

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT

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

**EX PARTE MOTION OF INTERNATIONAL UNION, UAW FOR AN ORDER AUTHORIZING IT TO FILE AN OBJECTION TO THE CITY’S FIFTH AMENDED PLAN OF ADJUSTMENT OF THE DEBTS OF THE CITY OF DETROIT IN EXCESS OF PAGE LIMIT**

The International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (“UAW”) a creditor and party in interest in the above-captioned case, through its undersigned counsel hereby moves the court *ex parte* (the “Request”) for the entry of an order authorizing it to file an Objection to the Fifth Amended Plan for the Adjustment of Debts of the City of Detroit (the “Plan Objection”) in excess of the twenty-five (25) page limit set by Eastern District of Michigan Local Rule 7.1(d)(3)(A). In support of the Request, UAW respectfully submits as follows:

1. Rule 7.1(d)(3)(A), which applies to this case pursuant to Bankruptcy Court for the Eastern District of Michigan Local Rule 9029-1(a), states that briefs supporting a response, including footnotes and signatures, may not

exceed twenty-five (25) pages, but that a party seeking to file a longer brief may apply *ex parte* in writing setting forth the reasons.

2. UAW seeks an order expanding the twenty-five (25) page limit imposed by U.S.D.C. Local Rule 7.1(d)(3)(A) for the reasons set forth below.

3. The Plan Objection addresses the City's plan of adjustment, which raises serious issues requiring substantial explanation and analysis of the Plan, and state and federal statutory law implicated by the Plan.

4. The Plan Objection exceeds the limitation set forth in U.S.D.C. Local Rule 7.1(d)(3)(A) and is itself forty-one (41) pages long, thus independently warranting relief from the page limit in order to address the complex issues presented.

WHEREFORE, for the foregoing reasons UAW respectfully requests that this Court enter an order substantially in the form attached hereto as Exhibit 1 and grant such other relief as the Court deems proper.

Dated: New York, New York  
August 1, 2014

Respectfully submitted,

International Union, UAW

By: /s/ Babette A. Ceccotti  
Cohen, Weiss and Simon LLP  
Babette A. Ceccotti  
330 West 42nd Street  
New York, New York 10036-6976  
T: (212) 563-4100  
F: (212) 695-5436  
bceccotti@cwsny.com

Niraj R. Ganatra (P63150)  
Michael Nicholson (P33421)  
8000 East Jefferson Avenue  
Detroit, Michigan 48214  
T: (313) 926-5216  
F: (313) 926-5240  
nganatra@uaw.net  
mnicholson@uaw.net

*Attorneys for International Union, UAW*

**Exhibit 1**

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT

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

**EX PARTE ORDER AUTHORIZING UAW TO FILE A  
PLAN OBJECTION IN EXCESS OF PAGE LIMIT**

This matter coming before the Court on the *Ex Parte* Motion of International Union, UAW (“UAW”) for an Order Authorizing It to File a Plan Objection in Excess of Page Limit (the “Motion”); and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. UAW is granted relief from Eastern District of Michigan Local Rule 7.1(d)(3)(A) to file a response in excess of twenty-five (25) pages.

Signed on \_\_\_\_\_

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT

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

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 1st day of August 2014, I caused the  
*Ex Parte Motion of International Union, UAW for an Order Authorizing It to File  
a Plan Objection in Excess of Page Limit* to be filed with the Clerk of the Court  
using the CM/ECF system, which will send notification of such filing to all  
counsel of record.

Dated:   New York, New York  
          August 1, 2014

Cohen, Weiss and Simon LLP

By: /s/ Babette A. Ceccotti  
330 West 42nd Street  
New York, New York 10036-6976  
T: (212) 563-4100  
bceccotti@cwsny.com

*Attorneys for International Union, UAW*