

**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  
THIRTY-THIRD OMNIBUS OBJECTION TO CERTAIN CLAIMS**  
**(INSUFFICIENT DOCUMENTATION)**

The City of Detroit ("City"), by its undersigned counsel, files this reply in support of its *Thirty-Third Omnibus Objection to Certain Claims* ("Objection," Doc. No. 10789), stating as follows:

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

- (a) Response filed by Raju K. Markose [Doc. No. 10861] ("Markose Response").<sup>2</sup> Markose's proof of claim and his response to the Objection are attached as Exhibits 1 and 2.
- (b) Response filed by Robert A. Lukasik [Doc. No. 10900] ("Lukasik Response"; and collectively with the Markose

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<sup>1</sup> 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.

<sup>2</sup> A deficiency noticed was entered by the Court on March 21, 2016. [Doc. No. 10868]. The deficiency has not yet been cured.

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

## **Markose Response**

2. The Markose Response should be overruled. The Objection stated that Markose’s proof of claim lacked any documentation showing that the City owed him the money claimed.<sup>4</sup> His proof of claim states that he is owed \$500,000 for “Breach the Original Employment Contract.” Ex. 1. In response to the Objection, he purportedly provides a breakout of how he arrived at this figure. As discussed below, Markose appears to be trying to justify after the fact a claim amount that was completely unsupported when he filed the claim.

3. He first claims \$333,407 for a “Call Back,”<sup>5</sup> which the City believes he arrived at by taking his ASF Recoupment<sup>6</sup> and adding 5% compound interest

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<sup>3</sup> A deficiency noticed was entered by the Court on March 23, 2016. [Doc. No. 10917]. The deficiency has not yet been cured.

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

<sup>5</sup> The City believes Markose means “claw back.”

<sup>6</sup> ASF Recoupment is described in the Confirmation Opinion at pages 41-45. [Doc. No. 8993]. The Plan addresses ASF Recoupment at pages 4 and 40-42. [Doc. No. 8045]. As set forth in the Confirmation Opinion, in the City’s long-standing Annuity Savings Fund Program, general retirement system (“GRS”) employees could voluntarily contribute a percentage of their gross pay to a separate pension account. The GRS then invested these ASF contributions with the other GRS assets that the City contributed or that GRS earned on its investments. Each participant’s ASF account increased in value based on the participant’s contributions and the interest that the GRS credited to that account. For many

*Continued on next page.*

for 30 years. Ex. 2. The third claim in his response also appears to relate to ASF Recoupment. These claims are factually impossible. Markose filed his claim on February 20, 2014. Ex. 1. The City filed its first Plan and Disclosure Statement on February 21, 2014, the day after Markose filed his claim. *See* Disclosure Statement, Doc. No. 2708, Art. II.B.3.u.ii.D (page 39 of 1200 in the filing) (discussing Annuity Savings Fund Account restitution). The specific terms of the ASF Recoupment were not agreed upon until a later date. Thus, Markose's reference to the ASF Recoupment appears to be an after-the-fact attempt to justify his \$500,000 round number.

4. In any event, Markose cannot file a claim for ASF Recoupment as the handling of this matter is dictated by the confirmed Plan. Plan, Doc. No. 8045, Art. II.B.3.r.ii.D (page 47 of 82 in the filing). He cannot object to the Plan in a response to a claim objection, as that would be an impermissible collateral attack on the Plan and the order confirming it. *See DeLorean v. Gully*, 118 B.R. 932, 935 n.1 (E.D. Mich. 1990) (noting that a collateral attack is a request for relief, which, if granted, "must in some fashion overrule a previous judgment.") (citation and quotation marks omitted). Thus, these portions of his claim are impermissible.

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*Continued from previous page.*

years, the GRS credited interest in each participant's ASF account at the assumed rate of return even when the actual rate of return was less. Consequently, as part of the global pension settlement, the City and the retiree committee agreed that a certain amount of the excess interest paid to ASF participants would be recouped.

5. Markose next claims he is owed \$247,500 because his pension was frozen by operation of the City's bankruptcy and its confirmed Plan. Again, this is by design of the Plan. *See* Plan, Art. II.B.3.r.ii.C. If Markose wished to object to the Plan, he should have done so earlier. He cannot do so now. *DeLorean*, 118 B.R. at 935 n.1.

6. Markose's final statement in his response all but confirms that he is simply trying to back into the original claim amount of \$500,000. His would-be claims total to \$624,127, but he affords the City a credit of \$124,127. He attributes this credit to a "life expectancy shortfall," but a more credible explanation is that Markose was unable to retroactively calculate a claim of \$500,000 and thus he is now attempting to find a justification for why he declared "under penalty of perjury" that the City owed him half a million dollars.

7. In short, Markose's proof of claim lacks documentation. The Markose Response purports to provide the necessary documentation, but the documentation provided shows that either his original claim was unsupported or was made for amounts that he is not entitled to claim under the confirmed Plan. Either way, the Objection should be sustained as to this claim.

### **Lukasik Response**

8. The Lukasik Response also should be overruled. The Objection objected to Lukasik's proof of claim because it lacked any documentation showing

that the City owed him \$32,218.82. Lukasik's proof of claim simply states that the City owes him for "services performed." Ex. 3. The Lukasik Response sheds no further light on the basis for this claim. In the Lukasik Response, Lukasik merely acknowledges that he received the Objection and that he opposes it. Ex. 4. He does not explain how he arrived at the figure he claims or provide supporting documentation for it. *Id.* Thus, the Lukasik Response 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  
Jonathan S. Green (P33140)  
Marc N. Swanson (P71149)  
MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 496-7591  
Facsimile: (313) 496-8451  
green@millercanfield.com  
swansonm@millercanfield.com

and

Charles N. Raimi (P29746)  
Deputy Corporation Counsel  
City of Detroit Law Department  
2 Woodward Avenue, Suite 500  
Coleman A. Young Municipal Center  
Detroit, Michigan 48226  
Telephone: (313) 237-5037  
Facsimile: (313) 224-5505  
raimic@detroitmi.gov

ATTORNEYS FOR THE CITY OF DETROIT

EXHIBIT 1

**FILED**  
PROOF OF CLAIM

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT of MICHIGAN

Name of Debtor: City of Detroit, Michigan Case Number: 13-53846

**FEB 21 2014**

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):  
RAJU K MARKOSE

**US Bankruptcy Court  
MI Eastern District**

Name and address where notices should be sent:  
RAJU K. MARKOSE  
16929 RYAN, LIVONIA, MI 48154  
734 261 8343

Check this box if this claim amends a previously filed claim.

Court Claim Number: \_\_\_\_\_  
(If known)

Filed on: \_\_\_\_\_

Telephone number: \_\_\_\_\_ email: Kuttipurathu@gmail.com

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 details.

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

**RECEIVED**

Telephone number: 313 729 6856 email: markose@dwsd.org

**FEB 24 2014**

1. Amount of Claim as of Date Case Filed: \$ 500,000.00  
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: Breach the Original Employment Contract  
(See instruction #2)

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

3a. Debtor may have scheduled account as: NA  
(See instruction #3a)

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.  
Nature of property or right of setoff:  Real Estate  Motor Vehicle  Other  
Describe: \_\_\_\_\_  
Value of Property: \$ \_\_\_\_\_  
Annual Interest Rate (when case was filed) \_\_\_\_\_ %  Fixed or  Variable

Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$ \_\_\_\_\_  
Basis for perfection: \_\_\_\_\_  
Amount of Secured Claim: \$ \_\_\_\_\_  
Amount Unsecured: \$ 500,000.00

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.)

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: RAJU K MARKOSE  
Title: General Plant Supervisor  
Company: City of Detroit Water Dept  
Address and telephone number (if different from notice address above): \_\_\_\_\_

(Signature) [Signature] (Date) 2/20/14

Telephone number: \_\_\_\_\_ email: \_\_\_\_\_

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 2

From

Raju Markose  
16929 Ryan Road,  
Livonia, MI 48154.

**FILED**

**2016 MAR 21 A 10:59**

To

**U.S. BANKRUPTCY COURT  
E.D. MICHIGAN-DETROIT**

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

Honorable Thomas J. Tucker

Sub : Filing objection for the City's claim for relief petition – Bankruptcy case # 13-53846.

Ref : Bankruptcy Case No. 13-53846 – Debtor's Thirty-Third Omnibus Objection to Certain Claims.

The following are the detailed Claims and City has the all the documents as the living testimony.

Claim # 1 : Call Back amount of \$ 75,000.00 with 5% annual interest for 30 more years of life span-

Claim Amount: \$ 333407.00

Claim # 2 : Due to Bankruptcy, my pension calculation for Annual Final Compensation was frozen on June 30<sup>th</sup>, 2014 resulted in loss of \$15,000.00 AFC- 55% of AFC as the pension loss of \$8250.00/yr for 30 yrs.

Claim Amount: \$247,500.00

Claim # 3 : Recoupment amount taken out all taxes tax paid of \$ 10,000.00 for 30 yrs @ 5% interest

Claim Amount: \$ 43220.00

Total Claim Amount: \$624127.00

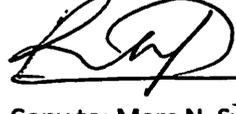
Actual Claim Amount: \$ 500,000.00

An amount of \$ 124127.00 reduced in lieu with life expectancy shortfall.

I hereby requesting to your Honor to approve the claim amount of \$500,000.00 and dismiss the City attorney's request to Modify, Disallow and/or Expunge the claim.

Respectfully yours,

Raju Markose



3/17/16

Copy to: Marc N. Swanson

Miller, Canfield, Paddock and Stone, PLC

150 W. Jefferson, Suite 2500

Detroit, MI 48226.

ITEM # 1

**General Retirement System City of Detroit  
Annuity Savings Fund Recoupment Calculation**

2/16/16 8:08 am

Name Markose, Raju

**GRS Annuity Savings Fund Account**

**Bankruptcy ASF  
Adjustment**

<i>fiscal year</i>	<i>begin balance</i>	<i>yearly contribution</i>	<i>yearly interest</i>	<i>yearly adjustment</i>	<i>yearly dividend</i>	<i>end balance</i>	<i>excess interest *1</i>
2003-2004	113,169.74	4,951.73	9,131.28	0.00	0.00	127,252.75	
2004-2005	127,252.75	4,611.03	10,228.30	0.00	1,904.03	142,092.08	1,904.03
2005-2006	143,996.11	4,831.70	11,774.93	0.00	21,639.61	160,602.74	21,639.61
2006-2007	182,242.35	5,072.39	14,593.80	0.00	30,459.32	201,908.54	30,459.32
2007-2008	232,367.86	6,571.24	18,616.08	0.00	0.00	257,555.18	18,616.08
2008-2009	257,555.18	5,622.40	20,564.48	0.00	0.00	283,742.06	20,564.48
2009-2010	283,742.06	4,519.56	22,589.73	0.00	0.00	310,851.35	9707.84
2010-2011	310,851.35	4,307.63	24,720.71	0.00	0.00	339,879.69	
2011-2012	339,879.69	6,097.75	27,592.64	0.00	0.00	373,570.08	25794.68
2012-2013	373,570.08	6,956.58	21,722.24	-400,247.53	0.00	2,001.37	

**Total ASF Excess Interest** \$128,686.04

**High Balance** \$373,570.08

**20% of High** \$74,714.02

**ASF Recoupment** \$74,714.02

**Retiree Adjusted**

\*1 The "excess interest" is the difference between: (a) the yearly interest and dividend amounts previously credited to your ASF account; and, (b) the GRS net investment return with a CAP of 7.9% and a floor of 0% as limited by the POA.

ITEM # 2

2015 Afc

CITY OF DETROIT, FINANCE DEPARTMENT, TREASURY DIVISION

STATEMENT OF EARNINGS AND DEDUCTIONS

212172 PAYROLL B FOR 12/07/2015 TO 12/20/2015 PAID 12/23/2015 ST5003729

YOUR SOC. SEC. NO. IS THE NUMBER TO WHICH YOUR DEDUCTIONS ARE POSTED AND SHOULD BE NOTED IN ALL INQUIRIES.

EARNINGS			TAXES, DEDUCTIONS AND REIMBURSEMENTS						YEAR TO DATE	
EMPLOYEE NAME	BANK	ACCOUNT	WEEK							
MARKOSE, RAJU	23	3100025908	52							
TIME	UNIT	AMOUNT	TYPE	AMOUNT	YTD	TYPE	AMOUNT	TYPE	AMOUNT	
REGULAR	8000	240000	FICA	00	734700	BENEFIT PLAN	40	DEFERRED PAY PLAN	3148532	
OVERTIME	7130	365700	FEDERAL WITHHELD	108483	676665	LIFE INS.	1168	SURVIVOR BENEFIT CREDIT UNION	100	
SHIFT PREM.	8090	8899	MICHIGAN WITHHELD	25349	458081	RET. DET.	9600		1400	
COLA			DETROIT WITHHELD	7619	138979	BONDS	30012		1600	
PREM	4140	6831	HOSPITAL MEDC	9011	190545		50000		1600	
TOTAL GROSS		621430	TOTAL TAXES, DEDUCTIONS AND REIMBURSEMENTS		211270	AMOUNT OF CHECK		410160		

MAIL CODE 5520 AGENCY 62 UNIT 5520

NOT NEGOTIABLE DETACH AND RETAIN FOR YOUR RECORDS PAYROLL

2014 - Afc

CITY OF DETROIT, FINANCE DEPARTMENT, TREASURY DIVISION

STATEMENT OF EARNINGS AND DEDUCTIONS

212172 PAYROLL B FOR 12/08/2014 TO 12/21/2014 PAID 12/26/2014 ST5003264

YOUR SOC. SEC. NO. IS THE NUMBER TO WHICH YOUR DEDUCTIONS ARE POSTED AND SHOULD BE NOTED IN ALL INQUIRIES.

EARNINGS			TAXES, DEDUCTIONS AND REIMBURSEMENTS						YEAR TO DATE	
EMPLOYEE NAME	BANK	ACCOUNT	WEEK							
MARKOSE, RAJU	23	3100025908	52							
TIME	UNIT	AMOUNT	TYPE	AMOUNT	YTD	TYPE	AMOUNT	TYPE	AMOUNT	
REGULAR	7070	212100	FICA	00	725400	BENEFIT PLAN	40	DEFERRED PAY PLAN	12990895	
OVERTIME	3490	160200	FEDERAL WITHHELD	48024	508681	LIFE INS.	987	SURVIVOR BENEFIT CREDIT UNION	100	
SHIFT PREM.	5740	6314	MICHIGAN WITHHELD	14955	490418	RET. DET.	9600		7800	
COLA			DETROIT WITHHELD	4562	148317	BONDS	30012		1390	
COMP	130	3900	HOSPITAL MEDC	5973	188355		50000		1390	
FUNR	800	24000							61300	
PREM	3250	5363							70400	
TOTAL GROSS		411877	TOTAL TAXES, DEDUCTIONS AND REIMBURSEMENTS		169141	AMOUNT OF CHECK		242736		

MAIL CODE 5520 AGENCY 62 UNIT 5520

NOT NEGOTIABLE DETACH AND RETAIN FOR YOUR RECORDS PAYROLL

ITEM # 3

Retirement Systems City of Detroit

2/16/16 8:07 am

2013-2014 Fiscal Year Annuity Summary Report

MARKOSE,RAJU

Pension Number 212172

<u>Revenue Group</u>	Water	<u>Payroll Status</u>	Active	<u>Annuity Status</u>	Active
<u>Vested?</u>	No	<u>Birth Date</u>	11/25/1954	<u>Start Date</u>	03/17/1986
<u>Address</u>	16929 RYAN LIVONIA, MI 48154				

CONTRIBUTIONS

INTEREST

ADJUSTMENTS

<u>Up To 8/1982</u>	\$0.00	<u>Up To 1962</u>		<u>Pre-Tax</u>	\$0.00
<u>Pre-Tax 87-Last</u>	\$0.00	<u>Up To 1967</u>		<u>Post-Tax</u>	\$0.00
<u>Post-Tax 82-Last</u>	\$1,981.59	<u>Up To 1970</u>	\$0.00	<u>Interest</u>	\$0.00
<u>Up To Last Year</u>	\$1,981.59	<u>70/71 To Last</u>	\$19.78	<u>Total Adjustments</u>	\$0.00
		<u>Up To Last Year</u>	\$19.78	<u>Total Last Year</u>	\$2,001.37

CURRENT FISCAL YEAR AMOUNTS

Last Annuity Date 06/27/2014

<u>Pre-Tax Contribution</u>	\$0.00	<u>Interest</u>	\$0.00	<u>Net Total Annuity</u>	\$10,172.16
<u>Post-Tax Contribution</u>	\$8,170.79	<u>Fiscal Total</u>	\$8,170.79		
<u>Total Contribution</u>	\$8,170.79				

**Retirement Systems City of Detroit**

**2014-2015 Fiscal Year Annuity Summary Report**

2/16/16 8:07 am

MARKOSE,RAJU

Pension Number 212172

<u>Revenue Group</u>	Water	<u>Payroll Status</u>	Active	<u>Annuity Status</u>	Active
<u>Vested?</u>	No	<u>Birth Date</u>	11/25/1954	<u>Start Date</u>	03/17/1986
<u>Address</u>	16929 RYAN LIVONIA, MI 48154				

CONTRIBUTIONS

INTEREST

ADJUSTMENTS

<u>Up To 8/1982</u>	\$0.00	<u>Up To 1962</u>		<u>Pre-Tax</u>	\$0.00
<u>Pre-Tax 87-Last</u>	\$0.00	<u>Up To 1967</u>		<u>Post-Tax</u>	(\$10,854.02)
<u>Post-Tax 82-Last</u>	\$10,152.38	<u>Up To 1970</u>	\$0.00	<u>Interest</u>	(\$324.88)
<u>Up To Last Year</u>	\$10,152.38	<u>70/71 To Last</u>	\$19.78	<u>Total Adjustments</u>	(\$11,178.90)
		<u>Up To Last Year</u>	\$19.78	<u>Total Last Year</u>	\$10,172.16

CURRENT FISCAL YEAR AMOUNTS

Last Annuity Date 06/26/2015

<u>Pre-Tax Contribution</u>	\$0.00	<u>Interest</u>	\$305.10	<u>Net Total Annuity</u>	\$0.00
<u>Post-Tax Contribution</u>	\$701.64	<u>Fiscal Total</u>	\$1,006.74		
<u>Total Contribution</u>	\$701.64				

EXHIBIT 3

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT of MICHIGAN

FILED

Name of Debtor: City of Detroit, Michigan

Case Number: 13-53846

FEB 19 2014

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:

Robert A. Lukasik
15511 McGuire Street
Taylor MI 48180

Telephone number: 313 627 1127 email: crazybob@wowway.com

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

Robert A. Lukasik
15511 McGuire St.
Taylor MI 48180

Telephone number: email:

US Bankruptcy Court
Eastern District of Michigan
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 particulars.

Court Claim Number: (If known)

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 giving particulars.

RECEIVED

1. Amount of Claim as of Date Case Filed: \$ 32,218.92

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: services performed

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:

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 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: Robert A. Lukasik
Title: Foreman
Company: City of Detroit water/sewerage dept
Address and telephone number (if different from notice address above):

Robert A. Lukasik
(Signature)

2-19-2014
(Date)

15511 McGuire St. Taylor MI 48180
313 627 1127 crazybob@wowway.com

Telephone number: 13-53846-tjt Filed 03/25/16 Entered 03/25/16 16:07:04 Page 17 of 19



EXHIBIT 4

March 11, 2016

ROBERT A. LUKASIK  
15511 Mc Guire Street  
Taylor, MI 48180

FILED  
2016 MAR 23 11 AM 17  
U.S. BANKRUPTCY COURT  
E.D. MICHIGAN DETROIT

MARC N. SWANSON  
ATTN: PERSON IN CHARGE OF RESPONSES TO City of Detroit Bankruptcy Case no. 13-53846

Mailers that were sent to persons affected  
Miller, Canfield, Paddock and Stone, PLC  
150 West Jefferson, Suite 2500  
Detroit, MI 48226

CLERK OF THE COURT ✓  
UNITED STATES BANKRUPTCY COURT  
211 W. Fort Street, Suite 2100  
Detroit, MI 48226

To Whom It May Concern:

Please be advised that I am in receipt of the information regarding "Debtor's Thirty-Third Omnibus Objection to Certain Claims" and how it affects monies still owing to me.

I Do Oppose the objection to my claim. A copy of this letter will be sent to the Clerk of the Court, US Bankruptcy Court, and I will be attending the court date of March 30, 2016 at 1:30, unless a notice of excused attendance is sent to me by the attorney.

Thank you,

x *Robert A. Lukasik*