

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE:

Chapter 9

City of Detroit, Michigan,

Case No. 13-53846

Debtor.

Hon. Steven W. Rhodes

EX PARTE MOTION TO SHORTEN NOTICE AND FOR EXPEDITED HEARING ON THE MOTION OF THE DETROIT PUBLIC SAFETY UNIONS FOR ENTRY OF AN ORDER EXTENDING DEADLINE TO RESPOND TO DISCOVERY REQUESTS AND EXTENDING DEADLINE TO FILE OBJECTIONS TO THE PLAN OF ADJUSTMENT

The Detroit Fire Fighters Association (the “DFFA”), the Detroit Police Officers Association (the “DPOA”), the Detroit Police Lieutenants & Sergeants Association (the “DPLSA”) and the Detroit Police Command Officers Association (the “DPCOA”) (collectively, the “Detroit Public Safety Unions”), through their counsel, Erman, Teicher, Zucker & Freedman, P.C., request that the Court expedite the hearing on their Motion for Entry of an Order Extending the Deadline to Respond to Discovery Requests and Extending the Deadline to File Objections to the Plan of Adjustment (the “Deadline Extension Motion”) [Docket No.4406] pursuant to BR 9006(c)(1), 9007 and LBR 9006-1(b). In support of this motion to expedite, the Public Safety Unions state as follows:

1. The Detroit Public Safety Unions filed the Deadline Extension Motion to request an extension of the deadline to file responses to the City's Plan of Adjustment discovery requests, and an extension of the deadline to object to the Plan of Adjustment.

2. The basis for the underlying relief requested is set forth in the Deadline Extension Motion.

3. An expedited hearing on the Deadline Extension Motion is appropriate because the deadlines for which extension are sought are immediately approaching.

4. This Court is authorized to grant the requested relief pursuant to Bankruptcy Rule 9006(c)(1) and Local Bankruptcy Rule 9006-1(b).

WHEREFORE, the Detroit Public Safety Unions respectfully request that the Court enter an order, substantially in the form attached hereto as Exhibit 1, setting the Deadline Extension Motion for hearing on an expedited basis.

Respectfully submitted,

ERMAN, TEICHER,
ZUCKER & FREEDMAN, P.C.

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DATED: May 5, 2014

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EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE:

Chapter 9

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EX PARTE ORDER GRANTING MOTION TO EXPEDITE

This matter is before the Court on the *ex parte* motion (the “Motion”) of the Detroit Public Safety Unions’ for expedited consideration of their Motion for Entry of an Order Extending the Deadline to Respond to Discovery Requests and Extending the Deadline to File Objections to the Plan of Adjustment (the “Deadline Extension Motion”) [Docket No. _4406]. The Court is fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Motion is Granted.

2. A hearing on the Deadline Extension Motion is scheduled for _____
_____ at _____ .m. (prevailing Eastern Time) before the Hon. Steven Rhodes in
Courtroom 716, Theodore Levin United States Courthouse, 231 W. Lafayette
Blvd., Detroit, Michigan.

3. Any objections to the Deadline Extension Motion must be filed on or
before _____.

EXHIBIT 2

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE:

Chapter 9

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Debtor.

Hon. Steven W. Rhodes

_____ /

CERTIFICATE OF SERVICE

The undersigned certifies that on May 5, 2014, the Ex Parte Motion to Shorten Notice and for Expedited Hearing on the Motion of the Detroit Public Safety Unions for Entry of an Order Extending the Deadline to Respond to Discovery Requests and Extending the Deadline to File Objections to the Plan of Adjustment was electronically filed with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

ERMAN, TEICHER,
ZUCKER & FREEDMAN, P.C.

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DATED: May 5, 2014