

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

In re:  
City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846  
Judge Thomas J. Tucker  
Chapter 9

**CERTIFICATION OF NO RESPONSE OR OBJECTION  
REGARDING CITY OF DETROIT’S JULY 2024 MOTION FOR  
AUTHORITY TO MODIFY THE CONFIRMED PLAN OF ADJUSTMENT  
TO REVISE THE “DROP” PROGRAM  
FOR CERTAIN POLICE OFFICERS**

On July 19, 2024, the City of Detroit (“City”) filed the *City of Detroit’s July 2024 Motion for Authority to Modify the Confirmed Plan of Adjustment to Revise the “DROP” Program for Certain Police Officers* (“Motion”) [Doc. No. 13908].

On the same date, the Motion was served upon all parties identified on the Certificates of Service attached as **Exhibit 1**. *See Certificates of Service*, Exhibit 1.

No response to the Motion has been filed with the Court and the time to do so has passed. The City respectfully requests that the Court enter an order granting the Motion in substantially the same form as the one which was attached to the Motion. *See Proposed Order*, **Exhibit 2**.



Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C

By: /s/ Marc N. Swanson

Marc N. Swanson (P71149).

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Facsimile: (313) 496-8451

swansonm@millercanfield.com

Attorneys for the City of Detroit

DATED: August 9, 2024

**Exhibit 1**

**EXHIBIT 4 – CERTIFICATE OF SERVICE**

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

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 19, 2024, he electronically filed the *City of Detroit’s July 2024 Motion for Authority to Modify the Confirmed Plan of Adjustment to Revise the “DROP” Program for Certain Police Officers* (the “Motion”) with the Clerk of the Court which sends notice by operation of the Court’s electronic filing service to all ECF participants registered to receive notice in this case. The City has engaged a Noticing Agent, which will serve the Motion on all parties identified on the Special Service List; the General Service List maintained by the Noticing Agent; and the presidents of the Detroit Police Command Officers Association, the Detroit Police and Lieutenant and Sergeants Association, and the Detroit Police Officers Association, and will file a subsequent Proof of Service after it has performed the service.

DATED: July 19, 2024

By: /s/ Marc N. Swanson

Marc N. Swanson

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Detroit, Michigan 48226

Telephone: (313) 496-7591

Facsimile: (313) 496-8451

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

In re:

Chapter 9

City of Detroit, Michigan,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

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**CERTIFICATE OF SERVICE**

I, Andres A. Estrada, certify and say that I am employed by Kurtzman Carson Consultants LLC dba Verita Global (“Verita”), the claims and noticing agent for the Debtor in the above-captioned case.

On July 19, 2024, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail on the service list attached hereto as **Exhibit A**; and via First Class Mail on the service list attached hereto as **Exhibit B**:

- **City of Detroit's July 2024 Motion for Authority to Modify the Confirmed Plan of Adjustment to Revise the "DROP" Program for Certain Police Officers** [Docket No. 13908]

Dated: July 24, 2024

/s/ Andres A. Estrada  
Andres A. Estrada  
KCC  
222 N. Pacific Coast Highway, Suite 300  
El Segundo, CA 90245



# Exhibit A

**Exhibit A  
GSL/SSL 2002 List  
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Union Representative	AFSCME Local #0062	Attn: Lacydia Moore-Reese	Reesel@detroitmi.gov
Union Representative	AFSCME Local #0207	Attn: James Williams	afscme207@sbcglobal.net
Union Representative	AFSCME Local #0214	Attn: June Nickleberry	missnick64@hotmail.com
Union Representative	AFSCME Local #0273	Attn: Sceecilla Hunt	anurses@att.net
Union Representative	AFSCME Local #0542	Attn: Phyllis McMillon	philphi48238@yahoo.com
Union Representative	AFSCME Local #0836	Attn: Robert Donald	union836@yahoo.com
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Union Representative	Association of Detroit Engineers	Attn: Sanjay M. Patel	patel@dwsd.org
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Counsel for Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A., Hypothekbank Frankfurt AG, Hypothekbank Frankfurt International S.A., and Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A. (collectively "EEPK").	Ballard Spahr LLP	Matthew G Summers	summersm@ballardspahr.com
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**Exhibit A  
GSL/SSL 2002 List  
Served via Email**

Description	CreditorName	CreditorNoticeName	Email
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Counsel for Defendat MGM Grand Detroit, LLC	Dickinson Wright PLLC	Peter H Ellsworth	pellsworth@dickinsonwright.com
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**Exhibit A  
GSL/SSL 2002 List  
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Counsel to Certain Significant Holders of the COPs	Kramer Levin Naftalis & Frankel LLP	Thomas Moers Mayer	tmayer@kramerlevin.com
Detroit Police Lieutenants and Sergeants Association; and Detroit Police Officers Association; Detroit Fire Fighters Association, I.A.F.F. Local 344; Sanitary Chemists and Technicians Association; Association of Detroit Engineers; John Runyan; Electrical Workers' Pension Trust Fund of Local Union #58, I.B.E.W., Detroit, Michigan (the "IBEW #58 Pension Fund") and the Sheet Metal Workers' Local Union No. 80 Pension Trust Fund (the "SMW 80 Pension Fund") (together, the "Pension Funds")	Law Office of Barbara A. Patek, PLC	Barbara A Patek	pateklaw@gmail.com
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**Exhibit A  
GSL/SSL 2002 List  
Served via Email**

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Counsel to Michael J. Karwoski	Michael J. Karwoski, Esq.		mjkarwoski@alumni.nd.edu
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Counsel for Community Foundation for Southeast Michigan; William Davidson Foundation; The Fred A. and Barbara M. Erb Family Foundation; Max M. and Marjorie S. Fisher Foundation; The Ford Foundation; Hudson-Webber Foundation; W.K. Kellogg Foundation; McGregor Fund; Charles Stewart Mott Foundation; and A. Paul and Carol C. Schaap Foundation (Collectively, the "Foundations")	Plunkett Cooney	Douglas C Bernstein	dbernstein@plunkettcooney.com
Top 20 Creditor - City's Pension Trusts	Police and Fire Retirement System of the City of Detroit	Attn: Joseph E. Turner, Esq.	jturner@clarkhill.com
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Attorneys for Creditors: Carlton Carter, Bobby Jones, Roderick Holley and Richard T. Weatherly	Resnick & Moss PC	H Nathan Resnick	hnresnick@resnicklaw.net;hnresnick@resnicklaw.com
Retiree Representative	Retired Detroit Police and Fire Fighters Association	Attn: Donald Taylor	rdpfa@hotmail.com

**Exhibit A  
GSL/SSL 2002 List  
Served via Email**

Description	CreditorName	CreditorNoticeName	Email
Counsel to Eric Kimbrough, Leinathian Jelks, Brandon Brooks, Phyllis Tharpe, Rodney Heard, Clenette Harris, Gregory Brazell, Jennifer Harris-Barnes, Henry Hassan, Melvin Miller, Terry Hardison, Velma, Denson, Raymond Thompson, Lucy Flowers, Brandon Gilbert, Brady Johnson, Quentin King, Sharon Pettway, Taralyn Smith, Donna Weatherspoon, Tarita Wilburn, Joseph Wright, Laverne Covington, James Matson, Kevin McGillivray, Rhonda Craig, Orlando Marion, John Collins, Terry Hardison, Carolyn Harp, Jeffrey Peterson, Clementine Stephens, Ezekiel Davis, Michael McKay, David Both, Raymond Thompson, Jr., Doug Taylor, Shumithia Baker, Floyd Brunson, Jerry Ashley, Anthony Harmon, Shelton Bell, Jr., Jeremiah Duren, Otis Evans, Wendy Jefferson, Gary Musser, Mario Littlejohn, Angela Davis, Jeffrey Theriot, Bernard White, Eddie Moore, Robert MCGowen, Curtis Morris, Hondra Porter, Kevin Mcdonald, Jay Woods, Taesean Parnell, YvetteSpencer, Viena Lowe, Landon Banks, Darchella Lattner, Micholas Martin, Marily Cloyd, Robert Hall, Victoria Wilson, Theresa Chalch, Angela Davis, Jamie Jackson, Donald Harris, Winter Owens, Samiya Speed, Teran Brown, Antonio Brooks, Jermaine Gleen, Ray Lizzamore, Daniel Latanzio, Woodrow Roberson, Kevin Ivie, Darnell Fields, Daniel Soto, Kevin McGillivray, and Bradley Schick,	Romano Law PLLC	Attn Daniel G Romano & Trevor J. Zamborsky	dromano@romanolawpllc.com
Counsel for Official Retiree Committee Contract Counterparty	Salans FMC SNR Dentons Europe LLP SBS Financial Products Company, LLC	Claude Montgomery Attn. John Carter	claudemontgomery@Dentons.com jcarter@sbsco.com
Counsel for FMS Wertmanagement AöR	Schiff Hardin LLP	Frederick J. Sperling & Paul E. Greenwalt	fsperling@schiffhardin.com; pgreenwalt@schiffhardin.com
Counsel for DEPFA Bank PLC	Schiff Hardin LLP	Suzanne L Wahl	swahl@schiffhardin.com
Counsel for Schneiderman and Sherman PC; Attorney for U.S. Bank National Association as servicer for Michigan State Housing Development Authority; Flagstar Bank, FSB; Counsel for Kondaur Capital Corporation	Schneiderman & Sherman PC	Neil Sherman	NSherman@sspcclegal.com
Union Representative	SEIU Local 517M	Attn: Yolanda Langston	langstony@gmail.com
Union Representative	Senior Water Systems Chemist Association	Attn: Andrew Ross	aross@dwsd.org
Counsel for The Kales Grand Circus Park LLC	Seyburn Kahn	David T Lin	dlin@seyburn.com
Fee Examiner	Shaw Fishman Glantz & Towbin LLC	Ira Bodenstein Gordon Gouveia David Doyle and Marc Reiser	ggouveia@shawfishman.com;
Counsel to Respondents Christopher McGhee, Norman Brown, Craig Brown, James Washington, Shannon Ferguson, Junius Perry and Orlando Potts	Shawndrica N. Simmons		SimmonsLegal@LawChic.com
Counsel for Detroit Winsor Tunnell LLC	Sheldon S Toll PLLC	Sheldon S Toll	lawtoll@comcast.net
Counsel for National Public Finance Guarantee Corporation	Sidley Austin LLP	Attn: Jeffrey Bjork, Esq. & Eric D. Tashman, Esq.	etashman@sidley.com;;
Counsel for Unisys Corporation	Sirlin Lesser & Benson PC	Dana S Plon	dplon@sirlinlaw.com
Counsel for Airgas USA LLC	Smith Katzenstein & Jenkins LLP	Kathleen M Miller	kmiller@skjlaw.com
State of Michigan Chief Legal Counsel	State of Michigan Chief Legal Counsel	Matthew Schneider	Schneiderm7@michigan.gov
State of Michigan Assistant Attorney General, Counsel to State of Michigan	State of Michigan Revenue & Collections Division	Steven B Flancher & Matther Schneider	flanchers@michigan.gov; schneiderm7@michigan.gov
The Office of the Treasurer for the State of Michigan	State Treasurer		MIStateTreasurer@michigan.gov
Counsel for Nuveen Asset Management and BlackRock Financial Management, Inc.; and Greenhill & Co LLC	Steinberg Shapiro & Clark	Mark H Shapiro	shapiro@steinbergshapiro.com
Counsel for Gabriel, Roeder, Smith & Company; Clark Associates, Inc.	Stevenson & Bullock PLC	Charles D Bullock Elliot G Crowder & Sean M Walsh	cbullock@sbplclaw.com; ecrowder@sbplclaw.com
Counsel for the Detroit Police Lieutenants and Sergeants Association	Sudnick Law PC	Peter P Sudnick	psudnick@sudnicklaw.com
Counsel for Syncora Guarantee Inc	Susheel Kirpalani Quinn Emanuel Urquhart & Sullivan, LLP		susheelkirpalani@quinnemanuel.com
Sylvia Jean Brown Jones, Pro Se	Sylvia Jean Brown Jones		bjdelta55@gmail.com
City's Secured & Unsecured Bonds	The Bank of New York Mellon Trust Company, National Association, as trustee	Attn: Eduardo Rodriguez	eduardo.rodriguez@bnymellon.com
Counsel for Derrez Payne	The Law Offices of Joumana Kayrouz, PLLC		mbenkstein@joumanakayrouz.com
Counsel for Kevin Lewis & Jeremy Morris	The Markowitz Law Office	Carolyn B Markowitz PC	bankruptcy@markowitzlegal.com
Counsel for Michigan Auto Recovery Service Inc; Wayne County Circuit Court, Hyde Park Cooperative, et al. v. City of Detroit, by and through its Buildings and Safety Engineering Department, Case No. 10-005687-CZ	Thornbladh Legal Group PLLC	Kurt Thornbladh	kthornbladh@gmail.com; thornbladh.kurt3@gmail.com
Counsel for City of Detroit, Michigan	Togut Segal & Segal LLP	Attention: Albert Togut, Scott E. Ratner & Neil Berger	seratner@teamtogut.com; neilberger@teamtogut.com; dperson@teamtogut.com;
Top 20 Creditor - City's Secured & Unsecured Bonds (Including Sewer and Water)	U.S. Bank National Association, as trustee, bond registrar transfer agent, paying agent, custodian and/or contract administrator	Attn: Susan E. Jacobsen VP	susan.jacobsen2@usbank.com
Union Representative	UAW - Local # 412	Attn: John Cunningham	jcunningham@uaw.net
Union Representative	UAW - Local #212	Attn: John Cunningham	jcunningham@uaw.net
Union Representative	UAW - PAA Local #2211	Attn: Robyn Brooks	BrooR@detroitmi.gov
Union Representative	UAW - WWTP Local #2200	Attn: Laurie Stuart	mimilaurie@yahoo.com;
Union Representative	Utility Workers Union of America	Attn: James Harrison	jharrison@uwua.net

**Exhibit A  
GSL/SSL 2002 List  
Served via Email**

<b>Description</b>	<b>CreditorName</b>	<b>CreditorNoticeName</b>	<b>Email</b>
Counsel for Center for Community Justice and Advocacy ("CCJA")	Vanessa G. Fluker, Esq., PLLC	Vanessa G Fluker	vgflawyer@sbcglobal.net
Counsel for UBS AG and Merrill Lynch Capital Services Inc (COP Swap Counterparties)	Warner Norcross & Judd LLP	Douglas A Dozeman & Charles N Ash Jr	ddozeman@wnj.com;;cash@wnj.com
Counsel to Interested Party Richard Snyder	Warner Norcross + Judd LLP	Charles N Ash Jr	cash@wnj.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Alfredo R Perez	alfredo.perez@weil.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Attn: Gary T. Holtzer, Esq. & Alfredo R. Pérez, Esq.	gary.holtzer@weil.com;;alfredo.perez@weil.com
Counsel for Financial Guaranty Insurance Company	Weil, Gotshal & Manges LLP	Kelly DiBlasi	kelly.diblasi@weil.com
Counsel for Financial Guaranty Insurance Company	Williams Williams Rattner & Plunkett PC	Ernest J Essad Jr	ejessad@wwrplaw.com
Counsel for Assured Guaranty Municipal Corporation	Winston & Strawn LLP	Attn: Lawrence A. Larose Samuel S. Kohn Carrie V. Hardman	chardman@winston.com
Counsel for The Bank of New York Mellon	Wolfson Bolton PLLC	Scott A Wolfson & Anthony J Kochis	swolfson@wolfsonbolton.com; akochis@wolfsonbolton.com
Counsel for International Association of Fire Fighters, AFL-CIO, CL	Woodley & McGillivray	Douglas L Steele	dls@wmlaborlaw.com

# Exhibit B

Exhibit B  
GSL/SSL 2002 List  
Served via First Class Mail

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country
Union Representative	AFSCME Council #25	Attn: Albert Garrett	1034 N. Washington Ave			Lansing	MI	48906	
Union Representative	AFSCME Council #25	Attn: Albert Garrett	600 W. Lafayette, Ste. 500			Lansing	MI	48906	
Union Representative	AFSCME Council #25	Attn: Catherine Phillips	600 W. Lafayette, Ste. 500			Detroit	MI	48226	
Union Representative	AFSCME Council #25	Attn: Ed McNeil	7700 Second Ave, Suite 314			Detroit	MI	48202	
Union Representative	AFSCME Local #0023	Attn: Robert Stokes	600 W. Lafayette, Ste. 134			Detroit	MI	48226	
Union Representative	AFSCME Local #0229	Attn: Zachary Carr	600 W. Lafayette, Ste. LR-08			Detroit	MI	48226	
Union Representative	AFSCME Local #0312	Attn: Phillip Douglas	14022 Linwood			Detroit	MI	48238	
Union Representative	AFSCME Local #0457	Attn: Laurie Walker	600 W. Lafayette, Ste. L - 104			Detroit	MI	48226	
Union Representative	AFSCME Local #1206	Attn: Arlene Kirby	20400 Steel			Detroit	MI	48235	
Union Representative	AFSCME Local #1220	Attn: Gerald Thompson	600 W. Lafayette, Ste. 136			Detroit	MI	48226	
Union Representative	AFSCME Local #1227	Attn: Joseph Walter	P.O. Box 36314			Grosse Pointe Farms	MI	48236	
Union Representative	AFSCME Local #1642	Attn: Gina Thompson-Mitchell	20460 Ilene St			Detroit	MI	48221-1018	
Union Representative	Airgas USA LLC	Attn: David Boyle	259 Radnor-Chester Rd Ste 100	PO Box 6675		Radnor	PA	19087-8675	
Union Representative	Amalgamated Transit Union, Division 26	Attn: Henry Gaffney	716 Lothrop			Detroit	MI	48202	
Union Representative	Assistant Supervisors of Street Maintenance & Construction Association	Attn: Herbert Jenkins	2633 Michigan Avenue			Detroit	MI	48216	
Union Representative	Association of Professional Construction Inspectors	Attn: Juanita Sanders	2727 Second Ave., Ste. 314B			Detroit	MI	48201	
Counsel for Detroit Branch NAACP, Michigan State Conference NAACP, Donnell White, individually and on behalf of Detroit Branch NAACP and Michigan State Conference NAACP, Thomas Stallworth III, individually, Patricia Tiab, individually, and Maureen Taylor, individually, interested parties in this bankruptcy matter as it pertains to their civil suit in the Federal Eastern District Court of Michigan (Case Number 13-CV-12098)	Ayad Law PLLC	Nabih H Ayad	2200 Canton Ctr Rd Ste 220			Canton	MI	48187	
Counsel for Genuine Parts Company	Barack Ferrazzano Kirschbaum & Nagelberg LLP	Kimberly J Robinson	200 W Madison St Ste 3900			Chicago	IL	60606	
Counsel for Siemens Industry Inc.	Bowman and Brooke LLP		41000 Woodward Avenue, Suite 200 East			Bloomfield Hills	MI	48304	
Attorneys for Defendants Detroit General Retirement System Service Corporation and Detroit Police and Fire Retirement System Corporation	Butzel Long, PC	Brian E McGinty	150 W Jefferson Ste 100			Detroit	MI	48226	
Counsel for the Police and Fire Retirement System of the City of Detroit (the "PFRS") and the General Retirement System of the City of Detroit (the "GRS")	Clark Hill PLC	Shannon L Deeby	151 S Old Woodward Ave Ste 200			Birmingham	MI	48009	
Counsel for HP Enterprise Services LLC	Cole Scholtz Meisel Forman & Leonard PA	Michael D Warner	301 Commerce St Ste 1700			Fort Worth	TX	76102	
Counsel for Kaly Development	David W Yaldo PC	David W. Yaldo	4036 Telegraph Road, Suite 204			Bloomfield Hills	MI	48302	
Counsel for T-Mobile USA, Inc	Dawda, Mann, Mulcahy & Sadler, PLC	Attn: Jessica B Allmand	39533 Woodward Ave Ste 200			Bloomfield Hills	MI	48304-5103	
Union Representative	Detroit Police Command Officers Association	Attn: Stacy Alvarado	P.O. Box 2625			Detroit	MI	48202	
Retiree Representative	Detroit Firemen's Fund Association	Attn: Kim Fett	1301 Third St. Suite 329			Detroit	MI	48226	
Retiree Representative	Detroit Police Benefit and Protective Association	Attn: Delbert R. Jennings, Sr.	3031 W. Grand Boulevard, Suite 405			Detroit	MI	48202	
Retiree Representative	Detroit Retired City Employees Association	Attn: Shirley V. Lightsey	P. O. Box 40713			Detroit	MI	48240	
Police Representative	Detroit Fire Fighters Association IAFF Local 344; Detroit Police Officers Association; Detroit Police Lieutenants and Sergeants Association; and Detroit Police Command Officers Association	David M Eisenberg	400 Galleria Officentre Ste 444			Southfield	MI	48034	
Counsel for Detroit Fire Fighters Association IAFF Local 344; Detroit Police Officers Association; Detroit Police Lieutenants and Sergeants Association; and Detroit Police Command Officers Association	Erman Teicher Miller Zuckler & Freedman PC	Earle J Erman & Julie Beth Teicher	400 Galleria Officentre Ste 444			Southfield	MI	48034	
Counsel for U.S. Bank National Association (Top 20 Cashitor)	Faegre Baker Daniels LLP	Attn: Abby E. Wilkinson, Esq.	2200 Wells Fargo Center	90 South Seventh Street		Minneapolis	MN	55402-3901	
Union Representative	Field Engineers Association	Attn: Larry Hart	PO Box 252805			West Bloomfield	MI	48325	

**Exhibit B**  
**GSL/SSL 2002 List**  
**Served via First Class Mail**

Description	CreditorName	Address1	Address2	Address3	City	State	Zip	Country
Counsel for U.S. Bank National Association (Top 20 Chptor)	Foster, Swift Collins & Smith PC	32300 Northwestern Hwy., Suite 230			Farmington Hills	MI	48334	
Counsel for the Bank of New York Mellon	Fulbright & Jaworski LLP	666 Fifth Ave			New York	NY	10103-3198	
Counsel for the Detroit Public Library	Gold Lange & Majors PC	24901 Northwestern Hwy Ste 444			Southfield	MI	48075	
Counsel for US Health & Life Insurance Company	Gold Lange & Majors PC	24901 Northwestern Hwy Ste 444			Southfield	MI	48075	
The Office of the Governor of the State of Michigan	Governor Rick Snyder	P.O. Box 30013			Lansing	MI	48909	
Counsel for Defendants Greektown Casino and Detroit Entertainment LLC dba Motorcity Casino Hotel	Honigman Miller Schwartz and Cohn LLP	2290 First National Bldg	660 Woodward Ave		Detroit	MI	48226-3506	
Counsel for The Detroit Institute of Arts	T. O'Reilly	600 Woodward Ave	2290 First National Bldg		Detroit	MI	48226	
Counsel for HP Enterprise Services LLC	Ayala Hassell	5400 Legacy Dr			Plano	TX	75024	
Counsel for HP Enterprise Services LLC	Ken Hignman	12610 Park Plz Dr Ste 100			Cerritos	CA	90703	
Interested Party	Attn National Bankruptcy Coordinator	275 Viger East Ste 400			Montreal	QC	H2X 3R7	Canada
Counsel for IBM Credit LLC	IBM Credit LLC	Special Handling Group MD NC317	6303 Barfield Rd NE		Atlanta	GA	30328	
Counsel for Michigan Bell Telephone Company dba AT&T Michigan	Katten Muchin Rosenman LLP	525 W Monroe Ste 1900			Chicago	IL	60661	
Counsel for St Martins Cooperative	Law Offices of Lee & Correll	24901 Northwestern Hwy Ste 113			Southfield	MI	48075	
Counsel for the Retired Detroit Police and Fire Fighters Association; Donald Taylor; Shirley V Lightsey; and Detroit Retired City Employees Association	Lippitt O Keefe PLLC	370 E Maple Rd 3rd Fl			Birmingham	MI	48009	
Counsel for FK Park, LLC and FK South, LLC	Maddin, Hauser, Roth & Heller, P.C.	28400 Northwestern Hwy 2nd Fl			Southfield	MI	48034	
Counsel for Synovra Guarantee Inc	Brendan Frey	1361 E. Big Beaver Road			Troy	MI	48063	
Counsel for Bishop Real Estate, L.L.C.	Williamson PC	39533 Woodward Ave Ste 318			Bloomfield Hills	MI	48304	
Federation of State, County and Municipal Employees (AFL-CME), AFL-CIO	McKnight McClellan Canzano Smith & Radtke PC	400 Galleria Officentre Ste 117			Southfield	MI	48034	
Prerep	Nathaniel Brent	538 S Livernois			Detroit	MI	48209	
Office of the United States Trustee	Office of the United States Trustee	211 West Fort Street Suite 700			Detroit	MI	48226	
Union Representative	Police Officers Labor Council	19360 St. Louis St.			Detroit	MI	48234	
Union Representative	Police Officers Labor Council	518 Inkster Road			Dearborn Heights	MI	48127	
Counsel for Citimortgage, Inc.	Poteslivo & Associates PC	251 Diverston St			Rochester	MI	48307	
Interested Party	Primeshares World Markets, LLC	261 5th Ave 22nd Fl			New York	NY	10016	
Counsel enters an appearance for The Bank of New York Mellon (successor by operation of law to The Bank of New York), as custodian of the Police and Fire Retirement System of the City of Detroit Fund and as custodian of the General Retirement System of the City of Detroit Fund	Reed Smith LLP	225 Fifth Ave			Pittsburgh	PA	15222	
Interested Party	Ricoch USA Inc	3920 Arkwright Rd Ste 400			Macon	GA	31210	
Counsel for Robbie Flowers, Michael Wells, Janet Whitson, Mary Washington and Bruce Goldman ("Flowers plaintiffs"); and Detroit Police Command Officers Association ("DPCOA"); Detroit Fire Fighters Association, I.A.F.F. Local 344	Mary Ellen Gurewitz	2211 E Jefferson Ave Ste 200			Detroit	MI	48207	
Union Representative	Sanitary, Chemists & Technicians Association	2727 Second Ave. Rm. 314 - D			Detroit	MI	48201	
Counsel for Ambac Assurance Corporation	Schafer and Weiner PLLC	40950 Woodward Ave Ste 100			Bloomfield Hills	MI	48304	
Counsel for DEPPFA Bank PLC	Schiff Hardin LLP	233 S Wacker Dr Ste 6600			Chicago	IL	60606	
SPC	Securities & Exchange Commission	175 W Jackson Blvd	Suite 900		Chicago	IL	60604-2815	
Union Representative	Senior Accountants, Analysts & Appraisers Association	65 Cadillac Square, Ste. 2905			Detroit	MI	48226	



**Exhibit 2**

**PROPOSED ORDER**

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

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**[PROPOSED] ORDER GRANTING CITY OF DETROIT’S JULY 2024  
MOTION FOR AUTHORITY TO MODIFY THE CONFIRMED PLAN OF  
ADJUSTMENT TO REVISE THE “DROP” PROGRAM FOR CERTAIN  
POLICE OFFICERS**

This matter, having come before the court on the *City of Detroit’s July 2024 Motion for Authority to Modify the Confirmed Plan of Adjustment to Revise the “DROP” Program for Certain Police Officers* (“Motion,” Doc. No. 13908); and the Court having jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and Article VII of the Plan; and due and proper notice of the Motion having been given as provided in the Motion; and it appearing that no other or further notice of the Motion need be given; and a hearing on the Motion having been held before the Court; and any objections or other responses to the Motion having been overruled or withdrawn; and the Court finding that the legal and factual bases set forth in the Motion and at the hearing establish just cause for the relief granted; and the Court being fully advised in the premises; and there being good cause to grant the relief requested,

**THE COURT ORDERS THAT:**

1. The Motion is granted as set forth herein.
2. The City may amend paragraph (3) of section 12.1 of the New PFRS

Active Pension Plan<sup>1</sup> with language that is substantially similar to the following:

(3) Notwithstanding paragraph 2 of this section or any other provision of this Plan, a member of the Detroit Police Officers Association shall be entitled to participate in the DROP program under the Component I for the maximum of ten (10) years. At the end of such ten (10) year period of participation in the DROP program, the member shall be retired and separated from employment. **If, however, at the time of the scheduled DROP retirement date, the Chief of Police determines that the skill set or value of the member who is retiring would result in a hardship on department needs or operations, the Chief of Police after mutual agreement with the member may grant an extension of the retirement date in one year increments not to exceed an additional five (5) years for a total of fifteen (15) total years in the DROP. A member granted this extension shall continue to be subject to the below listed criteria.**

A member who is participating in the DROP program pursuant to this paragraph §12.1(3) or pursuant to Component II of the Police and Fire Retirement System must be able to perform the essential functions of a police officer, assigned for the duration of his or her participation in the DROP program. Provided, however, that if a member, while participating in the DROP program pursuant to this paragraph § 12.1(3) or Component II of the Police and Fire Retirement System requires and is granted restricted duty for 365 consecutive days or more, that member may be retired and separated from employment after the end of such

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<sup>1</sup> Capitalized but undefined terms have the meanings ascribed to them in the Motion.

granted time period if the member is unable to perform the essential functions of a police officer.

While participating in the DROP program pursuant to paragraph §12.1(3) or pursuant to Component II of the Police and Fire Retirement System, a member of the Detroit Police Officers Association must receive bi-annual satisfactory performance evaluations according to the performance evaluation standards then in place for sworn officers. Any such member who receives an unsatisfactory performance evaluation shall be entitled to the appeals process then in place, as well as final review by the Chief of Police. If a member receives a second unsatisfactory evaluation, that member may be retired and separated from employment. Additionally, if a participating member receives consecutive adjudicated findings of misconduct, that member may be retired and separated from employment subject to an appeal and final review of the Chief of Police.

3. Nothing in this Order is intended to constitute, will constitute, or may be deemed as constituting the City's consent under section 904 of the Bankruptcy Code to this Court's interference with (a) any of the political or governmental powers of the City, (b) any of the property or revenues of the City or (c) the City's use or enjoyment of any income-producing property.

4. The Court retains jurisdiction over any and all matters arising from the interpretation or implementation of this Order.