

**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
	)	

---

**STIPULATION TO ENTRY OF PROTECTIVE ORDER**

The Police and Fire Retirement System of the City of Detroit (“PFRS”), the General Retirement System of the City of Detroit (“GRS,” and, together with PFRS, the “Retirement Systems”) and the Official Committee of Retirees of the City of Detroit (the “Committee”) stipulate to entry of the Protective Order attached as Exhibit 1 hereto.

Stipulated and agreed to by:

DENTONS US LLP

/s/ Sam Alberts

Sam Alberts  
Dan Barnowski  
1301 K Street NW  
Suite 600, East Tower  
Washington, DC 20005  
Telephone: (202) 408-6400  
Facsimile: (202) 408-6399  
sam.alberts@dentons.com  
dan.barnowski@dentons.com

Claude Montgomery  
Carole Neville  
1221 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 768-6700  
Facsimile (212) 768-6800  
claudemontgomery@dentons.com  
carole.neville@dentons.com

BROOKS WILKINS SHARKEY &  
TURCO PLLC

Matthew E. Wilkins  
Paula A. Hall  
401 South Old Woodward, Suite 400  
Birmingham, Michigan 48009  
Telephone: (248) 971-1711  
Facsimile: (248) 971-1801  
wilkins@bwst-law.com  
hall@bwst-law.com

*Counsel for the Official Committee of  
Retirees of the City of Detroit, Michigan*

CLARK HILL PLC

/s/ Shannon L. Deeby

Robert D. Gordon (P48627)  
Shannon L. Deeby (P60242)  
Jennifer K. Green (P69019)  
Sean P. Gallagher (P73108)  
151 South Old Woodward Ave.  
Suite 200  
Birmingham, MI 48009  
Telephone: (248) 988-5882  
Facsimile: (248) 988-2502  
rgordon@clarkhill.com  
sdeeby@clarkhill.com

*Counsel to the Police and Fire  
Retirement System of the City of  
Detroit and the General  
Retirement System of the City of  
Detroit*

# EXHIBIT 1

**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
	)	

---

**STIPULATED PROTECTIVE ORDER**

This matter having come before the Court upon the Stipulation of the Police and Fire Retirement System of the City of Detroit (“PFRS”), the General Retirement System of the City of Detroit (“GRS,” and together with PFRS, the “Retirement Systems”), and the Official Committee of Retirees of the City of Detroit (the “Committee”) that certain data being produced by the Retirements Systems to the Committee (the “Data”) may contain personally identifiable information relating to individual retirees or active employees of the City of Detroit, including but not limited to, social security numbers, dates of birth, pension identification numbers, home addresses, home telephone numbers, and financial account numbers; the Retirement Systems desiring to protect personally identifiable information from disclosure; and the Court finding good cause for granting the relief herein:

**IT IS HEREBY ORDERED:**

1. The Committee shall keep confidential all personally identifiable information of third parties contained in the Data that it receives from the Retirement Systems. Personally identifiable information shall include names, physical and electronic addresses, telephone numbers, social security numbers, dates of birth, pension identification numbers, financial account numbers, and any other information whose disclosure would create an undue risk of identity theft or other unlawful injury.

2. The Committee may disclose or refer to the Data on the condition that the disclosed Data not identify a specific retiree or a specific retiree's personally identifiable information.

3. The Committee shall provide its attorneys, financial advisors, actuaries, expert witnesses, or any other agent(s) with a copy of this Stipulated Order (the "Order") and obtain each such person or entity's agreement to be bound by the Order in advance of such person or entity receiving any of the Data.

4. Nothing in this Order shall be deemed to waive any objections to the production of documents that the Retirement Systems may be entitled to assert under state and federal law, including M.C.L. § 38.1140h.

5. Nothing in this Order shall be deemed to waive any privileges that the Retirement Systems may be entitled to assert, including the attorney-client, work product, and/or accountant-client privileges.

6. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 18, 2014, the Stipulation to Entry of Protective Order was filed and served using the Court's CM/ECF system which provides electronic notification of such filings to all counsel of record.

Dated: August 18, 2014

DENTONS US LLP

By: /s/ Sam Alberts

Sam Alberts