

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE:

Chapter 9

Case No. 13-53846

City of Detroit, Michigan,

Debtor.

**MOTION FOR EXPEDITED HEARING
ON INTERESTED PARTY JEROME MOORE'S
MOTION FOR RELIEF FROM AUTOMATIC STAY [DOCKET 1307]**

Now comes Interested Party Jerome Moore and hereby moves the Court, pursuant to Rules 9006(c)(1) and 9007 of the Federal Rules of Bankruptcy Procedure and Rule 9006-1(b) of the Local Rules of the Bankruptcy Court for the Eastern District of Michigan, for the entry of an *ex parte* order scheduling an expedited hearing on his Motion for Relief from Automatic Stay [docket no. 1307]. In support of his Motion, Interested Party Jerome Moore states as follows:

1. On October 22, 2013, Interested Party Jerome Moore filed a Motion for Relief from the Automatic Stay for the limited purpose of allowing the City of Detroit to participate in Oral Argument in Mr. Moore's appeal in front of the Michigan Court of Appeals No. 310920, scheduled to be heard on November 13, 2013, and to allow for the Court of Appeals to render its decision on the Appeal. [Docket 1307]
2. In order to assure adequate time for the Michigan Court of Appeals to be apprised of City of Detroit's participation in oral argument and for the City of Detroit to prepare, Interested Party Jerome Moore is requesting an expedited hearing on his motion for limited relief from the automatic stay to be heard on or before November 6, 2013.

3. If the Appeal is granted and the case is remanded for further proceedings to Wayne County Circuit Court, any further adjudication relative to the City of Detroit shall be subject to the automatic stay and to the jurisdiction of the Bankruptcy Court.

WHEREFORE: Interested Party Jerome Moore respectfully requests that his ex parte Motion for Expedited Hearing on his Motion for Limited Relief from the Automatic Stay [Docket 1307] be granted and the expedited hearing on the Motion for Limited Relief from the Automatic Stay be scheduled for November 6, 2013, 9:00 a.m., or at a sooner date to be set by the Court and at a time to be set by the Court. A proposed order is attached to this motion as Exhibit 1.

Respectfully submitted,

JEROME D. GOLDBERG, PLLC

By: /s/ Jerome D. Goldberg
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DATED: October 23, 2013

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE:

Chapter 9

Case No. 13-53846

City of Detroit, Michigan,

Debtor.

**ORDER GRANTING EXPEDITED HEARING
ON INTERESTED PARTY JEROME MOORE'S
MOTION FOR RELIEF FROM AUTOMATIC STAY**

The *ex parte* Motion of Jerome Moore for Expedited Hearing on his Motion for Relief from the Automatic Stay [docket no. 1307], having come before this Court and the Court being otherwise fully advised in the premises; noting especially:

4. Interested Party Jerome Moore has filed a Motion for Relief from the Automatic Stay for the limited purpose of allowing the City of Detroit to participate in Oral Argument in Mr. Moore's appeal, Michigan Court of Appeals No. 310-920, scheduled to be heard on November 13, 2013, and to allow for the Court of Appeals to render its decision on the Appeal.
5. If the Appeal is granted and the case is remanded for further proceedings to Wayne County Circuit Court, any further adjudication relative to the City of Detroit shall be subject to the automatic stay and to the jurisdiction of the Bankruptcy Court.
6. In order to assure adequate time for the Michigan Court of Appeals to be apprised of the City of Detroit's participation in oral argument and for the City of Detroit to prepare, Interested Party Jerome Moore has requested an expedited hearing on his motion for limited relief from the automatic stay on or before November 6, 2013.

IT IS ORDERED:

1. The Motion is Granted.
2. The Court shall conduct a hearing on Interested Party Jerome Moore's Motion for Relief from the Automatic Stay at _____ .m., on _____, 2013, in Courtroom _____ at the United States District Court for the Eastern District of Michigan, Southern Division, 231 W. Lafayette Street, Detroit, Michigan 48226.
3. Interested Party Jerome Moore shall serve a copy of this order on attorneys for City of Detroit by electronic service upon issuance of this order and on Jason McFarlane, City of Detroit Law Department, 2 Woodward Avenue, Suite 500, Detroit, MI 48226, attorney for Appellee City of Detroit, and Deborah Brouwer, 200 Talon Center Drive, Suite 200, Detroit, MI 48207, attorney for Appellee SEMHA, by personal service within two days of issuance of this order.