

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

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**REPLY IN SUPPORT OF DEBTOR'S
THIRTIETH OMNIBUS OBJECTION TO CERTAIN CLAIMS
(INSUFFICIENT DOCUMENTATION)**

The City of Detroit ("City"), by its undersigned counsel, files this reply in support of its *Thirtieth Omnibus Objection to Certain Claims* ("Objection," Doc. No. 10786), stating as follows:

1. On February 26, 2016, the City filed its Objection. The following individuals filed responses to the Objection:¹

- (a) Response filed by George M. Pieprzyk [Doc. No. 10903] ("Pieprzyk Response").² Pieprzyk's proof of claim and his response to the Objection are attached as Exhibits 1 and 2.
- (b) Response filed by Jacqueline Knowles [Doc. No. 10863] ("Knowles Response"; and collectively with the Pieprzyk

¹ Additional responses were filed, but all other responses were either stricken for filing deficiencies or will be handled via a separate procedure recently approved by the Court. [Doc. No. 10941.] As noted below, both Responses are subject to pending deficiency notices.

² A deficiency noticed was entered by the Court on March 23, 2016. [Doc. No. 10918]. The deficiency has not yet been cured.

Response, the “Responses”).³ Knowles’s proof of claim and his response to the Objection are attached as Exhibits 3 and 4.

Pieprzyk Response

2. The Pieprzyk Response should be overruled. The Objection stated that Pieprzyk’s proof of claim lacked any documentation showing that the City owed him the money claimed.⁴ His proof of claim states that he is owed \$140,000 for “30 years of service ½ of my life” as well as for stress and other reasons. Ex. 1. In response to the Objection, he states “I George M Pieprzyk do not want the court to eliminate or change my claim # 1906.” Ex. 2. Neither filing constitutes documentation evidencing any claim against the City at all, much less a claim in the amount of \$140,000. The Objection should be sustained as to this claim.

Knowles Response

3. The Knowles Response also should be overruled. The Objection objected to Knowles’s proof of claim because it lacked any documentation showing that the City owed her \$18,150. Knowles’s proof of claim simply states that the City owes her for “Loss of financial income, Forfeit of contract by City of Detroit.” Ex. 3. The Knowles Response provides no further assistance in understanding the basis for her claim. In the Knowles Response, Knowles

³ A deficiency noticed was entered by the Court on March 21, 2016. [Doc. No. 10869]. The deficiency has not yet been cured.

⁴ Indeed, Federal Rule of Bankruptcy Procedure 3001(c)(1) notes that a claim based on writings must be filed with the documentation supporting it.

expresses anger that the City filed for bankruptcy protection, but provides no documentation explaining why the City owes her money. Ex. 4. As such, it fails to respond to the Objection, and the Objection should be upheld as to this claim.

CONCLUSION

For these reasons, the City asks the Court to overrule the Responses and sustain the City's Objection to these claims.

Dated: March 25, 2016

By: /s/ Marc N. Swanson

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ATTORNEYS FOR THE CITY OF DETROIT

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT		EASTERN DISTRICT of MICHIGAN		CHAPTER 9 PROOF OF CLAIM	
Name of Debtor: City of Detroit, Michigan			Case Number: 13-53846		
NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing.					
Name of Creditor (the person or other entity to whom the debtor owes money or property):					
Name and address where notices should be sent: George M. Pieprztk 22527 Fullerton Detroit 48223-3106 mich				<input type="checkbox"/> Check this box if this claim amends a previously filed claim. 2014 FEB 26 10 32 COURT USE ONLY MICHIGAN BANKRUPTCY COURT Court Claim Number: DETROIT (If known) Filed on: _____	
Telephone number: 313 531 6513 email: _____				<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving _____ RECEIVED	
Name and address where payment should be sent (if different from above):					
Telephone number: _____ email: _____					
1. Amount of Claim as of Date Case Filed: \$ 140,000				FEB 24 2014 KURTZMAN CARSON CONSULTANTS	
If all or part of the claim is secured, complete item 4. If all or part of the claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.					
2. Basis for Claim: 30 years of service to my wife stress & physical disability					
3. Last four digits of any number by which creditor identifies debtor: _____			3a. Debtor may have scheduled account as: _____		
4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information.				Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$ _____	
Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: _____				Basis for perfection: _____	
Value of Property: \$ _____				Amount of Secured Claim: \$ _____	
Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed or <input type="checkbox"/> Variable				Amount Unsecured: \$ _____	
5. Amount of Claim Entitled to Priority as an Administrative Expense under 11 U.S.C. §§ 503(b)(9) and 507(a)(2). \$ _____					
5b. Amount of Claim Otherwise Entitled to Priority. Specify Applicable Section of 11 U.S.C. § _____ \$ _____					
6. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)					
7. Documents: Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. (See instruction #7, and the definition of "redacted".) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:					
8. Signature: (See instruction # 8) Check the appropriate box.					
<input checked="" type="checkbox"/> I am the creditor. <input type="checkbox"/> I am the creditor's authorized agent. <input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. <input type="checkbox"/> I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.) (See Bankruptcy Rule 3004.)					
I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.					
Print Name: George M Pieprztk				George M Pieprztk (Signature)	
Title: Field Investigator				2-15-2014 (Date)	
Company: Water Department, DWS&D					
Address and telephone number (if different from notice address above): _____					

EXHIBIT 2

Wk 3-12-16

I George M Piepryk Do Not
WANT The COURT To Eliminate,
OR change my Chain #

George M Piepryk

CASE # 13-5384

U.S. DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
DETROIT

2016 MAR 22 A 10: 14

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EXHIBIT 3

B10 (Official Form 10) (04/13) (Modified)

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT of MICHIGAN

Name of Debtor: City of Detroit, Michigan

Case Number: 13-53846

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NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing.

Name of Creditor (the person or other entity to whom the debtor owes money or property): Jacqueline Knowles

FEB 20 2014

Name and address where notices should be sent: 15015 Stahelin Rd

COURT USE ONLY
US Bankruptcy Court
MI Eastern District
Court Claim Number: (if known)

Telephone number: 313 412-9007 email: Jackie_Knowles@ymail.com

Filed on:
Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement of claim.

Name and address where payment should be sent (if different from above): SAME

RECEIVED

1. Amount of Claim as of Date Case Filed: \$18,150, 2009-2013

FEB 24 2014

If all or part of the claim is secured, complete item 4. If all or part of the claim is entitled to priority, complete item 5.

Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.

KURTZMAN CARSON CONSULTANTS

2. Basis for Claim: Loss of financial income forfeit of contract by City of Detroit

3. Last four digits of any number by which creditor identifies debtor:

3a. Debtor may have scheduled account as:

4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information.

Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$

Nature of property or right of setoff: Real Estate Motor Vehicle Other

Basis for perfection:

Describe: Value of Property: \$

Amount of Secured Claim: \$

Annual Interest Rate (when case was filed) % Fixed or Variable

Amount Unsecured: \$

5. Amount of Claim Entitled to Priority as an Administrative Expense under 11 U.S.C. §§ 503(b)(9) and 507(a)(2): \$

5b. Amount of Claim Otherwise Entitled to Priority. Specify Applicable Section of 11 U.S.C. §: \$

6. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)

7. Documents: Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. (See instruction #7, and the definition of "redacted".) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:

8. Signature: (See instruction # 8) Check the appropriate box.

I am the creditor. I am the creditor's authorized agent. I am the trustee, or the debtor, or their authorized agent. I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3004.) (See Bankruptcy Rule 3005.)

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.

Print Name: Jacqueline Knowles Title: SA III Company: City of Detroit Address and telephone number (if different from notice address above):

Signature: Jacqueline Knowles Date: 2/13/14

Telephone number: 313 412-9007 email: Jackie_Knowles@ymail.com

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

EXHIBIT 4

March 18, 2016

Clerk of the Court
United States Bankruptcy Court
211 W. Fort Street, Suite 2100
Detroit, MI 48226

Marc N. Swanson
Miller, Canfield, Paddock and Stone, PLC
150 West Jefferson, Suite 2500
Detroit, MI 48226

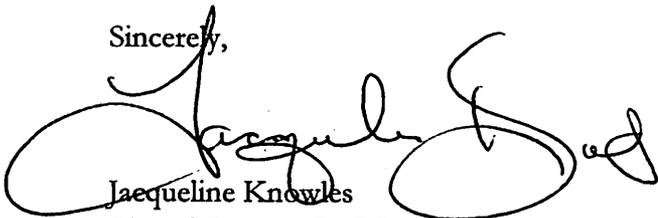
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2016 MAR 21 A 11:09
U.S. BANKRUPTCY COURT
E.D. MICHIGAN-DETROIT

Re: Bankruptcy Case No. 13-53846

Dear, Honorable Thomas J. Tucker:

I am submitting this letter to oppose and prevent the modification, expunge, elimination or disallowing of my claim. The City of Detroit frivolous mismanagement of funds is of no doing by city employees. Therefore city employees should not be punished or held accountable. It was reported Thursday, March 17, 2016 by Channel 4 News that \$50 million dollars was discovered in bond funds which had gone unspent over several decades and \$11.7 million dollars is to be utilized on forty city parks and playgrounds and the remaining funds will pay to build a high-tech real-time crime center and to construct a new 8th Precinct for the Police Department. Yet, the City of Detroit filed bankruptcy and illegally took money from our employee' pension and annuity fund. Many corporations, citizens, and most importantly the employees was misled and misrepresented by city government. City employees' should not be made a scapegoat for the poor decisions, poor investments and unprofessional conduct made by city government. The employees' voiced opinion was disregarded when given the opportunity to elaborate on the irrational decisions made by the city. The accountabilities lies on city government but employees and retirees has endured the burden. The city government has caused financial hardship to many pensioners' and employees' lively hood. The City of Detroit's actions has been unconstitutional, and it would be immoral if city government was not held accountable. All involved in this lawsuit against the city government should be compensated and made hold for the many lives the city have ruined. The City of Detroit have an obligation to represent their employees, citizens, and corporates with the upmost respect, honest and dignity and have failed to do so.

Sincerely,



Jaqueline Knowles
City of Detroit, OAHII