

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

In re:  City of Detroit, Michigan,  Debtor.
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Bankruptcy Case No. 13-  
53846 Judge Thomas J. Tucker  
Chapter 9

***EX PARTE* MOTION FOR ENTRY OF AN ORDER AUTHORIZING A  
BRIEF IN EXCESS OF THE PAGE LIMIT**

The Police and Fire Retirement System of the City of Detroit, by its undersigned counsel, Clark Hill PLC, files this *ex parte* motion for entry of an order authorizing PFRS to file a brief in response to the City's *Motion to Enforce Plan of Adjustment and Require 30-Year Amortization of the UAAL in the Police and Fire Retirement System Pension Plan* [Doc 13602], as follows:

1. The City of Detroit Police and Fire Retirement System ("PFRS") recently adopted (over the City's objections) a resolution providing that the plan's unfunded actuarial accrued liability ("UAAL") for retirement benefits, existing as of June 30, 2023, be amortized over 20 years. The Plan of Adjustment ("POA") and the order confirming it ("Confirmation Order") provide that the proper period is 30 years. A 20-year amortization will require the City to pay additional hundreds of millions of dollars in front-loaded funding over the amounts that would be due under 30-year amortization (and under the original projections in the POA).



2. PFRS has prepared response to the motion which it is prepared to file with this Court. However, the length of the PFRS's brief exceeds the 25-page limit provided by Local Bankruptcy Rule 9014-1(f).

3. In view of the complexity and the importance of the issues address by the City's brief, PFRS requests the length of the response brief be extended to 40 pages.

WHEREFORE PFRS respectfully requests that the Court enter an order, substantially in the form attached as **Exhibit 1**, granting PFRS an enlargement of the page limit from 25 to 40 pages for its brief.

Respectfully submitted,

Date: September 9, 2022

By: /s/ Jennifer K. Green  
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*Attorney for Creditor – PFRS*

## **SUMMARY OF ATTACHMENTS**

The following documents are attached to this Motion, labeled in accordance with E.D. Mich. LBR 9014-1(c).

Exhibit 1 Proposed Form of Order

Exhibit 2 None [Motion Seeks Ex Parte Relief]

Exhibit 3 None [Brief Not Required]

Exhibit 4 Certificate of Service

Exhibit 5 None

Exhibit 6 None

**EXHIBIT 1 – PROPOSED ORDER**

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**PROPOSED ORDER GRANTING *EX PARTE* MOTION FOR ENTRY OF  
AN ORDER AUTHORIZING A BRIEF IN EXCESS OF THE PAGE LIMIT**

This matter coming before the Court on the Ex Parte Motion of the City of Detroit Police and Fire Retirement System (“PFRS”) for Entry of an Order Authorizing a Brief in Excess of the Page Limit, and the Court finding good cause for the entry of this Order; and the Court being fully advised in the premises;

**THE COURT ORDERS THAT** the page limit on the *Response to the City of Detroit’s Motion to Enforce Plan of Adjustment and Require 30-Year Amortization of the UAAL in the Police and Fire Retirement System Pension Plan* is increased from 25 pages to 40 pages.

**EXHIBIT 2 – NONE**

**EXHIBIT 3 – NONE**

**EXHIBIT 4 – CERTIFICATE OF SERVICE**

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 9, 2022, she served a copy of the foregoing *Ex Parte Motion for Entry of an Order Authorizing a Brief in Excess of the Page Limit* with the Clerk of the Court via the Court's ECF electronic filing system which will provide notice of the filing to all registered participants in this matter.

Respectfully submitted,

Date: September 9, 2022

By: /s/ Jennifer K. Green  
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**EXHIBIT 5 – NONE**



**EXHIBIT 6 – NONE**