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

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| In re:<br>City of Detroit, Michigan,<br>Debtor. | Bankruptcy Case No. 13-53846<br>Judge Thomas J. Tucker<br>Chapter 9 |

# CITY OF DETROIT'S MOTION FOR FINAL DECREE

On December 11, 2025, the Court entered its *Order Requiring the City to File Either a Motion for a Final Decree or a Further Status Report by April 15, 2026* ("Order," Doc. No. 14000). The Order states that by April 15, 2026, the City of Detroit ("City") must file either a motion for a final decree or a further status report to update the December 9, 2025, status report ("Prior Status Report," Doc. No. 13999).

In accord with the Court's Order, the City now files this Motion seeking a final decree in this bankruptcy case, respectfully stating as follows:

## I. Introduction

This bankruptcy case may be closed when administration is complete. 11 U.S.C. § 945. The City believes that administration of its bankruptcy case is substantially complete and no longer requires Court supervision. Accordingly, a final decree may be entered.

As noted in the Prior Status Report, as of the end of 2025, the main work remaining in this bankruptcy case was to complete Distributions to Holders of Allowed Class 14 Claims. The City has distributed 96% of the New B Notes[1] allocated for Distribution (amounting to $19.2 million in face value). Recipients of these New B Notes account for approximately two-thirds in number of all Holders of Allowed Class 14 Claims. The City will continue efforts to distribute New B Notes to the remaining Holders of Class 14 Claims until either all such Holders have received Distribution of their New B Notes or it becomes clear that further commercially reasonable efforts will not be successful.

Related to these efforts, on March 26, 2026, the City filed its *Supplemental Notice of First and Final Distribution and Distribution Date* ("Interest Distribution Notice," Doc. No 14005). Ever since the New B Notes were issued, they have been held by a Distribution Agent who has collected the interest the City has paid on the New B Notes on the behalf of the Holders of Allowed Class 14 Claims. The Interest Distribution Notice lists the Holders of Allowed Class 14 Claims who are entitled to receive this accrued interest, along with the amount of interest attributable to each

[1] Terms capitalized but not defined in this Report have the meanings ascribed to them in the City's *Eighth Amended Plan for the Adjustment of Debts of the City of Detroit* ("Plan"), as filed as Docket Number 8045 and confirmed with minor modifications by this Court's order filed at Docket Number 8272.

Holder's Allowed Class 14 Claim.[2] The City began authorizing Distributions on April 9, 2026, the date stated in the Interest Distribution Notice. Most Distributions are being paid by checks sent via UPS (or the US Postal Service, where the recipient's address is a Post Office Box) to Holders of Allowed Class 14 Claims. The largest claims will likely be paid by wire or ACH transfer.

As of the date this Motion is filed, the City is informed by its Distribution Agent that most or all of the checks to be delivered via UPS or USPS have been sent out. Additionally, wire and ACH transfers to Class 14 Claimants have begun.

The City stated in its Prior Status Report that, once it had completed its first Distribution attempt of accrued interest to Class 14 Claimants, it intended to file a motion with this Court seeking a final decree. This is that motion.

## II. Jurisdiction and Venue

1. This Court has jurisdiction over this Motion under 28 U.S.C. §§ 157 and 1334 and the Plan.

2. This Court expressly retained jurisdiction to enter a final decree in this bankruptcy case. Plan, Art. VII.P, p. 71.

[2] Since the Interest Distribution Notice was filed on March 26, 2026, monthly interest for the month of March 2026 was credited to the trust account. Additionally, the City made its April 1, 2026, interest payment on New B Notes and there was a small bond redemption, both of which accrued for the benefit of the 4% of New B Notes not yet distributed. Accordingly, the amounts to be distributed to Class 14 Claimants are slightly higher than was reflected in the Interest Distribution Notice.

3. This is a core proceeding under 28 U.S.C. § 157(b)(2)(A).

4. Venue is proper before this Court under 28 U.S.C. § 1409.

## III. This case has been "fully administered."

5. In the City's confirmed Plan, the Court retained jurisdiction to "[e]nter a final decree closing the Chapter 9 Case pursuant to section 945(b) of the Bankruptcy Code[.]" Plan, Art. VII.P (Doc. No. 8045, p. 78 of 82; Doc. No 8272, p. 211 of 225).

6. Section 945(b) states that "Except as provided in subsection (a) of this section, the court shall close the case when administration of the case has been completed." 11 U.S.C. § 945(b). Subsection (a) states that a bankruptcy court may retain jurisdiction to assure successful plan implementation. 11 U.S.C. § 945(a).

7. The Bankruptcy Code does not explain when administration of a chapter 9 case is complete and, to the City's knowledge, only one reported decision has addressed the question. *In re Lake Lotawana Cmty. Improvement Dist.*, Case No. 10-44629-can9; 2017 WL 1968282 (Bankr. W.D. Mo. May 11, 2017).

8. The *Lake Lotawana Community Improvement District* court noted that neither the Bankruptcy Code nor the Bankruptcy Rules offers guidance as to when a chapter 9 case has been administered. *Id.* at *2. The court then observed

> Returning to § 945(b) then, cannons of statutory construction require that when Congress does not define a term, courts must give it its ordinary meaning. *Taniguchi v. Kan Pac. Saipan, Ltd.*, 566 U.S. 560, 566 (2012).

> Black's Law Dictionary defines "administration" as the "judicial action in which a court undertakes the management and distribution of property." Black's Law Dictionary 49 (9th ed. 2009).

*Id.* at *3.

9. Thus, the court determined that a case is administered when there is no longer anything for the court to manage in the case. *Id.*

10. In this case, the vast majority of New B Notes have been Distributed to Holders of Allowed Class 14 Claims. The City also has filed its Interest Distribution Notice and has begun making Distributions. These are the final tasks the City intended to undertake before moving for a final decree. These tasks can be completed without further Court supervision.

11. Filings in the case reflect that this case is winding down. Only 20 items have been filed on the docket in the last six months (Oct. 15, 2025 – Apr. 15, 2026) and five of those were merely certificates of service. The only matters brought to this Court's attention during the last six months were

(a) The adjustment of a retiree's ASF recoupment withholding (Doc. Nos. 13987-90, 13994-97, 14001-04);

(b) The striking of a filing by a party who remains enjoined from filing frivolous matters with the Court (Doc. Nos. 13991-93);

(c) An attorney appearance (Doc. No. 13998);

(d) The City's Prior Status Report (Doc. Nos. 13999-14000); and

(e) The City's Supplemental Notice that it would begin Distributing accrued interest on Class 14 B Notes (Doc. Nos. 14005-06).

12. The only orders that the Court entered during this time were related to docket management (e.g., Doc. No. 13993, 13995, 14002) or case monitoring (e.g. Doc. No. 14000). Thus, the case docket evidences that administration of the City's bankruptcy case is complete from a "judicial action" perspective. *Lake Lotawana Cmty. Improvement Dist.*, 2017 WL 1968282 at *3. The case may be closed.

## IV. Official duties of the City's Claims Agent may cease.

13. On July 19, 2013, the City moved the Court to permit Kurtzman Carson Consultants, LLC[3] ("Claims Agent") to undertake tasks including, but not limited to, management of the City's claims register. Doc. No. 19.

14. These tasks included providing bankruptcy case related noticing services, maintaining creditor lists, and processing proofs of claim. *Id.*, ¶ 20.

15. The tasks also included asking the City to submit an order to the Court dismissing the Claims Agent from its duties and terminating its official services and responsibilities upon closing of this case. *Id.*, ¶ 20(m). At such time, the Claims Agent is to deliver to the Court the final version of the Claims Register that it maintains along with other related documents. Specifically,

> (n) within seven days of notice to the Noticing Agent of entry of an order closing this case, provide to the Court the final version of the

[3] The Claims Agent is now named Verita Global. *See* https://veritaglobal.net/detroit ("Kurtzman Carson Consultants, LLC (KCC) has rebranded as Verita Global. All existing KCC URLs and email addresses will be automatically redirected. KCC will remain as a legal entity as we make this transition.")

> Claims Register as of the date immediately before the close of the case; [and]
>
> (p) at the close of the case (i) deliver the Claims Register, claims and supporting documentation to the Clerk's Office in electronic format in accordance with the procedures set forth in this Court's Administrative Order No. 13-08, (ii) deliver all other original documents in the format and to the location provided by the Clerk's Office and (iii) retain and not destroy or deliver to the Clerk of the Court the Claims Register, claims and supporting documentation, unless and until specifically authorized to do so by order of the Court.

*Id.*, ¶ 20(n), (p).

16. Local Bankruptcy Rule 2002-1(e) states that the order appointing a claims agent under 28 U.S.C. § 156(c) will include specific language similar to the above "[u]nless otherwise ordered by the Court." The order appointing the Claims Agent does not contain the suggested language, meaning that the Court "ordered otherwise." Doc. No. 297. That said, the language quoted above is substantially similar to that noted in the local rule.

17. The Court approved the Claims Agent's engagement. Doc. No. 297.

18. The City believes that all official duties that require Court involvement have completed. That said, the City wishes to continue working with those few Class 14 Claimants who have not yet been able to receive their New B Notes for one reason or another.

19. Thus, although the City believes that the Claims Agent can be released from its official duties to the Court, the City intends to continue working with the

Claims Agent for at least a few more months to attempt to maximize Distributions to Allowed Class 14 Creditors.

20. The proposed final decree attached as Exhibit 1 thus requires the Claims Agent to turn over copies of its records to the Court but permits the Claims Agent to continue to work with the City while the City completes final Distributions to Allowed Class 14 Creditors.

## V. Conclusion

21. For the reasons described above, the City respectfully asks that the Court enter the final decree attached as Exhibit 1, closing this bankruptcy case.

Dated: April 15, 2026

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

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

| | |
|---|---|
| In re: | Bankruptcy Case No. 13-53846 |
| City of Detroit, Michigan, | Judge Thomas J. Tucker |
| Debtor. | Chapter 9 |

## EXHIBIT LIST

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|---|---|
| Exhibit 1 | Proposed Final Decree |
| Exhibit 2 | Notice of Opportunity to Object |
| Exhibit 3 | None |
| Exhibit 4 | Certificate of Service |

**EXHIBIT 1 – PROPOSED ORDER**

**UNITED STATES BANKRUPTCY COURT**
**EASTERN DISTRICT OF MICHIGAN**
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**FINAL DECREE CLOSING**
**THE CITY OF DETROIT'S BANKRUPTCY CASE**

This matter, having come before the Court on the *City of Detroit's Motion for Final Decree* ("Motion"),[1] upon proper notice and a hearing, 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.

2. The Court finds that administration of the City's bankruptcy case has been completed, within the meaning of Bankruptcy Code section 945(b).

3. As soon as is reasonably practicable, but no later than 30 days from entry of this Order, the Claims Agent must work with the Clerk of the Court to

   (a) provide to the Clerk the final version of the Claims Register as of the date this Order is entered;

[1] Undefined capitalized terms have the meanings ascribed to them in the Motion.

(b) deliver all claims and supporting documentation to the Clerk in electronic format in accordance with the procedures set forth in this Court's Administrative Order No. 13-08; and

(c) deliver all other original documents in the format and to the location provided by the Clerk.

4. Upon completion of the tasks described in the preceding paragraph, the Claims Agent's official duties to the Court will be complete. Notwithstanding the forgoing, the Claims Agent may continue working with the City to assist the City as the City may deem necessary and appropriate, including, but not limited to, assisting further Distributions to Holders of Allowed Class 14 Claims, with the full protections provided to the Claims Agent under the Plan and prior Orders entered by this Court.

5. Under Bankruptcy Code section 945(b) and Article VII, Section P of the City's Plan, this bankruptcy case is closed, subject to the continuing jurisdiction provided under Bankruptcy Code section 945(a).

6. Service of the Motion as evidenced by the certificate[s] of service filed by the Claims Agent at Docket Number[s] _____ is sufficient. No further service of the Motion or of this Order is necessary or required.

7. The Court retains jurisdiction over any matters that may arise from enforcement, interpretation, or implementation of this Order.

**EXHIBIT 2 – NOTICE**

**UNITED STATES BANKRUPTCY COURT**
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**SOUTHERN DIVISION**

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**NOTICE OF OPPORTUNITY TO OBJECT TO**
**CITY OF DETROIT'S MOTION FOR FINAL DECREE**

The City of Detroit has filed papers with the Court requesting the entry of a final decree, closing this bankruptcy case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney.**

If you do not want the Court to enter a final decree closing the City's bankruptcy case, 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 W. Fort St., Suite 1900
Detroit, Michigan 48226

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

If you mail your response to the court for filing, you must mail it early enough so that the court will **receive** it on or before the date stated above. You must also mail a copy to:

Miller, Canfield, Paddock & Stone, PLC
Attn: Marc N. Swanson
150 West Jefferson, Suite 2500
Detroit, Michigan 48226

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 that 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.**

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

By: /s/ Marc N. Swanson
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Dated: April 15, 2026

# EXHIBIT 3 – NONE

**EXHIBIT 4**

**UNITED STATES BANKRUPTCY COURT**
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## CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2026, I electronically filed the *City of Detroit's Motion for Final Decree* (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 and the General Service List, each maintained by the Noticing Agent. The Noticing Agent will file a Proof of Service after it has performed the service.

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Dated: April 15, 2026