

**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
)
)

**EX PARTE MOTION FOR ENTRY OF AN ORDER AUTHORIZING
OBJECTORS TO FILE AN OBJECTION IN EXCESS OF PAGE LIMITS**

Certain objectors¹ (the “Objectors”), creditors and parties in interest in the above-captioned case, hereby move the Court (the “Motion”) for the entry of an order authorizing Objectors to file an objection (the “Objection”) to the Motion of the City of Detroit for Approval of the Proposed Disclosure Statement [Dkt. No. 2713] (the “Disclosure Statement Motion”) in excess of the page limits imposed by Local Bankruptcy Rule 9014-1(e) (20 pages) and Local Rule 7.1(d)(3) (25 pages), to the extent these page limits apply to the Objection. In support of this Motion, Objectors state as follows:

1. On February 21, 2014, the City filed the Disclosure Statement with Respect to Plan for Adjustment of Debts of the City of Detroit [Dkt. No. 2709]. Contemporaneously with the Disclosure Statement, the City also filed the Disclosure Statement Motion for the entry of an order approving the Disclosure Statement. On March 31, 2014, the City

¹ Hypothekbank Frankfurt AG; Hypothekbank Frankfurt International S.A.; Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A.; Deutsche Bank AG, London; Dexia Crédit Local; Dexia Holdings, Inc.; and FMS Wertmanagement AöR.

filed an Amended Disclosure Statement with Respect to Amended Plan for the Adjustment of Debts of the City of Detroit [Dkt. No. 3382] (the “Amended Disclosure Statement”).

2. Local Rule 7.1(d)(3)(A), arguably made applicable in this case by Local Bankruptcy Rule 9029-1(a), states that an objection may not exceed 25 pages.² Local Bankruptcy Rule 9014-1 may impose a 20-page limit for the objections. Out of an abundance of caution, Objectors submit that authority to exceed the page limitations under both rules in connection with the Objection is reasonable and appropriate under the circumstances.

3. The Amended Disclosure Statement and Disclosure Statement Motion raise numerous legal issues. Combined, the Amended Disclosure Statement, the Disclosure Statement Motion, and the related exhibits, proposed order, and documents exceed 600 pages. Due to the length and complexity of the Amended Disclosure Statement and the Disclosure Statement Motion, Objectors require more than 20 pages to respond meaningfully. The Objection, not including the table of contents and exhibits, is 21 pages long. To the extent Local Bankruptcy Rule 9014-1(e) or Local Rule 7.1(d)(3)(A) applies, Objectors request that they be permitted to file their Objection in excess of the page limitation.

WHEREFORE, Objectors respectfully requests that the Court enter an order substantially in the form attached hereto as Exhibit 1: (a) granting the relief sought herein; and (b) granting such other and further relief to Objectors as the Court deems just and proper.

² Local Bankruptcy Rule 9029-1(a) incorporates “any applicable Local Rules of the United States District Court for the Eastern District of Michigan,” which may be read to incorporate all Local Rules or only those specifically mentioned.

Dated: April 7, 2014

Respectfully Submitted,

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SUMMARY OF ATTACHMENTS

The following documents are attached to this Motion, labeled in accordance with Local Bankruptcy Rule 9014-1(b):

Exhibit 1 – Proposed Form of Order

Exhibit 2 – None [Motion Seeks *Ex Parte* Relief]

Exhibit 3 – None [Brief Not Required]

Exhibit 4 – None [Motion Seeks *Ex Parte* Relief]

Exhibit 5 – None [No Affidavits Filed Specific to This Motion]

Exhibit 6 – None [No Documentary Exhibits Filed Specific to This Motion]

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**ORDER AUTHORIZING OBJECTORS TO FILE
AN OBJECTION IN EXCESS OF PAGE LIMITS**

This matter coming before the Court on the *Ex Parte* Motion of Objectors For Entry of an Order Authorizing Them to File an Objection in Excess of Page Limits (the “Motion”), filed by certain objectors¹ (the “Objectors”), and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

¹ Hypothekbank Frankfurt AG; Hypothekbank Frankfurt International S.A.; Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A.; Deutsche Bank AG, London; Dexia Crédit Local; Dexia Holdings, Inc.; and FMS Wertmanagement AöR.

2. The Objectors are granted relief from the page limit for responses set forth in Local Bankruptcy Rule 9014-1(e) and Local Rule 7.1(d)(3)(A) and may file their Objection to the Motion of the City of Detroit for Approval of the Proposed Disclosure Statement in excess of the page limit.