

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

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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 EMERGENCY MOTION OF DEBTOR
FOR AN ORDER EXTENDING THE DEADLINE FOR
FILING THE FINAL DISCLOSURE STATEMENT SET FORTH
IN THE COURT'S FOURTH AMENDED ORDER ESTABLISHING
PROCEDURES, DEADLINES AND HEARING DATES RELATING
TO THE DEBTOR'S PLAN OF ADJUSTMENT [DOCKET NO. 4202]**

The City of Detroit, Michigan (the "City") hereby moves the Court for entry of an order extending the deadline for the City to file its final disclosure statement resolving the objections sustained by the Court at a hearing held on April 28, 2014, as such deadline is set forth in the Court's Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment (Docket No. 4202) (the "Fourth Amended Scheduling Order").

The Fourth Amended Scheduling Order currently provides that the City must file its final Disclosure Statement with Respect to Plan for the Adjustment of Debts of the City of Detroit (the "Disclosure Statement") by

May 2, 2014 (the "Filing Deadline"). See Fourth Amended Scheduling Order at ¶ 3. The Fourth Amended Scheduling Order also provides that the deadlines established therein may be extended on a motion establishing good cause. See id. at p. 3.

The City respectfully requests a brief extension of the Filing Deadline until 12:00 p.m. (Eastern Time) on May 5, 2014, for the reasons previously discussed with Chambers, at which time the City will file its fourth amended and final Disclosure Statement and fourth amended Plan for the Adjustment of Debts of the City of Detroit.

The City submits that (a) the requested extension is warranted under the circumstances, (b) the relief requested is consonant with the purpose of the Fourth Amended Scheduling Order "to promote the just, speedy, and inexpensive determination of this case" (Fourth Amended Scheduling Order, at p.1) and (c) for the reasons discussed with Chambers, good cause exists for the relief requested herein.

WHEREFORE, the City respectfully requests that the Court: (a) enter an order, substantially in form attached as Exhibit 1 extending the Filing Deadline until 12:00 p.m. (Eastern Time) on May 5, 2014; and (b) grant such other and further relief to the City as the Court may deem proper.

Dated: May 2, 2014

Respectfully submitted,

/s/ Heather Lennox

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ATTORNEYS FOR THE CITY

EXHIBIT 1

(Form of Proposed Order)

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ORDER GRANTING *EX PARTE* EMERGENCY MOTION OF DEBTOR FOR AN ORDER EXTENDING THE DEADLINE FOR FILING THE FINAL DISCLOSURE STATEMENT SET FORTH IN THE COURT'S FOURTH AMENDED ORDER ESTABLISHING PROCEDURES, DEADLINES AND HEARING DATES RELATING TO THE DEBTOR'S PLAN OF ADJUSTMENT [DOCKET NO. 4202]

This matter coming before the Court on the *Ex Parte* Emergency Motion of Debtor for an Order Extending the Deadline for Filing the Final Disclosure Statement Set Forth in the Court's Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtors' Plan of Adjustment [Docket No. 4202] (the "Motion"),¹ filed by the City of Detroit, Michigan (the "City"); the Court having reviewed the Motion; the Court finding that: (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157

¹ Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

and 1334; (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b); and
(c) good cause for the relief requested in the Motion has been established;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The deadline for the City to file its final Disclosure Statement is hereby extended until 12:00 p.m. (Eastern Time) on May 5, 2014.
3. All other provisions of the Court's Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtors' Plan of Adjustment (Docket No. 4202) remain in full force and effect.

CERTIFICATE OF SERVICE

I, Heather Lennox, hereby certify that the foregoing *Ex Parte* Emergency Motion of Debtor for an Order Extending the Deadline for Filing the Final Disclosure Statement Set Forth in the Court's Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtors' Plan of Adjustment [Docket No. 4202] was filed and served via the Court's electronic case filing and noticing system on this 2nd day of May, 2014.

/s/Heather Lennox _____