

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

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

**CORRECTED COALITION OF DETROIT UNIONS MOTION FOR
ABSTENTION AND TO REMAND THE CLAIMS CONTAINED
IN PROOF OF CLAIM #2851**

NOW COMES the Coalition of Detroit Unions (Coalition or Claimant) for its Motion for Abstention and to Remand the Claims Contained in Proof of Claim #2851 and states as follows:

For its motion, the Coalition incorporates herein by reference the arguments from the AFSCME motion for abstention [Docket No 8492], filed November 26, 2014 and subsequently filed corrected motion, and the claim description for claim number #8.

WHEREFORE, the Coalition of Detroit Unions respectfully request this Court grant its motion to abstain from hearing these matters.

Dated: December 2, 2014

/s/ Richard G. Mack, Jr.
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EXHIBIT 1

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

In re)
) Chapter 9
)
CITY OF DETROIT, MICHIGAN,) Case No. 13-53846
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) Hon. Steven W. Rhodes
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**PROPOSED ORDER GRANTING COALITION OF DETROIT UNIONS
CORRECTED MOTION FOR ABSTENTION AND TO REMAND THE
CLAIMS CONTAINED IN PROOF OF CLAIM #2851**

This matter having come before the Court on the Motion of the Coalition of Detroit Unions ("Coalition") requesting this Court to abstain from hearing and remand the remaining claims contained within Proof of Claim #2851, filed by the Coalition; and the Court being fully advised in the premises;

It is hereby ORDERED that:

1. This Court abstains from adjudicating the remaining claims contained within Proof of Claim #2851, as identified in the Coalition's motion;
2. This Court remands the individual claims contained within Proof of Claim #2851 to be adjudicated before the Michigan Employment Relations Commission, as identified in the Proof of Claim #2851, to determine liquidated value.

STEPHEN RHODES
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 2

**UNITED STATES BANKRUPTCY COURT
Eastern District of Michigan**

In re:

City of Detroit, Michigan
2 Woodward Avenue
Suite 1126
Detroit, MI 48226

Chapter: 9

Case No. 13-53846

Debtor(s)

Hon. Steven W. Rhodes

Address: City of Detroit, Michigan
2 Woodward Avenue
Suite 1126
Detroit, MI 48226

Employer's Tax Identification (EIN): 38-6004606

NOTICE OF MOTION AND OPPORTUNITY TO OBJECT

Coalition of Detroit Unions has filed papers with the court to request the court permissively abstain and to remand the claims contained in Proof of Claim #2851

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to permissively abstain and to remand the claims contained in Proof of Claim #2851, or if you want the court to consider your views on the motion, within 14 days, you or your attorney must:

1. File with the court a written response or an answer, explaining your position at:¹

United States Bankruptcy Court
211 West Fort Street
Detroit, MI 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

You must also mail a copy to:

Richard G. Mack, Jr., Esq.
MILLER COHEN PLC
600 West Lafayette Blvd., 4th Floor
Detroit, MI 48226-3191
Telephone: (313) 964-4454
Facsimile: (313) 964-4490
richardmack@millercohen.com

¹ Response or answer must comply with F. R. Civ. P. 8(b), (c) and (e)

2. If a response or answer is timely filed and served, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: December 2, 2014

/s/ Richard G. Mack, Jr.
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CERTIFICATE OF SERVICE

The undersigned certifies that on December 2, 2014, the *Corrected Coalition of Detroit Unions' Motion for Abstention and to Remand the Claims Contained In Proof of Claim #2851*, with the Clerk of the Court for the United States District 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.

/s/ Richard G. Mack, Jr.
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