

**Form 416B CAPTION (Short Title)**

*(May be used if 11 U.S.C. § 342(c) is not applicable)*

**United States Bankruptcy Court**

Eastern District Of Michigan

In re City of Detroit, Michigan,

Debtor

Case No. 13-53846

Chapter 9

NOTICE OF APPEAL AND STATEMENT OF ELECTION



[Caption as in Form 416A, 416B, or 416D, as appropriate]

### NOTICE OF APPEAL AND STATEMENT OF ELECTION

#### **Part 1: Identify the appellant(s)**

- Name(s) of appellant(s): Darell Chancellor
- Position of appellant(s) in the adversary proceeding or bankruptcy case that is the subject of this appeal:
 

For appeals in an adversary proceeding. <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant <input type="checkbox"/> Other (describe) _____	For appeals in a bankruptcy case and not in an adversary proceeding. <input type="checkbox"/> Debtor <input type="checkbox"/> Creditor <input type="checkbox"/> Trustee <input checked="" type="checkbox"/> Other (describe) <u>Interested Party</u>
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#### **Part 2: Identify the subject of this appeal**

Order Granting City of Detroit's Motion for Entry of an Order Enforcing the Bar Date (Doc. # 13751)

- Describe the judgment, order, or decree appealed from: \_\_\_\_\_
- State the date on which the judgment, order, or decree was entered: October 4, 2023

#### **Part 3: Identify the other parties to the appeal**

List the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys (attach additional pages if necessary):

- Party: City of Detroit, Michigan Attorney: Patrick M. Cunningham (P67643)  
& Stephen Geelhood City of Detroit Law Department  
Two Woodward Ave., Ste. 500  
Detroit, MI 48226  
(313) 237-5032
- Party: Darell Chancellor Attorney: Christopher P. Desmond (P71493)  
Ven R. Johnson (P39219)  
Johnson Law, PLC  
535 Griswold St., Ste. 2600  
Detroit, MI 48226  
(313) 324-8300

**Part 4: Optional election to have appeal heard by District Court (applicable only in certain districts)**

If a Bankruptcy Appellate Panel is available in this judicial district, the Bankruptcy Appellate Panel will hear this appeal unless, pursuant to 28 U.S.C. § 158(c)(1), a party elects to have the appeal heard by the United States District Court. If an appellant filing this notice wishes to have the appeal heard by the United States District Court, check below. Do not check the box if the appellant wishes the Bankruptcy Appellate Panel to hear the appeal.

Appellant(s) elect to have the appeal heard by the United States District Court rather than by the Bankruptcy Appellate Panel.

**Part 5: Sign below**

*/s/ Paul F. Doherty (P36579)*

Date: October 18, 2023

Signature of attorney for appellant(s) (or appellant(s) if not represented by an attorney)

Name, address, and telephone number of attorney (or appellant(s) if not represented by an attorney):

Paul F. Doherty (P36579)  
Johnson Law, PLC  
535 Griswold Street, Suite 2600  
Detroit, Michigan 48226  
(313) 324-8300

Fee waiver notice: If appellant is a child support creditor or its representative and appellant has filed the form specified in § 304(g) of the Bankruptcy Reform Act of 1994, no fee is required.

**[Note to inmate filers:** If you are an inmate filer in an institution and you seek the timing benefit of Fed. R. Bankr. P. 8002(c)(1), complete Director’s Form 4170 (Declaration of Inmate Filing) and file that declaration along with the Notice of Appeal.]

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

In re:

City of Detroit, Michigan,  
Debtor.

Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**ORDER GRANTING CITY OF DETROIT'S MOTION FOR THE  
ENTRY OF AN ORDER ENFORCING THE BAR DATE ORDER AND  
CONFIRMATION ORDER AGAINST DARELL CHANCELLOR**

This case is before the Court on the motion entitled "City of Detroit's Motion for the Entry of an Order Enforcing the Bar Date Order and Confirmation Order Against Darell Chancellor" (Docket # 13691, the "Motion").<sup>1</sup> The Court held a telephonic hearing on the Motion on October 4, 2023. For the reasons stated by the Court on the record during the hearing, the Court enters this Order.

**IT IS ORDERED THAT:**

1. The Motion is granted.
2. No later than October 12, 2023, Darell Chancellor must dismiss, or cause to be dismissed, the City of Detroit and Officer Stephen Geelhood in his representative capacity with prejudice from the cases captioned as: (a) *Darell Deon Chancellor, Chancellor, v Officer Stephen Geelhood in his Individual and Representative Capacity, and the City of Detroit, a municipal entity, Defendants,*

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<sup>1</sup> Capitalized terms used but not otherwise defined in this Order have the meanings given to them in the Motion.

filed in the United States District Court for the Eastern District of Michigan and assigned Case No. 20-cv-11616 (the “Federal Lawsuit”); and (b) *Darell Chancellor, Chancellor, v Officer Stephen Geelhood in his Individual and Representative Capacity, and the City of Detroit, a municipal entity, Defendants*, as removed to the United States District Court for the Eastern District of Michigan and assigned Case No. 20-cv-11992 (the “Removed Lawsuit”, and together with the Federal Lawsuit, the “Lawsuits”).

3. Darell Chancellor is permanently barred, estopped and enjoined from asserting claims asserted in the Lawsuits or claims arising from or related to the Lawsuits against Officer Geelhood in his representative capacity, the City of Detroit, or property of the City of Detroit.

4. Darell Chancellor is prohibited from sharing in any distribution in this bankruptcy case.

5. This Order does not apply to the assertion or prosecution by Darell Chancellor of any claims against Officer Geelhood solely in his individual capacity.

6. The Court will retain jurisdiction over any and all matters arising from the interpretation or implementation of this Order.

Signed on October 4, 2023



**/s/ Thomas J. Tucker**

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**Thomas J. Tucker**  
**United States Bankruptcy Judge**

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*(May be used if 11 U.S.C. § 342(c) is not applicable)*

**United States Bankruptcy Court**

Eastern District Of Michigan  
Southern Division

In re City of Detroit, Michigan  
Debtor

Case No. 13-53846

Chapter 9

CERTIFICATION OF SERVICE

## CERTIFICATION OF SERVICE

I certify that on October 18, 2023, I electronically filed Notice of Appeal and Statement of Election with the Clerk of the Court using the CM/ECF system which will send notifications of this filing to all registered parties including:

PATRICK M. CUNNINGHAM (P67643)  
**CITY OF DETROIT LAW DEPARTMENT**  
*Counsel for Defendants City of Detroit and Stephen Geelhood*  
Two Woodward Ave, Suite 500  
Detroit, Michigan 48226  
(313) 237.5032  
cunninghamp@detroitmi.gov

By: /s/ Paul F. Doherty  
Paul F. Doherty (P36579)  
Christopher P. Desmond (P71493)  
Attorneys for Darell Chancellor  
Buhl Building  
535 Griswold Street, Suite 2600  
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(313) 324-8300  
[pdoherty@venjohnsonlaw.com](mailto:pdoherty@venjohnsonlaw.com)

Date: October 18, 2023