

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

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	:	<b>Chapter 9</b>
<b>In re:</b>	:	<b>Case No. 13-53846</b>
<b>CITY OF DETROIT, MICHIGAN,</b>	:	<b>Hon. Steven W. Rhodes</b>
Debtor.	:	
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**PETITIONERS ROBERT DAVIS' AND CITIZENS UNITED AGAINST CORRUPT  
GOVERNMENT'S MOTION FOR AN *EX PARTE* ORDER TO REDUCE THE TIME  
FOR A PARTY TO TAKE ANY ACTION OR FILE ANY OBJECTIONS TO  
PETITIONER ROBERT DAVIS' AND CITIZENS UNITED AGAINST CORRUPT  
GOVERNMENT'S EMERGENCY MOTION FOR CLARIFICATION OF THE  
COURT'S JULY 25, 2013 STAY ORDER**

PETITIONERS, Robert Davis and Citizens United Against Corrupt Government, by and through their attorney, Andrew A. Paterson, submits this, their Motion for an *Ex Parte* Order Reducing the Time for A Party To Take Any Action or File Any Objections to Petitioners Robert Davis' and Citizens United Against Corrupt Government's Emergency Motion for Clarification of the Court's July 25, 2013 Stay Order and states as follows:

1. Pursuant to LBR 9006-1(b), Petitioners Robert Davis and Citizens United Against Corrupt Government (“**Petitioners**”) respectfully request the Court to enter an *ex parte* order reducing the time for a party to take any action or file any objections to Petitioners' Emergency Motion for Clarification of the Court's July 25, 2014 Stay Order (“**Emergency Motion**”).
2. In accordance with LBR 9006-1(b), on September 19, 2013 Petitioners' legal counsel contacted Jim Nosedá, Assistant City Attorney for the City of Detroit, via email and

- telephone, and sought to obtain his acquiescence with this motion and an accelerated response time if he did not concur. Mr. Noseda denied Petitioners' counsel's request.
3. It is imperative and urgent for the Court to address the merits of Petitioners' Emergency Motion for Clarification of the Court's July 25, 2013 Stay Order, because Wayne County Circuit Court Judge, Lita M. Popke, has entered a show cause order requiring Saunteel Jenkins, President of the Detroit City Council, to show cause as to why she should not be removed from her position as the "appointed" city council president under quo warranto proceedings and has set a response time and a hearing date for **September 26, 2013**.
  4. On, September 19, 2013, Mr. Noseda filed a Notice with the Wayne County Circuit Court suggesting that this Court's July 25, 2013 Stay Order may apply to Petitioners' Application for Writ of Quo Warranto against Saunteel Jenkins seeking her removal as the "appointed" city council president for the City of Detroit.
  5. Accordingly, Petitioners respectfully request that the Court reduces the time for a party to take action or object to Petitioners' Emergency Motion to three (3) business days.

### **CONCLUSION/PRAAYER FOR RELIEF**

Petitioners, Robert Davis and Citizens United Against Corrupt Government, pray that the Court enters an *ex parte* order reducing the time for a party to take action or object to Petitioners' Emergency Motion to 3 business days.

Respectfully submitted,

/S/ Andrew A. Paterson  
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DATED; September 19, 2013