

## **EXHIBIT6.2**

**Notice of Pendency of Bankruptcy Case and Application of the Stay  
in *Catherine Phillips, et al. v. Richard Snyder and Andrew Dillon*,  
Case No. 13-CV-11370  
[Doc. #29]**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

CATHERINE PHILLIPS, Staff Representative  
Michigan AFSCME Council 25, and Chief  
Negotiator with the City of Detroit; JOSEPH  
VALENTI, Co-Chief Negotiator with the  
Coalition of Unions of the City of Detroit;  
MICHIGAN AFSCME COUNCIL 25; RUSS  
BELLANT, President of the Detroit Library  
Commission; TAWANNA SIMPSON, LAMAR  
LEMMONS, ELENA HERRADA, Detroit  
Public School Board Members; DONALD  
WATKINS AND KERMIT WILLIAMS,  
Pontiac City Council Members; DUANE  
SEATS, DENNIS KNOWLES, JUANITA  
HENRY AND MARY ALICE ADAMS, Benton  
Harbor Commissioners; WILLIAM "SCOTT"  
KINCAID, Flint City Council President;  
BISHOP BERNADEL JEFFERSON; PAUL  
JORDAN; REV. JIM HOLLEY, National  
Board Member, Rainbow Push Coalition; REV.  
CHARLES E. WILLIAMS II, Michigan  
Chairman, National Action Network; REV.  
DR. MICHAEL A. OWENS, REV.  
LAWRENCE GLASS, REV. DR. DEEDEE  
COLEMAN, BISHOP ALLYSON ABRAMS,  
Executive Board, Council of Baptist Pastors of  
Detroit and Vicinity,

Plaintiffs,

v

RICHARD D. SNYDER, as Governor of the  
State of Michigan, and ANDREW DILLON, as  
the Treasurer of the State of Michigan, acting  
in their individual and/or official capacities,

Defendants.

---

No. 2:13-cv-11370

HON. GEORGE CARAM STEEH

MAG. R. STEVEN WHALEN

**NOTICE OF PENDENCY OF  
BANKRUPTCY CASE AND  
APPLICATION OF THE  
AUTOMATIC STAY**

Herbert A. Sanders (P43031)  
The Sanders Law Firm PC  
Attorney for Plaintiffs  
615 Griswold Street, Suite 913  
Detroit, Michigan 48226  
313.962.0099  
[haslaw@earthlink.net](mailto:haslaw@earthlink.net)

Julie H. Hurwitz (P34720)  
William H. Goodman (P14173)  
Goodman & Hurwitz PC  
Attorneys for Plaintiffs  
1394 East Jefferson Avenue  
Detroit, Michigan 48207  
313.567.6170  
[jhurwitz@goodmanhurwitz.com](mailto:jhurwitz@goodmanhurwitz.com)  
[goodman@goodmanhurwitz.com](mailto:goodman@goodmanhurwitz.com)

Darius Charney  
Ghita Schwarz  
Center for Constitutional Rights  
Attorneys for Plaintiffs  
666 Broadway, 7<sup>th</sup> Floor  
New York, New York 10012  
212.614.6464  
[dcharney@ccrjustice.org](mailto:dcharney@ccrjustice.org)

Betram L. Marks (P47829)  
Litigation Associates PLLC  
Attorney for Plaintiffs  
30300 Northwestern Hwy, Ste 240  
Farmington Hills, Michigan 48334  
248.737.4444  
[bertrammarks@aol.com](mailto:bertrammarks@aol.com)

Denise C. Barton (P41535)  
Ann M. Sherman (P67762)  
Michael F. Murphy (P29213)  
Assistant Attorneys General  
Attorneys for Defendants  
P.O. Box 30736  
Lansing, Michigan 48909  
517.373.6434

John C. Philo (P52721)  
Anthony D. Paris (P71525)  
Sugar Law Center  
Attorneys for Plaintiffs  
4605 Cass Ave., 2<sup>nd</sup> Floor  
Detroit, Michigan 48201  
313.993.4505  
[jphilo@sugerlaw.org](mailto:jphilo@sugerlaw.org)  
[tparis@sugarlaw.org](mailto:tparis@sugarlaw.org)

Richard G. Mack, Jr. (P58657)  
Keith D. Flynn (P74192)  
Miller Cohen PLC  
Attorneys for Plaintiffs  
600 West Lafayette Blvd., 4<sup>th</sup>  
Floor  
Detroit, Michigan 48226  
313.964.4454  
[richardmack@millercohen.com](mailto:richardmack@millercohen.com)

Cynthia Heenan (P53664)  
Hugh M. Davis, Jr. (P12555)  
Constitutional Litigation  
Associates PC  
Attorneys for Plaintiffs  
450 West Fort St, Ste 200  
Detroit, Michigan 48226  
313.961.2255  
[conlitpc@sbcglobal.net](mailto:conlitpc@sbcglobal.net)

**NOTICE OF PENDENCY OF BANKRUPTCY CASE AND  
APPLICATION OF THE AUTOMATIC STAY**

On July 18, 2013, the City of Detroit, Michigan filed a petition for relief under Chapter 9 of Title 11 of the United States Code. (Document 1, *In re City of Detroit, Michigan*, Case No. 13-53846, (Bankr. E.D. Mich.)) In accordance with the automatic stay imposed by operation of §§ 362 and 922 of the Bankruptcy Code, 11 U.S.C. §362 and 922, no cause of action filed prior to, or relating to the period prior to, the Petition Date may be continued or commenced against (i) the City and/or its employees, or (ii) an officer, employee, or inhabitant of the City, in any judicial, administrative or other court or tribunal to enforce a claim against the City without the Bankruptcy Court first issuing an order lifting or modifying the Stay for such specific purpose. Further, no related judgment or order may be entered or enforced against the City without the Bankruptcy Court first issuing an order lifting or modifying the State for such specific purpose.

On July 25, 2013, the provisions of this automatic stay were extended in all respects (to the extent not otherwise applicable) to include certain "State Entities" defined as "the Governor, the State Treasurer and the members of the Loan Board, collectively with the State Treasurer and the Governor, and together with each entity's staff, agents and representatives." (Exhibit 1). Governor Snyder and Treasurer Dillon are named Defendants in the captioned matter which was filed prior to the Petition Date and which is subject to this Bankruptcy Court Order extending the automatic stay.

Actions taken while this Stay is in effect and/or in violation of this Stay, including proceedings in this case, are void and without effect.

The Bankruptcy Court for the Eastern District of Michigan has not issued an order lifting or modifying the Stay for the specific purpose of allowing any party in the captioned case to continue this action against the Governor or Treasurer.

Under these circumstance, the above-captioned proceeding may not be prosecuted, and no valid judgment or order may be entered or enforced against these "certain State Entities."

These certain "State Entities" will not defend against, or take any other action with respect to, the above-captioned proceeding while the Stay remains in effect.

These certain "State Entities" hereby expressly reserve all rights with respect to the above-captioned proceeding, including, but not limited to, the right to move to vacate any judgment entered in the above-captioned proceeding as void.

Respectfully submitted,

BILL SCHUETTE  
Attorney General

*s/Denise C. Barton*  
Denise C. Barton (P41535)  
Ann M. Sherman (P67762)  
Michael F. Murphy (P29213)  
Assistant Attorneys General  
Attorneys for Defendants  
P.O. Box 30736  
Lansing, Michigan 48909  
517.373.6434  
Email: [bartond@michigan.gov](mailto:bartond@michigan.gov)  
P41535

Dated: August 7, 2013

**CERTIFICATE OF SERVICE**

I hereby certify that on August 7, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such. I also mailed the foregoing paper via US Mail to all non-ECF participants.

*s/Denise C. Barton*

Denise C. Barton (P41535)

Assistant Attorney General

Attorney for Defendants

P.O. Box 30736

Lansing, Michigan 48909

517.373.6434

E-mail: [bartond@michigan.gov](mailto:bartond@michigan.gov)