

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

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In re : Chapter 9
CITY OF DETROIT, MICHIGAN, : Case No. 13-53846
Debtor. : Hon. Steven W. Rhodes
-----X

**EX PARTE MOTION OF THE CITY OF DETROIT
FOR ENTRY OF AN ORDER AUTHORIZING
IT TO FILE A REPLY IN EXCESS OF PAGE LIMIT**

The City of Detroit, Michigan (the "City"), as the debtor in the above-captioned case, hereby moves the Court for the entry of an order authorizing the City to file its Consolidated Reply to Certain Objections to Confirmation of Fourth Amended Plan for the Adjustment of Debts of the City of Detroit (the "Reply") in excess of the 30-page limit imposed by the Court's Order Establishing Motion Procedure (Docket No. 283) (the "Motion Procedure Order").

1. The City filed the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit (Docket No. 4392) (the "Plan") on May 5, 2014.
2. As of the date of this filing, the City has received more than 500 objections to the Plan (and previously-filed versions thereof), many of which raise multiple legal issues. Several of the Objections exceed 50 pages in length.

Collectively, the Objections raise numerous legal and factual issues that are unique to this case and that are unprecedented in the chapter 9 context.

3. Paragraph 3 of the Motion Procedure Order provides that, "[n]otwithstanding LBR 9014-1(e), a reply brief filed by the City shall not exceed 30 pages." This paragraph further provides, however, that "[t]he City may file a motion to extend this page limit for cause shown."

4. The City submits that it requires more than 30 pages to meaningfully address the myriad issues raised in the Objections. Accordingly, the City respectfully requests that it be (a) granted relief from the page limit for reply briefs imposed by paragraph 3 of the Motion Procedure Order and (b) permitted to file its Reply in excess of 30 pages in length.

WHEREFORE, the City respectfully requests that this Court: (i) enter an order substantially in the form attached hereto as Exhibit 1, granting the relief sought herein; and (ii) grant such other and further relief to the City as the Court may deem proper.

Dated: May 23, 2014

Respectfully submitted,

/s/ Heather Lennox

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ATTORNEYS FOR THE DEBTOR

SUMMARY OF ATTACHMENTS

The following documents are attached to this Motion, labeled in accordance with Local Rule 9014-1(b).

Exhibit 1	Proposed Form of Order
Exhibit 2	None [Motion Seeks <i>Ex Parte</i> Relief]
Exhibit 3	None [Brief Not Required]
Exhibit 4	None [Separate Certificate of Service To Be Filed]
Exhibit 5	None [No Affidavits Filed Specific to This Motion]
Exhibit 6	None [No Documentary Exhibits Filed Specific to this Motion]

EXHIBIT 1

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**EX PARTE ORDER AUTHORIZING THE CITY OF
DETROIT TO FILE A REPLY IN EXCESS OF PAGE LIMIT**

This matter coming before the Court on the *Ex Parte* Motion of the City of Detroit for Entry of an Order Authorizing it to File a Reply in Excess of Page Limit (the "Motion"),¹ filed by the City of Detroit, Michigan (the "City"); and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.

¹ Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

2. The City is granted relief from the page limit for reply briefs set forth in paragraph 3 of the Motion Procedure Order and may file its Reply in excess of 30 pages.