

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

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

**STATEMENT REGARDING UNRESOLVED OBJECTIONS TO  
PROPOSED DISCLOSURE STATEMENT OF THE CITY OF DETROIT**

1. On February 21, 2014, the City of Detroit, Michigan (the "City"), the debtor in the above-captioned case, filed its Disclosure Statement with Respect to Plan for the Adjustment of Debts of the City of Detroit (Docket No. 2709) (as it may have been or may be amended from time to time, the "Disclosure Statement"). The City filed its first amended Disclosure Statement on March 31, 2014 and will file its second amended Disclosure Statement as soon as practicable.

2. The City received timely and procedurally proper objections to the Disclosure Statement (the "Objections") from 100 parties in interest (each, an "Objector"). Over the course of the past week, the City has engaged in various constructive discussions with many of the Objectors seeking to narrow and resolve the Objections. Specifically, the City: (a) participated in multiple multi-hour

"meet and confer" conference calls with approximately 40 Objectors (including nearly all of the primary creditor constituencies in this chapter 9 case) on April 10 and April 11, 2014;<sup>1</sup> and (b) otherwise informally communicated with various Objectors with respect to proposed additions to and deletions from the Disclosure Statement. In connection with these efforts (and the significant revisions to Disclosure Statement made as a direct result thereof), the City believes that it has made significant progress towards narrowing the range of topics to be presented to the Court at the upcoming hearing to consider approval of the Disclosure Statement (currently scheduled for April 17, 2014) (the "Disclosure Statement Hearing").

---

<sup>1</sup> The City provided notice of these formal "meet and confer" sessions to Objectors by: (a) directly notifying such parties of such sessions; (b) filing the Notice of Meet and Confer Session Regarding Certain Objections to the Amended Disclosure Statement with Respect to Amended Plan for the Adjustment of Debts of the City of Detroit (the "Meet and Confer Notice") (Docket No. 3900); and (c) serving the Meet and Confer Notice upon all Objectors (other than those directly contacted by the City) whose Objections contained legible contact information.

Despite the City's efforts to meet and confer with all Objectors in accordance with the Scheduling Order, a number of individual Objectors did not respond to the Meet and Confer Notice. The City has identified those Objectors who did not participate in the "meet and confer" process on the table summarizing the City's responses to the Objections (the "Objection Response Summary"), attached as Exhibit A to the Consolidated Reply to Objections to Motion of the City of Detroit for Approval of the Proposed Disclosure Statement (Docket No. 4075) (the "Consolidated Reply").

3. However, although the City believes that the substantial amount of information added to the Disclosure Statement addresses many of the hundreds of discrete requests for additional information contained in the Objections, the City has been able to confirm the resolution of only one Objection: the Objection to Amended Disclosure Statement filed on behalf of Ben McKenzie, Jr. (Docket No. 3876). All other Objections identified on the Objection Response Summary remain unresolved. It may be the case that certain of these Objections ultimately may prove resolved by the additions made to the Disclosure Statement, but the City presently is unable to confirm any such resolutions due to the delay in filing the second amended Disclosure Statement made necessary by the City's desire to accommodate the mediation process.

Dated: April 15, 2014

Respectfully submitted,

/s/ Heather Lennox

---

David G. Heiman (OH 0038271)  
Heather Lennox (OH 0059649)  
JONES DAY  
North Point  
901 Lakeside Avenue  
Cleveland, Ohio 44114  
Telephone: (216) 586-3939  
Facsimile: (216) 579-0212  
dgheiman@jonesday.com  
hlennox@jonesday.com

Bruce Bennett (CA 105430)  
JONES DAY  
555 South Flower Street  
Fiftieth Floor  
Los Angeles, California 90071  
Telephone: (213) 243-2382  
Facsimile: (213) 243-2539  
bbennett@jonesday.com

Jonathan S. Green (MI P33140)  
Stephen S. LaPlante (MI P48063)  
MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.  
150 West Jefferson  
Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 963-6420  
Facsimile: (313) 496-7500  
green@millercanfield.com  
laplante@millercanfield.com

ATTORNEYS FOR THE CITY

**CERTIFICATE OF SERVICE**

I, Heather Lennox, hereby certify that the foregoing Statement Regarding Unresolved Objections to Proposed Disclosure Statement of the City of Detroit was filed and served via the Court's electronic case filing and noticing system on this 15th day of April, 2014.

/s/ Heather Lennox \_\_\_\_\_