

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

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

**EX PARTE MOTION OF THE MACOMB INTERCEPTOR DRAIN
DRAINAGE DISTRICT FOR AN ORDER AUTHORIZING IT
TO FILE A REPLY BRIEF IN EXCESS OF PAGE LIMIT**

The Macomb Interceptor Drain Drainage District (the "MIDDD"), a creditor and party in interest in the above-captioned Chapter 9 bankruptcy case, hereby moves the Court for the entry of an order authorizing MIDDD to file the *Reply to Objections to Motion for Temporary Allowance of Claim of the Macomb Interceptor Drain Drainage District Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Purposes of Accepting or Rejecting the Debtor's Fourth Amended Plan of Adjustment* (the "Reply") in excess of the page limitations of Rule 9014-1(e) of the Local Rules for the United States Bankruptcy Court for the Eastern District of Michigan (the "Local Rules"), to the extent the limitation applies. In support of this motion, the MIDDD states as follows:

1. Although MIDDD has made a concerted effort to keep its reply succinct, MIDDD requires eleven pages to fully respond to the issues raised by two separate objections to its Bankruptcy Rule 3018 Motion: (i) the *Response of the City of Detroit to Motion for Temporary Allowance of the Macomb Interceptor Drain Drainage District Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Purposes of Accepting or Rejecting the Debtor's*

Fourth Amended Plan of Adjustment [Docket No. 5312] and (ii) the *Objection of the Official Committee of Retirees to Motion for Temporary Allowance of Claim of the Macomb Interceptor Drain Drainage District Pursuant to Rule 3018(a)* [Docket No. 5315]. Because MIDDD must respond to numerous legal issues raised by both objectors, MIDDD requires more than 5 pages with which to do so.

2. At eleven pages, the Reply exceeds the page limitations provided in the Local Rules. See Local Rule 9014-1(e) (providing a five-page limitation for reply briefs).

3. To the extent this Local Rule applies to the Reply, MIDDD requests entry of an order expanding the applicable page limitation.

[Remainder of Page Intentionally Left Blank]

WHEREFORE, MIDDD respectfully requests that this Court (i) enter an order substantially in the form attached hereto as Exhibit 1, granting the relief sought herein; and (ii) grant such other and further relief to MIDDD as the Court may deem proper.

Dated: June 20, 2014

Respectfully submitted,

DECHERT LLP

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EXHIBIT 1

Proposed Form of Order

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
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)	
CITY OF DETROIT, MICHIGAN)	Case No. 13-53846
)	
Debtor)	Chapter 9
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EX PARTE ORDER AUTHORIZING THE MACOMB INTERCEPTOR DRAIN DRAINAGE DISTRICT TO FILE A REPLY BRIEF IN EXCESS OF PAGE LIMIT

This matter coming before the Court on the *Ex Parte Motion of the Macomb Interceptor Drain Drainage District to File a Reply Brief in Excess of Page Limit* (the "Motion")¹ and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. MIDDD is authorized to file its *Reply to Objections to Motion for Temporary Allowance of Claim of the Macomb Interceptor Drain Drainage District Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Purposes of Accepting or Rejecting the Debtor's Fourth Amended Plan of Adjustment* in excess of the applicable page limitation.

Dated: _____, 2014
Detroit, Michigan

THE HONORABLE STEVEN RHODES
UNITED STATES BANKRUPTCY JUDGE

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