

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

In re )  
 ) Chapter 9  
 )  
CITY OF DETROIT, MICHIGAN, ) Case No. 13-53846  
 )  
Debtor. ) Hon. Steven W. Rhodes  
 )  
 ) **Expedited Consideration**  
 ) **Requested**

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***EX PARTE* MOTION FOR SHORTENED NOTICE AND EXPEDITED  
HEARING ON MOTION OF THE OBJECTORS FOR ADJOURNMENT  
OF THE HEARING REGARDING THE DEBTOR’S MOTION FOR  
ENTRY OF AN ORDER, PURSUANT TO SECTION 105(a) OF THE  
BANKRUPTCY CODE AND BANKRUPTCY RULE 9019, APPROVING A  
SETTLEMENT AND PLAN SUPPORT AGREEMENT AND GRANTING  
RELATED RELIEF**

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The Objectors<sup>1</sup> submit this *Ex Parte* Motion for Shortened Notice and Expedited Hearing on the *Motion of the Objectors for Adjournment of the Hearing Regarding the Debtor’s Motion for Entry of an Order, Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019, Approving a Settlement and Plan Support Agreement and Granting Related Relief* (the “Motion to Adjourn”) and respectfully represent as follows:

**Jurisdiction and Venue**

1. The Court has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334. Venue is proper in this district under 28 U.S.C. §§ 1408 and 1409.

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<sup>1</sup> Capitalized terms not defined herein have the meanings given to them in the Objectors’ Motion to Adjourn.

### Relief Requested and Basis for Relief

2. Pursuant to Bankruptcy Rule 9006(c) and Local Bankruptcy Rule 9006-1(b), this Court may, *ex parte*, shorten the notice period provided by Local Bankruptcy Rule 9014-1 for a party to take any action or file any paper. Fed. R. Bankr. P. 9006(c); E.D. Mich. LBR 9006-1(b).

3. The Objectors respectfully request that, pursuant to Bankruptcy Rule 9006(a) and Local Bankruptcy Rule 9006-1(b), the Court shorten the notice period with respect to the Motion to Adjourn and schedule an expedited hearing on the Motion to Adjourn on **April 2, 2014**.

4. Contemporaneously with the filing of this *Ex Parte* Motion, the Objectors filed the Motion to Adjourn. For the reasons stated in the Motion to Adjourn, the Objectors seek the entry of an order adjourning the hearing on the City's Settlement Motion until a date on or around the hearing on the Disclosure Statement, currently scheduled for April 14, 2014.

5. The hearing on the Settlement Motion is currently scheduled for April 3, 2014. In order to consider the Objectors' Motion to Adjourn prior to the scheduled time for the evidentiary hearing in connection with the Settlement Motion, the notice period with respect to the Motion to Adjourn must be shortened. The Objectors suggest that their Motion to Adjourn be heard one day prior to the scheduled evidentiary hearing, April 2, 2014 at 9:00 am.

6. The Court has currently scheduled hearings for April 2, 2014 in connection with the Order to Show Cause Why Expert Witnesses Should Not Be Appointed [Doc. No. 3170] and the Notice of Presentment of Order by Debtor in Possession City of Detroit, Michigan [Doc. No. 2921].

7. The Objectors will serve this *Ex Parte* Motion to the parties in the above-captioned proceedings and will provide notice of the *ex parte* order upon issuance pursuant to E.D. Mich. LBR 9006-1(b).

### **Conclusion**

WHEREFORE, The Objectors respectfully request that the Court enter an Order, substantially in the form attached as Exhibit 1, granting the relief requested in this *Ex Parte* Motion and granting such further relief as this Court deems appropriate.

*[Remainder of this page intentionally left blank]*

Dated: March 28, 2014

Respectfully submitted,

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**Exhibit 1**  
**Proposed Order**



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

In re	)
	) Chapter 9
	)
CITY OF DETROIT, MICHIGAN,	) Case No. 13-53846
	)
Debtor.	) Hon. Steven W. Rhodes
	)

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**ORDER GRANTING *EX PARTE* MOTION FOR SHORTENED NOTICE  
AND EXPEDITED HEARING ON MOTION OF THE OBJECTORS FOR  
ADJOURNMENT OF THE HEARING REGARDING THE DEBTOR’S  
MOTION FOR ENTRY OF AN ORDER, PURSUANT TO SECTION 105(a)  
OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 9019,  
APPROVING A SETTLEMENT AND PLAN SUPPORT AGREEMENT  
AND GRANTING RELATED RELIEF**

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This matter having come before the Court on the motion (the “*Ex Parte Motion*”) of the Objectors for the entry of an order shortening the notice period and scheduling an expedited hearing on the *Motion of the Objectors for Adjournment of the Hearing Regarding the Debtor’s Motion for Entry of an Order, Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019, Approving a Settlement and Plan Support Agreement and Granting Related Relief* (the “Motion to Adjourn”), the Court having reviewed the Objectors’ *Ex Parte Motion*; and the Court having determined that the legal and factual bases set forth in the motion establish just cause for the relief granted herein;

**IT IS HEREBY ORDERED THAT:**

1. The Objectors’ *Ex Parte Motion* is GRANTED.

2. The hearing with respect to the Objectors' Motion to Adjourn shall be held on April 2, 2014 before Hon. Steven Rhodes.

3. The joining Objectors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the motion.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

**IT IS SO ORDERED.**

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STEVEN W. RHODES  
United States Bankruptcy  
Judge