

**EXHIBIT 1**  
**Proposed Order**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**ORDER ESTABLISHING PRE-TRIAL AND TRIAL PROCEDURES  
AND SETTING ADDITIONAL HEARINGS**

This matter having come before the Court on the motion of the Debtor, and the Court being otherwise advised in the premises;

**IT IS HEREBY ORDERED** as follows:

1. Any party that objects to the Debtor's Post-Petition Financing Motion shall, not later than 5:00 p.m. on November 29, 2013, file and serve on the Debtor a list of (i) all witnesses that the objector will or may call at the hearing on the Post-Petition Financing Motion; and (ii) all exhibits that the objector will or may seek to have admitted at the hearing. Not later than November 29, 2013 at

5:00 p.m., the City shall file and serve on all known objectors a document listing of all exhibits that the City may seek to have admitted at the hearing.

2. Any witnesses who will or may be called at the hearing on the Post-Petition Financing Motion shall be made available for deposition so that such depositions can be completed no later than December 9, 2013.

3. Any objector that wishes to address the scope of the Court's review of the Post-Petition Financing Motion under 11 U.S.C. § 364(c) shall do so as part of its objection to the Post-Petition Financing Motion. The City's response, if any, regarding the scope of the Court's review of the Post-Petition Financing shall be included in its responses to objections. Nothing herein shall modify the dates already set for objections and responses to the Post-Petition Financing Motion or the page limits for such briefs.

4. By December 6, 2013, the Debtor and the objectors shall prepare and file with the Court (1) a joint, consolidated exhibit list, indicating with respect to each exhibit (a) which party seeks its admission; (b) whether the parties stipulate to the authenticity of the exhibit; and (c) whether any party objects to the admission of the exhibit, and on what grounds; and (2) a joint statement of stipulated facts as to each of the Assumption Motion and the Post-Petition Financing Motion.

5. The hearings on the Assumption Motion and the Post-Petition Financing Motion shall be consolidated, so that any witness who is called with respect to both Motions will be called to the stand only once, for all purposes. An exhibit that is admitted with respect to either Motion shall be deemed admitted with respect to both Motions.

6. The Debtors shall be allotted seven hours at the consolidated hearing, and the objectors, collectively, shall be allotted eight hours.

7. The objectors shall make a good faith effort to designate one attorney to act as lead counsel for the objectors. If the designation of a single lead counsel is not feasible, the objectors shall organize themselves into groups and shall designate up to three attorneys to act as lead counsel for the respective groups. The attorney(s) designated as lead counsel shall serve as the principal attorney(s) for the group at trial in presenting arguments, making objections, conducting examination of witnesses, and generally organizing and coordinating the work of the other attorneys on the trial team. The identity of the attorney(s) designated to serve as lead counsel shall be disclosed to the Court and the Debtor no later than December 6, 2013.

8. The Debtor's motion to intervene in the adversary proceeding captioned *Syncora v. UBS AG et al.*, referred to this Court on November 19, 2013 (the "Adversary Proceeding"), shall be heard on December 4, 2013.

9. Reply briefs in support of the defendants' motion to dismiss the Adversary Proceeding shall be filed on or before December 5, 2013. The defendants' motion to dismiss the Adversary Proceeding shall be heard immediately prior to the start of the consolidated hearing on the Assumption Motion and Post-Petition Financing Motion on December 10, 2013.