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**THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

In re:  
  
CITY OF DETROIT, MICHIGAN,  
  
Debtor.  
  
CITY OF DETROIT, MICHIGAN,  
  
Plaintiff,  
  
- against -  
  
SAFECO INSURANCE COMPANY  
OF AMERICA,  
  
Defendant.

Chapter 9 Proceeding  
  
Case No.: 13-53846  
  
Hon. Thomas J. Tucker

**SAFECO’S RESPONSE TO CITY OF DETROIT’S STATUS REPORT WITH  
REGARD TO PREFERENCE ACTIONS**

Safeco Insurance Company, through undersigned counsel, responds to the Status Report submitted by the City of Detroit on April 29, 2016. (Doc. 11137). In its status report, the City touts its settlement of preference actions and requests that the terms and conditions of the Procedures Order (Doc. 10280) should not be changed. They City’s request, however, effectively prevents any of the remaining preference defendants from defending themselves by conducting discovery. In Safeco’s case, this prohibition is especially problematic because the City has failed to respond to Safeco’s informal discovery requests.

