

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

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

**OAKLAND COUNTY’S EX PARTE MOTION TO SHORTEN NOTICE
AND FOR EXPEDITED TREATMENT OR HEARING ON:**

**MOTION FOR ENTRY OF AN ORDER EXTENDING DEADLINE TO
FILE OBJECTIONS TO THE CITY OF DETROIT, MICHIGAN’S
PROPOSED FOURTH AMENDED PLAN OF ADJUSTMENT**

Oakland County, Michigan (“Oakland County”), a contingent creditor and party in interest in the above-captioned case, by and through its undersigned counsel, hereby files its *Ex Parte Motion To Shorten Notice And For Expedited Treatment Of Hearing On: Motion For Entry Of An Order Extending Deadline To File Objections The City of Detroit, Michigan’s* (the “City”) *Proposed Fourth Amended Plan Of Adjustment* [Docket No. 4392] (the “Plan”), and in support thereof states as follows:

1. Contemporaneous with the filing of the instant motion (the “Ex Parte Motion”), Oakland County filed its *Motion For Entry Of An Order Extending Deadline To File Objections The City of Detroit, Michigan’s Proposed Fourth Amended Plan Of Adjustment* [Docket No. 4450] (the “Deadline Extension Motion”) pursuant to which Oakland County requested entry of an Order extending its deadline for objecting to the City’s plan of adjustment for one week.

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

3. An expedited hearing or treatment on the Deadline Extension Motion is appropriate because the deadline for which an extension is sought is immediately approaching and will pass prior to the Court’s consideration of the Deadline Extension Motion unless considered by the Court on an expedited basis.

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, Oakland County respectfully requests that this Honorable Court either (1) enter an appropriate Order on the Deadline Extension Motion on an *ex parte* basis, or (2) 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,

Dated: May 6, 2014

CARSON FISCHER, P.L.C.

By: /s/ Joseph M. Fischer

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EX PARTE ORDER GRANTING MOTION FOR EXPEDITED HEARING

This Matter having come before the Court on *Oakland County's Ex Parte Motion To Shorten Notice And For Expedited Treatment Or Hearing On: Oakland County's Motion For Entry Of An Order Extending Deadline To File Objections To The City Of Detroit, Michigan's Proposed Fourth Amended Plan Of Adjustment* [Docket No. ____] (the "Ex Parte Motion"). The Court being duly advised in the premises;

IT IS HEREBY ORDERED that:

1. The x Parte Motion is GRANTED.
2. A hearing on the Deadline Extension Motion is scheduled for _____, 2014 at _____ .m. (prevailing Eastern Time) before the

Exhibit 1 - Proposed Form of Order

Hon. Steven Rhodes in Courtroom 716, Theodore Levin United States Courthouse, 231 W. Lafayette Blvd., Detroit, Michigan, 48009.

3. Any objections to the Deadline Extension Motion must be filed on or before _____, 2014.

CERTIFICATE OF SERVICE

I, Joseph M. Fischer, hereby certify that the foregoing OAKLAND COUNTY'S MOTION FOR ENTRY OF AN ORDER EXTENDING DEADLINE TO FILE OBJECTIONS TO THE CITY OF DETROIT, MICHIGAN'S PROPOSED FOURTH AMENDED PLAN OF ADJUSTMENT was filed and served via the Court's electronic case filing and noticing system on this 6th day of May, 2014.

/s/ Joseph M. Fischer
Joseph M. Fischer (P13452)