss Thomas | \$ | 60,000.00 | 0.03\% | \$ | 5,691.00 | \$ | 61.00 | \$ | 5,752.00 | 0.03\% |
| 1646 | Thompson, Keith | \$ | 30,000.00 | 0.01\% | \$ | 2,845.00 | \$ | 30.00 | \$ | 2,875.00 | 0.01\% |
| 1649 | Faye Atkins | \$ | 48,000.00 | 0.02\% | \$ | 4,552.00 | \$ | 49.00 | \$ | 4,601.00 | 0.02\% |
| 1739 | Patricia Ramirez | \$ | 600,000.00 | 0.28\% | \$ | 56,912.00 | \$ | 613.00 | \$ | 57,525.00 | 0.28\% |
| 1857 | Shafer \& Associates, P.C. | \$ | 905,718.65 | 0.42\% | \$ | 85,910.00 | \$ | 926.00 | \$ | 86,836.00 | 0.42\% |
| 1862 | Detroit Police Officers Association (DPOA) | \$ | 12,500,000.00 | 5.82\% | \$ | 1,185,667.00 | \$ | 12,790.00 | \$ | 1,198,457.00 | 5.82\% |
| 1910 | Green, Glenn | \$ | 55,000.00 | 0.03\% | \$ | 5,216.00 | \$ | 56.00 | \$ | 5,272.00 | 0.03\% |
| 2032 | Gjergii, Gjush | \$ | 55,000.00 | 0.03\% | \$ | 5,216.00 | \$ | 56.00 | \$ | 5,272.00 | 0.03\% |
| 2226 | Janet Johnson | \$ | 115,000.00 | 0.05\% | \$ | 10,908.00 | \$ | 117.00 | \$ | 11,025.00 | 0.05\% |
| 2274 | Mcpherson, Randall | \$ | 30,000.00 | 0.01\% | \$ | 2,845.00 | \$ | 30.00 | \$ | 2,875.00 | 0.01\% |
| 2277 | Brandt, Charlotte | \$ | 75,000.00 | 0.03\% | \$ | 7,114.00 | \$ | 76.00 | \$ | 7,190.00 | 0.03\% |
| 2279 | Tulik, Mark | \$ | 40,000.00 | 0.02\% | \$ | 3,794.00 | \$ | 40.00 | \$ | 3,834.00 | 0.02\% |
| 2312 | Melvin Lyle Larsen | \$ | 30,000.00 | 0.01\% | \$ | 2,845.00 | \$ | 30.00 | \$ | 2,875.00 | 0.01\% |
| 2328 | Parsons Brinckerhoff Michigan, Inc. | \$ | 829,567.58 | 0.39\% | \$ | 78,687.00 | \$ | 848.00 | \$ | 79,535.00 | 0.39\% |
| 2603 | Sherell Shawnee Stanley | \$ | 100,000.00 | 0.05\% | \$ | 9,485.00 | \$ | 102.00 | \$ | 9,587.00 | 0.05\% |
| 2717 | Loving, Courtney, Et Al | \$ | 35,000.00 | 0.02\% | \$ | 3,319.00 | \$ | 35.00 | \$ | 3,354.00 | 0.02\% |
| 2733 | Harris, Sammie Kevin | \$ | 100,000.00 | 0.05\% | \$ | 9,485.00 | \$ | 102.00 | \$ | 9,587.00 | 0.05\% |
| 2851 | Coalition Of Detroit Unions Et Al, | \$ | 14,771,270.00 | 6.88\% | \$ | 1,401,105.00 | \$ | 15,115.00 | \$ | 1,416,220.00 | 6.88\% |
| 2926 | Balfour, Delshone | \$ | 29,176.02 | 0.01\% | \$ | 2,767.00 | \$ | 29.00 | \$ | 2,796.00 | 0.01\% |
| 2958 | Michigan AFSCME Council 25 and its affiliated Detroit Locals | \$ | 95,380,410.00 | 44.40\% | \$ | 9,047,157.00 | \$ | 97,600.00 | \$ | 9,144,757.00 | 44.40\% |
| 3026 | Charter County of Wayne | \$ | 700,000.06 | 0.33\% | \$ | 66,397.00 | \$ | 716.00 | \$ | 67,113.00 | 0.33\% |
| 3031 | Charter County of Wayne | \$ | 364,551.23 | 0.17\% | \$ | 34,578.00 | \$ | 373.00 | \$ | 34,951.00 | 0.17\% |
| 3232 | Steven Wolak, as Personal Representative of the Estate of Christopher Wolak, Deceased | \$ | 355,000.00 | 0.17\% | \$ | 33,672.00 | \$ | 363.00 | \$ | 34,035.00 | 0.17\% |
| 3464 | Turner, Pamela | \$ | 350,000.00 | 0.16\% | \$ | 33,198.00 | \$ | 358.00 | \$ | 33,556.00 | 0.16\% |
| 3658 | U.S. Equal Employment Opportunity Commission | \$ | 90,000.00 | 0.04\% | \$ | 8,536.00 | \$ | 92.00 | \$ | 8,628.00 | 0.04\% |
| 3683 | Macomb Interceptor Drain Drainage District by and through the Macomb County Public Works Commissioner | \$ | 22,000,000.00 | 10.24\% | \$ | 2,086,775.00 | \$ | 22,512.00 | \$ | 2,109,287.00 | 10.24\% |
| 3731 | State of Michigan, Department of Transportation | \$ | 62,132.00 | 0.03\% | \$ | 5,893.00 | \$ | 63.00 | \$ | 5,956.00 | 0.03\% |
| 3750 | State of Michigan, Dept. of Environmental Quality | \$ | 3,421,995.25 | 1.59\% | \$ | 324,587.00 | \$ | 3,501.00 | \$ | 328,088.00 | 1.59\% |

New B Notes to Be Distributed to Claimants

| $\begin{array}{\|c\|} \hline \text { Claim } \\ \text { Number } \\ \hline \end{array}$ | Creditor Name | Claim Amount |  | \% of Total Claims | Series 2014B-1 |  | Notes to Be Distributed Series 2014B-2 |  |  | Total | \% of B Note Distribution |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 3751 | State of Michigan, Dept. of Environmental Quality | \$ | 1,505,684.00 | - 0.70\% | \$ | 142,819.00 | \$ | 1,540.00 | \$ | 144,359.00 | 0.70\% |
| 3816 | Sky Group Grand, LLC | \$ | 4,800,000.00 | 2.23\% | \$ | 455,296.00 | \$ | 4,911.00 | \$ | 460,207.00 | 2.23\% |
| 3832 | Charter County of Wayne | \$ | 20,800,000.00 | 9.68\% | \$ | 1,972,950.00 | \$ | 21,284.00 | \$ | 1,994,234.00 | 9.68\% |
| 3843 | American Home Assurance Company, Chartis Excess Limited, Chartis Specialty Insurance Company, et al. | \$ | 150,240.00 | 0.07\% | \$ | 14,250.00 | \$ | 153.00 | \$ | 14,403.00 | 0.07\% |
| 3846 | Loevy and Loevy | \$ | 1,269,203.13 | 0.59\% | \$ | 120,388.00 | \$ | 1,298.00 | \$ | 121,686.00 | 0.59\% |
| 3847 | David Haron | \$ | 263,312.50 | 0.12\% | \$ | 24,976.00 | \$ | 269.00 |  | 25,245.00 | 0.12\% |
| 3848 | Stephanie Brown | \$ | 15,000.00 | 0.01\% | \$ | 1,422.00 | \$ | 15.00 | \$ | 1,437.00 | 0.01\% |
|  | Subtotal |  | 206,080,125.74 | 95.93\% | \$ | 19,547,364.00 | \$ | 210,835.00 | \$ | 19,758,199.00 | 95.93\% |
|  | Claims forfeited for lack of brokerage or tax information |  | 8,745,272.12 | 4.07\% | \$ | 829,498.00 |  | \$8,926.00 |  | \$838,424.00 | 4.07\% |
|  | Total |  | 214,825,397.86 | 100.00\% | \$ | 20,376,862.00 | \$ | 219,761.00 | \$ | 20,596,623.00 | 100.00\% |
|  | Total B Notes Available <br> Undistributable due to "rounding" requirements* |  |  |  | \$ | $\begin{array}{r} 20,376,922.00 \\ 60.00 \\ \hline \end{array}$ | \$ | $\begin{array}{r} 219,825.00 \\ 64.00 \\ \hline \end{array}$ | $\$$ | $\begin{array}{r} 20,596,747.00 \\ 124.00 \\ \hline \end{array}$ |  |

* B Notes can only be distributed in whole dollar increments, and distributions must reflect that. This leaves a small amount of left over notes that cannot be distributed.


## EXHIBIT 6-C

LIST OF HOLDERS OF ALLOWED CLASS 14 CLAIMS THAT DID NOT COMPLY WITH THE BROKERAGE ORDER AND WHOSE CLAIMS HAVE BEEN DISALLOWED AND EXPUNGED

Claims Waived for Failure to Timely Return Brokerage to Tax Information

| Claim Number | Creditor Name | Claim Amount |  |
| :---: | :---: | :---: | :---: |
| 177 | Barbara Gustafson, as Next Friend for Shawn Gustafson, a minor | \$ | 35,000.00 |
| 411 | Cellco Partnership D/B/A Verizon Wireless | \$ | 26,495.54 |
| 573 | Williamson, Decarlos | \$ | 80,000.00 |
| 630 | Migliori, Sebastian | \$ | 35,000.00 |
| 670 | Albert Jenkins | \$ | 90,000.00 |
| 759 | Examworks Inc | \$ | 38,495.78 |
| 855 | Sufi, Nabil Pr Of Est. Of Ali Sufi, Dec. | \$ | 75,000.00 |
| 889 | Record Copy Services | \$ | 56,291.95 |
| 894 | The Detroit Medical Center, as agent for Harper-Hutzel Hospital | \$ | 69,247.40 |
| 910 | Advance Digital Systems, LLC | \$ | 103,104.53 |
| 914 | Conaway, Brenda | \$ | 55,000.00 |
| 965 | Williams, La-sheryl | \$ | 40,000.00 |
| 976 | Gilstrap, Jenniger | \$ | 60,000.00 |
| 1000 | Matthew Karcher | \$ | 35,000.00 |
| 1075 | General Shale Brick Company | \$ | 7,271.94 |
| 1189 | Financial Guaranty Insurance Company | \$ | 6,150,000.00 |
| 1307 | Jaylen Washington | \$ | 35,000.00 |
| 1325 | Rosalind Johnson | \$ | 40,000.00 |
| 1334 | Susan K. Davis | \$ | 65,000.00 |
| 1373 | Hampton, Crystal | \$ | 5,000.00 |
| 1389 | Clark Hill | \$ | 45,000.00 |
| 1436 | Barthel Contracting Co | \$ | 26,304.97 |
| 1437 | Wade Trim Associates Inc | \$ | 31,931.53 |
| 1537 | Cade, Alyse | \$ | 55,000.00 |
| 1573 | McKay, Michael | \$ | 42,500.00 |
| 1578 | Denson, Velma | \$ | 40,000.00 |
| 1609 | Curtis Morris | \$ | 30,000.00 |
| 1641 | Raymond Thompson | \$ | 150,000.00 |
| 1849 | Edward Schenburn | \$ | 30,000.00 |
| 2110 | Carlton Whitfield | \$ | 130,000.00 |
| 2190 | Troy Williams | \$ | 50,000.00 |
| 2260 | Bell, Shelton (estate Of) P/r, Tammy Howard | \$ | 75,000.00 |
| 2282 | Williams Acosta, PLLC | \$ | 127,312.76 |
| 2313 | Pitt McGehee Palmer \& Rivers, PC | \$ | 29,375.00 |
| 2353 | Wojnarski, Joanne | \$ | 280,000.00 |
| 2403 | Smith \& Wesson Corp | \$ | 112,000.00 |
| 2859 | SAAA Union - Members | \$ | 138,650.00 |
| 2912 | Plunkett Cooney | \$ | 42,902.74 |
| 2956 | Eddie Lee Brown | \$ | 50,000.00 |
| 3173 | Ramsey, Alexis | \$ | 29,500.00 |
| 3676 | Airgas USA LLC | \$ | 41,979.02 |
| 3825 | Iron Mountain Information Management, LLC | \$ | 86,908.96 |
|  | Total | \$ | 8,745,272.12 |

## Exhibit B

## EXHIBIT 2

## 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 OBJECT TO CITY OF DETROIT'S MOTION FOR AN ORDER (A) APPROVING FIRST AND FINAL DISTRIBUTION OF NEW B NOTES TO HOLDERS OF ALLOWED CLASS 14 CLAIMS UNDER THE CITY'S PLAN OF ADJUSTMENT AND (B) GRANTING OTHER RELATED RELIEF

The City of Detroit has filed the foregoing City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief (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 West Fort Street<br>Detroit, Michigan 48226

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<br>Attn: Marc N. Swanson<br>150 West Jefferson, Suite 2500<br>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.

[^11]
## ||||||||||||||||||||||||||||||||||||||||||||||

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.<br>By: /s/ Marc N. Swanson<br>Marc N. Swanson (P71149)<br>150 West Jefferson, Suite 2500<br>Detroit, Michigan 48226<br>Telephone: (313) 496-7591<br>Facsimile: (313) 496-8451<br>swansonm@millercanfield.com

Dated: March 16, 2022

## EXHIBIT 3

None

## EXHIBIT 4

## 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 March 16,2022 , he filed the foregoing City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief (the "Motion"), using the Court's electronic filing system, which sends notice of the filing to all ECF participants registered to receive notice in this case. The City has engaged a noticing agent, which will serve the Motion by first-class mail on all known Holders of Allowed Other Unsecured Claims, on all parties who received service of the City of Detroit's Motion to Implement Distributions of B Notes to Holders of Allowed Class 14 Claims Under the City's Confirmed Plan of Adjustment (Doc. No. 13126), on all parties who have subsequently filed papers in this case alleging a Class 14 Claim, and on all parties requesting notices listed on the Master Service List and will file a proof of service to that effect.

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
March 16, 2022

## 

## EXHIBIT 5

None

## EXHIBIT 6-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

## NOTICE OF <br> FIRST AND FINAL DISTRIBUTION AND DISTRIBUTION DATE

## PLEASE READ THIS NOTICE CAREFULLY!

The Motion distributed with this Notice is the City of Detroit's request to the Bankruptcy Court for the Eastern District of Michigan to approve its first and final distribution of B Notes with respect to Allowed Class 14 "Other Unsecured Claims" ${ }^{1}$ in its bankruptcy case. If you hold a Class 14 Unsecured Claim in the City's bankruptcy case, you should read this Notice carefully, as it contains information related to the treatment of these claims. (Please note that this Notice only discusses the distribution of $B$ Notes with respect to Allowed Class 14 Claims; accrued interest on the $B$ Notes will be paid on a future date or dates to the Holders of $B$ Notes.)

Attached to the Motion are Exhibit 6-B and Exhibit 6-C. Exhibit 6-B contains a list of all Allowed Class 14 Claims that will receive a Distribution of B Notes as required under the City's confirmed bankruptcy Plan. Exhibit 6-B specifies the

[^12]amount of $B$ Notes to be Distributed to each of the Holders of these claims. Because these B Notes were issued in two series with identical terms, Exhibit 6-B lists the amount of each to be Distributed. If the Bankruptcy Court approves the City's planned Distribution, the Distribution of B Notes to Class 14 Claimants is expected to begin on or about May 9, 2022. Distributions will be made to the accounts previously identified by the Holders of these Class 14 Claims and may take a few days to complete. As required by an order of the Bankruptcy Court, ${ }^{2}$ if an attempt to Distribute B Notes to an account fails or is otherwise unsuccessful, the City will notify the Holder of the Claim so that the Claim Holder can take corrective action if needed or desired.

Exhibit 6-C contains a list of Claims that have been abandoned and that will not receive a Distribution of $B$ Notes. Holders of the Claims on Exhibit 6-C were contacted by mail several times but did not return the information necessary for the City to Distribute B Notes to them. As specified in an order of the Bankruptcy Court, ${ }^{3}$ all rights to Distributions on these Claims have been forfeited.

This is the final notice the City will send with respect to Distribution of $B$ Notes. If you hold a Class 14 Claim in the City's bankruptcy case and expect a Distribution of B Notes, you should review Exhibits 6-B and 6-C carefully! If your Claim is either listed on Exhibit 6-C (the list of forfeited Claims) or simply not included in the list on Exhibit 6-B (the list of Claims to receive B Notes), and you believe this to be in error, you should object or otherwise respond to the Motion as directed in the Notice of Opportunity to Object to City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief, attached as Exhibit 2 to the Motion.

Please be further advised that if you object, you will need to explain why you believe you are entitled to a Distribution. Objections, for example, by claimants who simply failed to return the forms required to receive a Distribution or who otherwise failed to comply with requirements of the City's Plan or the orders of the Bankruptcy Court are unlikely to be successful. If you have reason to

[^13]believe, however, that your Claim was omitted from Exhibit 6-B in error, you should take this last and only opportunity to object before the B Notes are Distributed. No further Distributions of B Notes will be made at any time other than the Distributions identified in Exhibit 6-B.

## EXHIBIT 6-B

LIST OF PLANNED DISTRIBUTIONS TO HOLDERS OF ALLOWED CLASS 14 CLAIMS
New B Notes to Be Distributed to Claimants

New B Notes to Be Distributed to Claimants

New B Notes to Be Distributed to Claimants


## EXHIBIT 6-C

LIST OF HOLDERS OF ALLOWED CLASS 14 CLAIMS THAT DID NOT COMPLY WITH THE BROKERAGE ORDER AND WHOSE CLAIMS HAVE BEEN DISALLOWED AND EXPUNGED

## Claims Waived for Failure to Timely Return Brokerage to Tax Information



## Exhibit C



FedEx•Tracking

773808577848
ADD NICKNAME
Delivered
Wednesday, 5/26/2021 at 10:03 am


## Obtain proof of delivery

For a detailed proof of delivery, enter the 9 -digit shipper or payer FedEx account number associated with this shipment.

## ACCOUNT NUMBER (OPTIONAL)



## FROM

PLEASANT RIDGE, MIUS

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\begin{gathered}
\text { TO } \\
\text { EL SEGUNDO, CAUS }
\end{gathered}
$$

Travel History

## time zone <br> Local Scan Time

Wednesday, May 26,

## Shipment Facts

TRACKING NUMBER
773808577848

SPECIAL HANDLING SECTION
Deliver Weekday

## SERVICE

FedEx Prionity Overnight
SHIP DATE
5/25/21 (3)

SHIPPER REFERENCE
DETROIT BANKRUPTCY

ACTUAL DELIVERY
5/26/21 at 10:03am

## OUR COMPANY

About FedEx(https://www.fedex.com/en-us/about.html)
Our Portfolio(https://www.fedex.com/en-us/about/company-structure.htmI)
Investor Relations(hitps://investors.fedex.com/home/defaultaspx)
Careers(https://careers.fedex.com/fedex/)
FedEx Blog(hitps://www.fedex.com/en-us/blog.html)
Corporate Responsiblify(htips://www.fedex.com/en-us/about/corporate-social-responsibilityhtml)
Newsroom(htips://newsroom.fedex.com/)
Contact Us(https://www.fedex.com/en-us/customer-support/contact-us.html)

## MORE FTOMOM FEDEX

FedEx Compatible(https://www.fedex.com/er-us/compatible.html)
FedEx Developer Portal(https://developer.fedex.com/api/en-us/home.htmil)
FedEx Logistics(https://www.fedex.com/en-us/logistics.html)
FedEx Cross Border(https://www.fedex.com/en-us/cross-border.html)
ShopRunner(https://www.fedex.com/en-us/shoprunner.html)

## LANEUAGE

Change Country/Tersitory(https://www.fedex.com/?location=home)
FOLLOWFEDEX (https://www.fedex.com/er-us/email.html) (Https://www.facebook.com/FedEx/)
(Https://twitter.com/fedex) (https://www.instagram.com/fedex/) (https://www.inkedin.corn/company/fedex)
(https://www.youtube.com/fedex) p (https://www.pinterest.com/FedEx/)

I Terms of Use (https//www.fedex.com/en-us/terms-ofusehtmi)

Privacy \& Security hthps://www.fedex.com/en-us/trustcenterhtmi

## 

## BROKERAGE ACCOUNT AND DIRECTTON FORM

Name of Creditor as sot fortio on proof of claim form:

The above-named Creditor hereby designates the broker-dealer named below to receive the Creditor's Distribution of B-Notes in accordance with the Nottce Regarding Staius of Nein $B$ Notes to be Distributed to the Holders of Allowed Class 14 Claims dated December 27, 2019 (the "Notioe"). The Creditor acknowledges that neither the City nor the Disbursing Agent is
 Direction Fom, and that any Distribution of New $B$ Notes is subject in all respects to the terms and conditions of the Notice, Plan and Order of the Bankcraptoy Corast.

| Broker-Dealer Lnformation (to be provided by broker/dealer) |  |
| :---: | :---: |
| DTC Participatifinoker Name | Fifth Thind Securities |
| DTC Participanat croker \# | 0226 |
| DTC Participant Contict Trformation (Name, Phone \#) | Shanairi Wilulams, Imestment ${ }^{\text {figec, }}$ 248. 397.0349 Ass r. Vice president |
| For Further Credit To | taesean Parnell |
| FFC AC \# | 048-277186 |



By no later than June 24, 2020, you must mail this notice to the City of Detroit at the following
address:
City of Detroit Claims Processing Center $\mathrm{c} / 0 \mathrm{KCC}$
222 N. Pacifia Coast Fighway, Suite 300
EI Segundo, CA 90245


## Request for Taxpayer Identification Number and Certification

(Rev. October 2018) Department of the Treasury Intemal Revenue Service

## 1 Name (as shown on your income tax retum). Name is rip

 TAESEAN PARNELL
## 2. Business name/distegarded entity name, if different from above

3 Check appropriate box for federal tax classification of the person whose name is antlered on tine t . Check only one of the
following seven boxes.
<compat>ᄌx Individualisole proprietor or
पC Corporation

- S Corporation $^{2}$
$\square$ Partnership
■Trustestate
Print or type


 not disregarded from the owner for U.S. federal tax purposes. Otherwise, a singlemsemberner of the LIC is another LLC that is should che ak the appropriate box for the tex classification of it a owner. $\square$ Other (sse instructions)
B Address (number, street, and apt. or suite no.) Sea instructions, 17358 ANNOTT STREET
6 City, state, and $Z 1 P$ ede DETROIT: MICHIGAN 48205
7 List account number (s) hers (optional)
048-277748:


## Part 1 Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a residentation, sole proprietor, or disregarded entity, see the instructions for Part l, later. For other entitles, It is your employer identification number (EIN). If you do not have a number, see How to get a TIN, later.
Note. If the account is in more than one name, see the instructions for lIne 1. Also see What Name and Number

| Social security number |
| :---: |
| $377-33-8571$ |

To Give the Requester for guidelines on whose number to enter.

## Part If Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number fo be Issued to me); and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding or (b) I have not been sued to me); and Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or hove not been notified by the Internal Revenue longer subject to backup withholding; and
3. I am a U.S. citizen or other U.S. person (defined below); and
4. The FATCA codes) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

Certification instructions. You must cross out tam 2 above if you have been notified by the IRS that you are currently subject to backup withholding paid, acquisition or abandonment of secured and dividends on your fax return. For real estate transactions, item 2 does not apply, For mortgage interest payments other than interest and dividends, you are not requited to sign the certification, but you must provide your arrangement (IRA), end generally, Part ll, later,


Section references are to the intemal Revenue Code unless otherwise noted.
Future devalapments. For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to wwwiirs.gow/FormW/9.

## Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) which may be your social security number (SSN), Individual taxpayer Identification number (ITNN), adoption taxpayer identification number (ATIN), or employer Identification number (EIN), to report on an information return the amount paid to you, or other amount reportable on an information return. Examples of information returns include, but are not lionited to, the following:

- Form 1099-INT (interest earned or paid)

Form 1099-DIV (dividends, including those from stocks or mutual
funds)

- Form 109e-MISC (various types of Income, prizes, awards, or gross
proceeds)
- Form 1099-B (stock or mutual fund sales and certain other transactions by brokers)
- Form 1090-S (proceeds from real estate transactions)
- Form 1099-K (merchant card and third party network transactions)
- Form 1098 (home mortgage interest), $1098-\mathrm{E}$ (studentioan interest), 1098-T (tuition)
- Form 1099-c (canceled debit)
- Form 1099-A (acquisition or abandonment of secured property) Use Form W-9 only ff you are a U.S. person including a resident allen), to provide your correct TIN.

If you do not return Form W-9 to the requester wilt a $7 N$, you might be subject to backup with holding. See What is backup
withholding later.

## EXHIBITT B

## BROKERAGE ACCOUNT AND DIRECTION FORM

Name of Creditor as set forth on proof of claim form:

- Cirgary Brazell

The above-named Creditor hereby designates the broker-dealer named below to receive the Creditor's Distribution of B-Notes in accordance with the Notice Regarding Status of New $B$ Notes to be Distributed to the Holders of Allowed Class 14 Clatms dated December 27, 2019 (the "Notice"). The Creditor acknowledges that neither the City nor the Disbursing Agent is obligated to confirm the aceuracy of the information providedin-this-Brokerage-A cocunt and Direction Form, and that any Distribution of New B Notes is subject in all respects to the terms and conditions of the Notice, Plan and Order of the Bankruptoy Court.

| Broker-Dealer Information (to be provided by broker/dealer) |  |
| :---: | :---: |
| DTC Participant/Broker Name | Fiftit Thiro Secorimes |
| DTC Participant Broker \# | 0226 |
| DTC Participant Contact Infomation (Name, Phone \#) | 590 Parkview: APT 301 DETROHT, 1148914 248-397-6348 |
| For Further Credit To | Grebory Brazszl. |
| FFC A/C \# | 048-277185 |

Signature of Creditor:


By no later than Jume 24, 2020, you must mail this notice to the City of Detroit at the following
address:

> City of Detroit Claims Processing Center c/o KCC
> 222 N. Pacific Coast Highway, Suite 300
> EI Segundo, CA 90245
-B-1 -

## 



## 

## EXHIBIT B

## BROKERAGE ACCOUNT AND DIRECTION FORM

Name of Creditor as set forth on proof of claim form:

- Ratmeno thomeron, JR.

The above-named Creditor hereby designates the broker-dealer named below to receive the Creditor's Distribution of B-Notes in accordance with the Notice Regarding Status of New $B$ Notes to be Distributed to the Holders of Allowed Class 14 Claims dated December 27, 2019 (the "Notice"). The Creditor acknowledges that neither the City nor the Disbursing Agent is obligated tocondirm the accuracy of the information provided th this Brokerage Account and Direction Form, and that any Distribution of New B Notes is subject in all respects to the terms and conditions of the Notice, Plan and Order of the Bankruptcy Court.

| Broker-Dealer Information (to be provided by broker/dealer) |  |
| :---: | :---: |
| DTC Participant/Broker Name | Fifth Thirp Securities |
| DTC Participant Broker \# | $048-277187 / 0226$ |
| DṪC Participant Contact Information (Name, Phone \#) | Shanarl Wilu imas invesiment exiecotive $248 \cdot 397-0349$ <br>  |
| For Further Credit To | Raymond Thompson, Je |
| FFC A/C \# | 048-277187 |



By no later than Jume 24, 2020, you must mail this notice to the City of Detroit at the following
address:

> City of Detroit Claims Processing Center c/o KCC
> 222 N. Pacific Coast.Highway, Suite 300
> EI Segundo, CA 90245

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## Punitue of Form










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## Exhibit D

New B Notes to Be Distributed to Clalmants


## Exhibit E

## Claims Waived for Failure to Timely Return Brokerage to Tax Information

|  | Creditor dame |  |  |
| :---: | :---: | :---: | :---: |
| 177 | Barbara Gustafson, as Next Friend for Shawn Gustafson, a minor | \$ | 35 |
| 411 | Cellico Partnership D/B/A Verizon Wireless | \$ | 26,495.54 |
| 573 | Williamson, Decarlos | \$ | 80,000.00 |
| 630 | Migliori, Sebastian | \$ | 35,000.00 |
| 670 | Albert Jenkins | \$ | 90,000.00 |
| 759 | Examworks Inc | \$ |  |
| 855 | Sufi, Nabil Pr Of Est. Of Ali Sufi, Dec. | \$ | $38,495.78$ $75,000.00$ |
| 889 | Record Copy Services | \$ | $75,000.00$ $56,291.95$ |
| 894 | The Detroit Medical Center, as agent for Harper-Hutzel Hospital | \$ | $56,291.95$ $69,247.40$ |
| 910 | Advance Digital Systems, LLC | \$ | 69,247.40 $103,104.53$ |
| 914 | Conaway, Brenda | \$ | $103,104.53$ $55,000.00$ |
| 965 | Williams, La-sheryl | \$ | $55,000.00$ 40,00000 |
| 976 | Gilstrap, Jenniger | \$ |  |
| 1000 | Matthew Karcher | \$ | 60,000.00 |
| 1075 | General Shale Brick Company | \$ | $35,000.00$ $7,271.94$ |
| 1189 | Financial Guaranty Insurance Company | \$ | 7,271.94 |
| 1307 | Jaylen Washington | \$ | 1,000,000.00 |
| 1325 | Rosalind Johnson | \$ | 35,000.00 |
| 1334 | Susan K. Davis | \$ | 40,000.00 |
| 1373 | Hampton, Crystal | \$ | 65,000.00 |
| 1389 | Clark Hill | \$ | 5,000.00 |
| 1436 | Barthel Contracting Co | \$ | 45,000.00 |
| 1437 | Wade Trim Associates Inc | \$ | 26,304.97 |
| 1537 | Cade, Alyse | \$ | 31,931.53 |
| 1573 | McKay, Michael | \$ | 55,000.00 |
| 1578 | Denson, Velma | \$ | 42,500.00 |
| 1609 | Cuttis Morris | \$ | 40,000.00 |
| 1641. | Raymond Thompson. | \$ | 30,000.00 |
| 1849 | Edward Schenburn | \$ | 150,000.00 |
| 2110 | Carlton Whitfield | \$ | 30,000.00 |
| 2190 | Troy Williams | \$ | 130,000.00 |
| 2260 | Bell, Shelton (estate Of) P/r, Tammy Howard | \$ | 50,000.00 |
| 2282 | Williams A costa, PLLC | \$ | 75,000.00 |
| 2313 | Pitt McGehee Palmer \& Rivers, PC | \$ |  |
| 2353 | Wojnarski, Joanne | \$ | 29,375.00 |
| 2403 | Smith \& Wesson Corp | \$ | 280,000.00 |
| 2912 | Plunkett Cooney | \$ | $37,000.00$ 42,90274 |
| 2956 | Eddie Lee Brown | \$ | 42,902.74 |
| 3173 | Ramsey, Alexis | \$ | 50,000.00 |
| 3676 | Airgas USA LLC | \$ | 29,500.00 |
| 3825 | Iron Mountain Information Management, LLC | \$ | 41,979.02 $86,908.96$ |
| W, 4 |  |  | ,381,622.12 |

## Exhibit F

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICEIGAN SOUTHERN DIVISION 

In re:
City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846
Judge Thomas J. Tucker
Chapter 9

# CERTIFICATION OF NO RESPONSE OR OBJECTION REGARDING <br> CITY OF DETROIT'S MOTION FOR AN ORDER (A) APPROVING FIRST AND FINAL DISTRIBUTION OF NEW B NOTES TO HOLDERS OF ALLOWED CLASS 14 CLATMS UNDER THE CITY'S PLAN OF ADJUSTMENT AND (B) GRANTING OTHER RELATED RELIEF 

On March 16, 2022, the City of Detroit ("City") filed the City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New $B$ Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief [Doc. No. 13521] ("Motion").

The Motion was served in accordance with the certificates of service at docket numbers $13522,13534,13535$, and $13536 .{ }^{1}$ No formal objections to the Motion have been filed and the deadline to do so has passed.

The City did receive a number of informal inquiries and objections with respect to the Motion, which it successfully worked to resolve. See Doc. Nos. 13528, 13530, 13553-56. One objection related to a claimant whose claim, claim number

[^14]843, was inadvertently omitted from both Exhibits 6-B and 6-C. Doc. No. 13566; Doc. No. 13567 ("Mosley Order").

As set forth in the Motion, Exhibit 6-B to the Motion contains a list of the Holders ${ }^{2}$ of Allowed Class 14 Claims that will receive Distributions, including the amount of each Claim and the amount of B Notes to be Distributed to the Claim Holder in respect of each Claim. Exhibit 6-C to the Motion contains a list of formerly-Allowed Class 14 Claims that were subsequently disallowed and expunged under the Brokerage Order because the Holders failed to timely provide the necessary tax and brokerage account information required by the Brokerage Order.

As agreed by stipulation with the claimant's legal representative and approved by order of this Court in the Mosley Order, the B Notes for claim number 843 will be held in reserve by the City until (a) a personal representative for the claimant's estate is appointed and that representative returns tax and brokerage forms for the claim as required by the Mosley Order and the Brokerage Order, or (b) September 16, 2022. Id. Distributions to all claimants have been recalculated to account for this omitted claim and the informal objection resolutions noted above, resulting in slight changes in planned Distribution amounts for each claimant and thus slight

[^15]revisions to Exhibit 6-B and Exhibit 6-C. Revised versions of Exhibits 6-B and Exhibit 6-C are attached to the Certificate as Exhibits 6-B and 6-C (using the same numbering as in the Motion to avoid confusion), along with a short narrative summarizing the revisions to each exhibit. ${ }^{3}$

The City also attached a Distribution Notice to the Motion as Exhibit 6-A. A revised Distribution Notice and redline is attached to this Certification as Exhibit 6A. The City will file-a-new-Distribution-Notice-once-a new-date for-Distributionhas been selected (the previous target date of May 9 has passed), with the revised Exhibits 6-B and 6-C attached to this Certification.

A revised proposed order to the Motion is attached as Exhibit 1, followed by a redline to the form of the order that accompanied the Motion.

The City respectfully requests that the Court enter the proposed order attached as Exhibit 1.

[^16]-3-

Dated: May 20, 2022

# CITY OF DETROIT LAW DEPARTMENT <br> By: /s/Charles N. Raimi <br> Charles N. Raimi (P29746) <br> Mary Beth Cobb (P40080) <br> James Noseda (P52563) <br> Attorneys for the City of Detroit <br> 2 Woodward Avenue, Suite 500 <br> Detroit, Michigan 48226 <br> Phone - (313) 224-4550 <br> Email - raimic@detroitmi.gov <br> MELER-CANFIELE, PADDOCKAND STONE, P.L.C. 

By: / /s/ Marc N. Swanson<br>Marc N. Swanson (P71149)<br>Ronald A. Spinner (P73198)<br>150 West Jefferson, Suite 2500<br>Detroit, Michigan 48226<br>Phone - (313) 496-6420<br>Facsimile - (313) 496-8451<br>Email - swansonm@millercanfield.com<br>Counsel for the City of Detroit, Michigan

## EXATBIT 1

# 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 (A) APPROVING FIRST AND FINAL DISTRIBUTION OF NEW B NOTES TO HOLDERS OF ALLOWED CLASS 14 CLATMS UNDER THE CITY'S PLAN OF ADJUSTMENT AND (B) GRANTING OTHER RELATED RELIEF

This matter having come before the Court on the City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief (the "Motion," Doc. No. 13521)', notice having been given by first-class mail to all known Holders of Class 14 Claims under the Plan, all creditors and other parties in interest who requested notice or alleged Class 14 Claims, and others, and by ECF to all participants registered to receive notice in this bankruptcy case, and no further notice being necessary or required; no objections having been timely filed to the Motion; the Court being fully advised in the premises; and there being good and sufficient cause to grant the relief requested,

[^17]
## THE COURT FINDS THAT:

1. The City's compliance with paragraph 6 of this Order will satisfy the City's obligation under the Plan to file a notice of the planned Distribution Date in all respects. No other or additional notice need be given.
2. Exhibit 6-B to the Certification of No Response or Objection Regarding City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New $B$ Notes to Holders of Allowed Class 14 Claims Ender the City's Plan of Adjustment and (B) Granting Other Related Relief ("Certification," Docket Number 13568) contains a complete and exhaustive list of Allowed Class 14 Claims entitled to Distributions under Class 14 of the Plan. These are the only Allowed Class 14 Claims that will receive Distributions under Class 14 of the Plan.
3. The Pro Rata Distribution that the City proposes on Exhibit 6-B to Holders of Allowed Class 14 Claims has been computed in accordance with the requirements of the Plan.
4. After making the Distributions listed on Exhibit 6-B of the Certification and compliance with the Mosley Order, the City will have fully satisfied its obligation under the Plan to Distribute B Notes to Holders of Allowed Class 14 Claims.

## THE COURT ORDERS THAT:

5. The Motion is granted to the extent provided in this Order.
6. At least 14 calendar days prior to Distributing B Notes, the City is to file the revised Distribution Notice and its accompanying exhibits, as attached to the Certification.
7. The Distribution proposed on Exhibit 6-B to the Certification is authorized and approved.
8. Except as provided in paragraph 7 above and in the Mosley Order, no other Distribution of B Notes shall be made to the Holders of Allowed Class 14 Claims, no other alleged Holder of a Class 14 Claim shall be entitled to a Distribution under the Plan, and each such other alleged Holder of a Class 14 Claim shall be permanently estopped, barred, and enjoined from seeking a Distribution or any other relief from the City or any of its property.
9. The City and Disbursing Agent are authorized to make payments of accrued interest to the Holders of B Notes at any time and from time to time without further notice or order of the Court. Nothing in this Order shall affect the right of a Holder of an Allowed Class 14 Claim to receive accrued interest under its B Notes.
10. The reduction of the Disputed Unsecured Claims Reserve to $\$ 0$ is authorized and approved.
11. The $\$ 138$ in $B$ Notes that will remain after the Distribution proposed on Exhibit 6-B of the Certification is completed will revert to the City and become City property.
12. This Order is entered in furtherance of this Court's reserved jurisdiction to enter any orders that may be necessary or appropriate to implement or consummate the provisions of the Plan, and to ensure that Distributions to Holders of Claims are accomplished in accordance with the provisions of the Plan.
13. In implementing and enforcing the terms of this Order and the Plan, the City and its Related Entities are entitled to all privileges and protections of the Plan, including the exculpation set forth in-Article-H: $\mathbf{H}$.
14. This Order does not modify the Plan or the Confirmation Order. Each and every term and condition in the Plan and Confirmation Order, including, without limitation, those with respect to the Allowed Claims and Distributions, remains in full force and effect.
15. This Court retains jurisdiction over the interpretation and enforcement of this Order.

## EXHIBIT 1-A

## Redline to Proposed Order



## EXHIBIT 1

## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MLCHIGAN SOUTHERN DIVISION

In re:
City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846
Judge Thomas J. Tucker
Chapter 9

## ORDER (A) APPROVING FIRST AND FINAL DISTRIBUTION OF

 NEW B NOTES TOHOLDERS OF ALLOWED CLASS 14 CLAIMS UNDER THE CITY'S PLAN OF ADJUSTMENT AND (B) GRANTING OTHER RELATED RELIEFThis matter having come before the Court on the City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New $B$ Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief (the "Motion," Doc. No. $\quad 13521$ ); notice having been given by first-class mail to all known Holders of Class 14 Claims under the Planand ${ }_{z}$ all creditors and other parties in interest who requested notice or alleged Class 14 Claims, and others, and by ECF to all participants registered to receive notice in this bankruptcy case, and no further notice being necessary or required; no objections having been timely filed to the Motion; the Court being fully advised in the premises; and there being good and sufficient cause to grant the relief requested,

[^18]
## THE COURT FINDS THAT:

1. The flling and servie of the Metion satisfiescity's compliance with paragraph 6 of this Order will satisfy the City's obligation under the Plan to file a notice of the planned Distribution Date in all respects. No other or additional notice need be given.
2. Exhibit 6-B to the Metion Certification of No Response or Objection Regarding-City of Detroit's-Motion-for an Order-(4)-Approving-First and Final Distribution of New $B$ Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief ("Certification," Docket Number 13568) contains a complete and exhaustive list of Allowed Class 14 Claims entitled to a Distribut Distributions under Class 14 of the Plan. These are the only Allowed Class 14 Claims that will receive a DistributionDistributions under Class 14 of the Plan.
3. The Pro Rata Distribution that the City proposes on Exhibit 6-B to Holders of Allowed Class 14 Claims has been computed in accordance with the requirements of the Plan:
4. After making the Distributions listed on Exhibit 6-B of the Motion Certification and compliance with the Mosley Order, the City will have fully satisfied its obligation under the Plan to Distribute B Notes to Holders of Allowed Class 14 Claims.

13-53846-tjt Doc 13568 Filed 05/20/22 Entered 05/20/22 10:46:16 Page 11 of 25

## THE COURT ORDERS THAT:

5. The Motion is granted to the extent provided in its entiretythis Order.
6. At least 14 calendar days prior to Distributing B Notes, the City is to file the revised Distribution Notice and its accompanying exhibits, as attached to the Certification.
7. 6.The Distribution proposed on Exhibit 6-B to the MotionCertification $\cdots$ is authorized and approved.
8. 7.Except as provided in paragraph $6 \underline{1}$ above and in the Mosley Order, no other Distribution of B Notes shall be made to the Holders of Allowed Class 14 Claims, no other alleged Holder of a Class 14 Claim shall be entitled to a Distribution under the Plan, and each such other alleged Holder of a Class 14 Claim shall be permanently estopped, barred, and enjoined from seeking a Distribution or any other relief from the City or any of its property.
9. 8.The City and Disbursing Agent are authorized to make payments of accrued interest to the Holders of $B$ Notes at any time and from time to time without further notice or order of the Court. Nothing in this Order shall affect the right of a Holder of an Allowed Class 14 Claim to receive accrued interest under its B Notes.
10. 9-The reduction of the Disputed Unsecured Claims Reserve to $\$ 0$ is authorized and approved.

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11. 10. The $\$ 12438$ in $B$ Notes that will remain after the Distribution proposed on Exhibit 6-B of the MotionCertification is completed will revert to the City and become City property.
12. 11.-This Order is entered in furtherance of this Coutt's reserved jurisdiction to enter any orders that may be necessary or appropriate to implement or consummate the provisions of the Plan, and to ensure that Distributions to Holders - of Claims are aecomplished in aceordance-with the provisions of the-Plan.
13. 12-In implementing and enforcing the terms of this Order and the Plan, the City and its Related Entities are entitled to all privileges and protections of the Plan, including the exculpation set forth in Article III.D.6.
14. 13.This Order does not modify the Plan or the Confirmation Order. Each and every term and condition in the Plan and Confirmation Order, including, without limitation, those with respect to the Allowed Claims and Distributions, remains in full force and effect.
15. 44.-This Court retains jurisdiction over the interpretation and enforcement of this Order.

## EXFIBIT 6-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

# REVISED NOTICE OF <br> FIRSTAND FINAL DISTRIBUTION AND DISTRIBUTIONDATE ${ }^{*}$ 

## PLEASE READ THIS NOTICE CAREFULLY!

This is the Revised Notice of the City of Detroit's first and final distribution of B Notes with respect to Allowed Class 14 "Other Unsecured Claims" in its bankruptcy case. If you hold a Class 14 Unsecured Claim in the City's bankruptcy case, you should read this Notice carefully, as it contains information related to the treatment of these claims. (Please note that this Revised Notice only discusses the Distribution of $B$ Notes with respect to Allowed Class 14 Claims; accrued interest on the $B$ Notes will be paid on a future date or dates to the Holders of $B$ Notes.)

THIS REVISED NOTICE IS FOR INFORMATIONAL PURPOSES ONLY.

[^19]Exhibit 6-B $\mathbf{B}^{\mathbf{2}}$ to this Revised Notice contains a list of all Allowed Class 14 Claims that will receive Distributions of B Notes as required under the City's confirmed bankruptcy Plan. Exhibit 6-B specifies the amount of B Notes to be Distributed to each of the Holders of these claims. Because these B Notes were issued in two series with identical terms, Exhibit 6-B lists the amount of each to be Distributed. If the Bankruptcy Court approves the City's planned Distribution, the Distribution of B Notes to Allowed Class 14 Claimants is expected to begin on or about DATETO BE DETERMINEDI. Distributions will be made to the accounts previously identified by the Holders of these Allowed Class 14 Claims and may take a few days to complete. As required by an order of the Bankruptcy Court, ${ }^{3}$ if an attempt to Distribute B Notes to an account fails or is otherwise unsuccessful, the City will notify the Holder of the Claim so that the Claim Holder can take corrective action if needed or desired.

Exhibit 6-C contains a list of Claims that have been abandoned and that will not receive Distributions of B Notes. Holders of the Claims on Exhibit 6-C were contacted by mail several times but did not return the information necessary for the City to Distribute B Notes to them. As specified in an order of the Banktuptcy Court, ${ }^{4}$ all rights to Distributions on these Claims have been forfeited.

This is the final notice the City will file with respect to Distribution of $B$ Notes.

[^20]
## EXHIBIT 6-A-Redline

Redline to Distribution Notice

## EXFIBIT 6-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

## REVISED NOTICE OF <br> FIRSTANDEINAI DISTRIBUHION AND DISTRIRUTHONDATE

## PLEASE READ TEIS NOTICE CAREFULLY!

The Motion-distributed-with-thisthis is the Revised Notice isof the City of Detroit's-request to the Bankruptey Court for the Eastern-District of Minhigan to-approwe-its first and final distribution of $B$ Notes with respect to Allowed Class 14 "Other Unsecured Claims" in its bankruptcy case. If you hold a Class 14 Unsecured Claim in the City's bankruptcy case, you should read this Notice carefully, as it contains information related to the treatment of these claims. (Please note that this Revised Notice only discusses the dDistribution of B Notes with respect to Allowed Class 14 Claims; accrued interest on the B Notes will be paid on a future date or dates to the Holders of B Notes.)


[^21]
## THIS REVISED NOTICE IS FOR INFORMATIONAL PURPOSES ONLY.

Exhibit 6-B ${ }^{2}$ to this Revised Notice contains a list of all Allowed Class 14 Claims that will receive a Distributionistributions of B Notes as required under the City's confirmed bankruptcy Plan. Exhibit 6-B specifies the amount of B Notes to be Distributed to each of the Holders of these claims. Because these B Notes were issued in two series with identical terms, Exhibit 6-B lists the amount of each to be Distributed. If the Bankruptcy Court approves the City's planned Distribution, the Distribution of $B$ Notes to Allowed Class 14 Claimants is expected to begin on or about Maxy 9-2022 [DATE TOBEDETERMUNED]. Distributions will be made to the accounts previously identified by the Holders of these Allowed Class 14 Claims and may take a few days to complete. As required by an order of the Bankruptcy Court, ${ }^{23}$ if an attempt to Distribute B Notes to an account fails or is otherwise unsuccessful, the City will notify the Holder of the Claim so that the Claim Holder can take corrective action if needed or desired.

Exhibit 6-C contains a list of Claims that have been abandoned and that will not receive a DistributionDistributions of B Notes. Holders of the Claims on Exhibit 6-C were contacted by mail several times but did not return the information necessary for the City to Distribute B Notes to them. As specified in an order of the Bankruptcy Court, ${ }^{34}$ all rights to Distributions on these Claims have been forfeited.

This is the final notice the City will sendfile with respect to Distribution-of $B$ Notes. Tf you hold-a-Class-14 Claimin the City's baykraptey-case-and-expect-a Pistribution-of R Notes, you shonld roview Fwhibits 6 -B and $6-$ Cearefully! If your-Claim is either listed on Exhibit 6-G (the lint if forfeited-Clains) or simply not
 believe this to be in orror, you should-object or- therwise respond to the Motion as directed in the Notice of Opportunity to-Object to City of Detroit's Motion for an Order (A) Approwing First and Finat Distribution of New B Notes to Holders of

[^22]Allowed Claws 14 Clains Under the City's Plan of Adjustment and (B) Grafting: Other Related-Relief, attached as Exhibit 2 to the Motion.
Please be furthor-advised that if you-object, you-will need to explain-why you believe you are cntifled to a Distribution- Objections, for examplo, by clainants who simply failed-to return the forms required to receive-a Distribution-or-who-8therwise failed to-comply-with-requirements of the Cityss Plan or the orders of the-Banlaruptcy Court are milliely to-be suecessful. If you have reason to beliewe, howerer, that your-Claim was-omitted frem whibit 6-8 in erver, you should take this-last-andonly-oppertuity to objeet before the B Notes are Distributed. Nofurther Distributions-ofB Notes willbernade at any timoother than the Distributions identified in Fxhibit-6-B.

## EXHIBIT 6-B

## LIST OF PLANNED DISTRIBUTIONS TO HOLDERS OF ALLOWED CLASS 14 CLAIMS AND BRIEF SUMIMARY OF REVISIONS

## Summary of Revisions

1. Order entered at Docket Number 13567 provides that the City will reserve notes for claim number 843. This results in a reserve for claim 843 (face value $\$ 280,000$ ) being added at the bottom of Exhibit 6-B. Correspondingly, this amount is added to the total amount of claims. Claim 843 represents $0.13 \%$ of total claims.
2. Orders entered at Docket Numbers 13530, 13554, and 13556 added lines for claim numbers 1189,2403 , and 2859 to Exhibit 6-B. These changes, along with the change in the preceding paragraph, mean that claims on Exhibit 6-B receiving a distribution now represent $98.3 \%$ of all Allowed Class 14 Claims, an increase from the $95.9 \%$ shown on the original exhibit. Correspondingly, forfeited claims represent $1.57 \%$ of the total, down from the $4.07 \%$ shown previously.
3. As a result the addition of claim number 843, all other claims experienced minor reductions as the $B$ Notes are distributed pro rata. For example, the first claim on the list, claim number 12 held by Jessie Payne, was originally scheduled to receive $\$ 285,712$ in face value of $B$ Notes. This claim's pro rata share ofB Notes falls to $\$ 285,340$ after inclusion of claim number 843 , a decrease of $\$ 372$. The distribution of B Notes to the next claim, claim number 13, decreases only $\$ 10$ because it is significantly smaller than claim number 12.
4. The rounding effects are slightly different after all of the calculations are complete. Thus, where the first set of calculations had $\$ 124$ in face value of $B$ Notes left undistributable, the revised calculation has $\$ 138$ in face value of $B$ Notes undistributable.
New B Notes to Be Distributed to Claimants

New B Notes to Be Distributed to Clalmants

New B Notes to Be Distributed to Claimants


* B Notes can only be distributed in whole dollar increments, and distributions must reflect that. This leaves a small amount of left over notes that cannot be distributed.


## EXHIBIT 6-C

# LIST OF HOLDERS OF ALLOWED CLASS 14 CLATMS THAT DID NOT COMPLY WITH THE BROKERAGE ORDER AND WHOSE CLAIMS HAVE BEEN DISALLOWED AND EXPUNGED AND BRIEF SUMMARY OF REVISIONS 

## Summary of Revisions

1. Orders entered at Docket Numbers 13530 and 13554 resulted in claim numbers 1189 and 2403 being markedly reduced on Exhibit 6-C and claim number 2859 being removed from Exhibit 6-C.
2. As a result, whereas claims in the total amount of $\$ 8,745,272.12$ had been listed as having been forfeited on Exhibit 6-C, the revised Exhibit 6-C now shows $\$ 3,381,622.12$ in claims forfeited. This represents a reduction of $\$ 5,363,650$.

## Exhibit G

## SOUTHERN DIVISION

In re:
City of Detroit, Michigan, Debtor.

Case No. 13-53846
Judge Thomas J. Tucker
Chapter 9

## ORDER (A) APPROVING FIRST AND FINAL DISTRIBUTION OF

NEW B NOTES TO HOLDERS OF ALLOWED CLASS 14 CLAIMS
UNDER THE CITY'S PLAN OF ADJUSTMENT AND
(B) GRANTING OTHER RELATED RELIEF

This case is before the Court on the motion entitled "City of Detroit's

Motion for an Order (A) Approving First and Final Distribution of New B Notes to

Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B)

Granting Other Related Relief" (Docket \# 13521, the "Motion"). ${ }^{1}$ Notice having been given by first-class mail to all known Holders of Class 14 Claims under the Plan, all creditors and other parties in interest who requested notice or alleged Class 14 Claims, and others, and by ECF to all participants registered to receive notice in this bankruptcy case, and no further notice being necessary or required; no timely objections having been filed to the Motion; and the Court finding good cause to enter this Order,

[^23]
## THE COURT FINDS THAT:

1. The City's compliance with paragraph 6 of this Order will satisfy the City's obligation under the Plan to file a notice of the planned Distribution Date in all respects. No other or additional notice need be given.
2. Exhibit 6-B to the certification filed by the City of Detroit on May 20, 2022, entitled "Certification of No Response or Objection Regarding City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief" (Docket \# 13568, the "Certification") contains a complete and exhaustive list of Allowed Class 14 Claims entitled to Distributions under Class 14 of the Plan. These are the only Allowed Class 14 Claims that will receive Distributions under Class 14 of the Plan.
3. The Pro Rata Distribution that the City proposes on Exhibit 6-B to Holders of Allowed Class 14 Claims has been computed in accordance with the requirements of the Plan.
4. After making the Distributions listed on Exhibit 6-B of the Certification and compliance with the Mosley Order, the City will have fully satisfied its obligation under the Plan to Distribute B Notes to Holders of Allowed Class 14 Claims.

## IT IS ORDERED THAT:

5. The Motion is granted to the extent provided in this Order.
6. At least 14 calendar days prior to Distributing B Notes, the City must file the revised Distribution Notice and its accompanying exhibits, as attached to the Certification.
7. The Distribution proposed on Exhibit 6-B to the Certification is authorized and approved.
8. Except as provided in paragraph 7 above and in the Mosley Order, no other Distribution of B Notes will be made to the Holders of Allowed Class 14 Claims, no other alleged Holder of a Class 14 Claim will be entitled to a Distribution under the Plan, and each such other alleged Holder of a Class 14 Claim will be permanently estopped, barred, and enjoined from seeking a Distribution or any other relief from the City or any of its property.
9. The City and Disbursing Agent are authorized to make payments of accrued interest to the Holders of B Notes at any time and from time to time without further notice or order of the Court. Nothing in this Order will affect the right of a Holder of an Allowed Class 14 Claim to receive accrued interest under its B Notes.
10. The reduction of the Disputed Unsecured Claims Reserve to $\$ 0$ is authorized and approved.
11. The $\$ 138$ in $\mathbf{B}$ Notes that will remain after the Distribution proposed on Exhibit 6-B of the Certification is completed will revert to the City and become City property.
12. This Order is entered in furtherance of this Court's reserved jurisdiction to enter any orders that may be necessary or appropriate to implement or consummate the provisions of the Plan, and to ensure that Distributions to Holders of Claims are accomplished in accordance with the provisions of the Plan.
13. In implementing and enforcing the terms of this Order and the Plan, the City and its Related Entities are entitled to all privileges and protections of the Plan, including the exculpation set forth in Article III.D.6.
14. This Order does not modify the Plan or the Confirmation Order. Each and every term and condition in the Plan and Confirmation Order, including, without limitation, those with respect to the Allowed Claims and Distributions, remains in full force and effect.
15. This Court retains jurisdiction over the interpretation and enforcement of this Order.

Signed on May 20, 2022


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
March 16, 2022


[^0]:    ${ }^{1}$ Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (October 22, 2014), filed on October 22, 2014 [Doc. No. 8045], and confirmed as modified on November 12, 2014 [Doc. No. 8272] ("Plan"). Undefined capitalized terms in this Motion have the meanings assigned to them in the Plan.
    ${ }^{2}$ City of Detroit's Motion to Implement Distributions of B Notes to Holders of Allowed Class 14 Claims Under the City's Confirmed Plan of Adjustment ("Brokerage Motion," Doc. No. 13126).

[^1]:    ${ }^{3}$ Order Granting the City of Detroit's Motion to Implement Distributions of B Notes to Holders of Allowed Class 14 Claims Under the City's Confirmed Plan of Adjustment ("Brokerage Order," Doc. No. 13173).
    ${ }^{4}$ City of Detroit's Motion to Establish Procedures for Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment ("Procedures Motion," Doc. No. 13476).
    ${ }^{5}$ Order Granting City of Detroit's Motion to Establish Procedures for Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment ("Procedures Order," Doc. No. 13488).

[^2]:    ${ }^{6}$ Granting this Motion will also have the effect of approving the City's notice reducing its Disputed Unsecured Claims Reserve to $\$ 0$, which is being filed contemporaneously with this Motion. The determination of the reserve is dependent upon approval of the planned Distribution.

[^3]:    ${ }^{7}$ The B Notes were issued in two series to provide for interest payment timing and transfer restrictions that were effective until October 1, 2015. The 2014B-1 Notes and the 2014B-2 Notes accrue the same interest and have the same terms.

[^4]:    ${ }^{8}$ As of the filing date of the Procedures Motion, Holders of only 75 claims (inclusive of the Detroit Police Officers Association) had or were expected to timely return brokerage and tax information. Procedures Motion, $\mathbb{1}$ 23. Since that time, the City was able to qualify five additional claims under the authority granted to it by the Brokerage Order. See Brokerage Order, $\mathbb{\|} 7$ (allowing the City to modify deadlines as needed to assist Holders of Allowed Claims who are working with the City in good faith to provide tax and brokerage information).

[^5]:    ${ }^{9}$ As the City noted in the Procedures Motion, it may take the Disbursing Agent more than a single day to complete the B Notes transfers. Procedures Motion, p. 2.

[^6]:    ${ }^{10}$ This request is limited solely to Distributions of B Notes to Holders of Allowed Class 14 Claims. It does not include the accrued interest income on the B Notes, as this interest will be paid in a future disbursement. The proposed Order also requests that the City and its Disbursing Agent be authorized to pay accrued and accruing interest to the Holders of the B Notes at any time and from time to time without further notice or order of this Court.

[^7]:    ${ }^{1}$ Capitalized terms used but not otherwise defined in this Order have the meanings given to them in the Motion.

[^8]:    ${ }^{1}$ Response or answer must comply with Fed. R. Civ. Proc. 8(b), (c) and (e).

[^9]:    ${ }^{1}$ Capitalized terms that are not defined in this Notice have the meanings given to them in the City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief, to which this Notice is attached. Many of the terms referenced in that motion may be found in the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (October 22, 2014), filed on October 22, 2014 (Docket Number 8045), as modified and confirmed on November 12, 2014 (Docket Number 8272) (collectively, the "Plan"). The documents referenced here by Docket Number are available free of charge at the City of Detroit's bankruptcy website as maintained by Kurtzman Carson Consultants, LLC. That website may be accessed at http://www.kccllc.net/Detroit.

[^10]:    ${ }^{2}$ Order Granting City of Detroit's Motion to Establish Procedures for Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment (Docket Number 13488).
    ${ }^{3}$ Order Granting the City of Detroit's Motion to Implement Distributions of B Notes to Holders of Allowed Class 14 Claims Under the City's Confirmed Plan of Adjustment (Docket Number 13173).

[^11]:    ${ }^{1}$ Response or answer must comply with Fed. R. Civ. Proc. 8(b), (c) and (e). -2-

[^12]:    ${ }^{1}$ Capitalized terms that are not defined in this Notice have the meanings given to them in the City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief, to which this Notice is attached. Many of the terms referenced in that motion may be found in the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (October 22, 2014), filed on October 22, 2014 (Docket Number 8045), as modified and confirmed on November 12, 2014 (Docket Number 8272) (collectively, the "Plan"). The documents referenced here by Docket Number are available free of charge at the City of Detroit's bankruptcy website as maintained by Kurtzman Carson Consultants, LLC. That website may be accessed at http://www.kccllc.net/Detroit.

[^13]:    ${ }^{2}$ Order Granting City of Detroit's Motion to Establish Procedures for Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment (Docket Number 13488).
    ${ }^{3}$ Order Granting the City of Detroit's Motion to Implement Distributions of B Notes to Holders of Allowed Class 14 Claims Under the City's Confirmed Plan of Adjustment (Docket Number 13173).

[^14]:    ${ }^{1}$ The last service occurred on April 12, 2022, by U.S. first class mail, and thus the deadline to object was April 30, 2022. No objections were filed by that date.

[^15]:    ${ }^{2}$ Undefined capitalized terms have the meanings assigned to them in the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (October 22, 2014), filed on October 22, 2014 [Doc. No. 8045], and confirmed as modified on November 12, 2014 [Doc. No. 8272] ("Plan").

[^16]:    ${ }^{3}$ The City normally would provide redlines of the exhibit revisions, but because the Distribution to each and every claimant has been revised very slightly to account for the omitted Claim noted above, redlines proved to be voluminous and unhelpful.

[^17]:    ${ }^{1}$ Capitalized terms used but not otherwise defined in this Order have the meanings given to them in the Motion.

[^18]:    ${ }^{1}$ Capitalized terms used but not otherwise defined in this Order have the meanings given to them in the Motion.

[^19]:    ${ }^{1}$ Capitalized terms that are not defined in this Notice have the meanings given to them in the City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief, filed at Docket Number 13521. Many of the terms referenced in that motion may be found in the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (October 22, 2014), filed on October 22, 2014 (Docket Number 8045), as modified and confirmed on November 12, 2014 (Docket Number 8272) (collectively, the "Plan"). The documents referenced here by Docket Number are available free of charge at the City of Detroit's bankruptcy website as maintained by Kurtzman Carson Consultants, LLC. That website may be accessed at http://www.kccllc.net/Detroit.

[^20]:    ${ }^{2}$ To reduce confusion, exhibit numbers to this Revised Notice use the same numbering as was used in the original Notice.
    ${ }^{3}$ Order Granting City of Detroit's Motion to Establish Procedures for Distribution of New $B$ Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment (Docket Number 13488).
    ${ }^{4}$ Order Granting the City of Detroit's Motion to Implement Distributions of B Notes to Holders of Allowed Class 14 Claims Under the City's Confirmed Plan of Adjustment (Docket Number 13173).

[^21]:    ${ }^{1}$ Capitalized terms that are not defined in this Notice have the meanings given to them in the City of Detroit's Motion for an Order (A) Approving First and Final Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and (B) Granting Other Related Relief, to which this-Netiee is attachedfiled at Docket Number 13521. Many of the terms referenced in that motion may be found in the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (October 22, 2014), filed on October 22, 2014 (Docket Number 8045), as modified and confirmed on November 12, 2014 (Docket Number 8272) (collectively, the "Plan"). The documents referenced here by Docket Number are available free of charge at the City of Detroit's bankruptcy website as maintained by Kurtzman Carson Consultants, LLC. That website may be accessed at http://www.kccllc.net/Detroit.

[^22]:    ${ }^{2}$ To reduce confusion, exhibit numbers to this Revised Notice use the same numbering as was used in the original Notice.
    ${ }^{23}=$ Order Granting City of Detroit's Motion to Establish Procedures for Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment (Docket Number 13488).
    34 Order Granting the City of Detroit's Motion to Implement Distributions of $B$ Notes to Holders of Allowed Class 14 Claims Under the City's Confirmed Plan of Adjustment (Docket Number 13173).

[^23]:    ${ }^{1}$ Capitalized terms used but not otherwise defined in this Order have the meanings given to them in the Motion.

