

EXHIBIT 2

Notice of Motion and Opportunity to Object

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

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

**NOTICE OF THE OFFICIAL COMMITTEE OF RETIREE’S MOTION
IN LIMINE TO EXCLUDE OPINIONS OR CONCLUSIONS AS TO THE
CITY OF DETROIT, MICHIGAN’S UNDERFUNDING OF PENSION LIABILITY**

PLEASE TAKE NOTICE that on October 21, 2013, the Official Committee of Retirees, filed its *Motion in Limine to Exclude Opinions or Conclusions As to the City of Detroit, Michigan’s Underfunding of Pension Liability* (the “*Motion in Limine*”) in the United States Bankruptcy Court for the Eastern District of Michigan (the “Bankruptcy Court”) seeking entry of an order excluding Charles Moore or any other individual designated by the City of Detroit, Michigan (the “City”) from offering opinions or conclusions as to the City’s underfunding of pension liabilities at the Eligibility hearing, set to commence in the Bankruptcy Court on October 23, 2013.

PLEASE TAKE FURTHER NOTICE that **your rights may be affected** by the relief sought in the *Motion in Limine*. **You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.**

PLEASE TAKE FURTHER NOTICE that if you do not want the Bankruptcy Court to grant the Official Committee of Retiree’s *Motion in Limine*, or you want the Bankruptcy Court to consider your views on the *Motion in Limine*, by **October 22, 2013 at 4:00 p.m. (EDT)** you or your attorney must:

1. File a written objection or response to the *Motion in Limine* explaining your position with the Bankruptcy Court electronically through the Bankruptcy Court’s electronic case filing system in accordance with the Local Rules of the Bankruptcy Court.
2. If an objection or response is timely filed and served, the clerk will schedule a

hearing on the Motion *in Limine* and you will be served with a notice of the date, time and location of the hearing.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take steps, the court may decide that you do not oppose the relief sought in the *Motion in Limine* and may enter an order granting such relief.

Dated: October 21, 2013

Carole Neville
DENTONS US LLP
1221 Avenue of the Americas
New York, New York 10020
Tel: (212) 768-6700
Fax: (212) 768-6800
carole.neville@dentons.com

Sam J. Alberts
DENTONS US LLP
1301 K. Street, NW
Suite 600, East Tower
Washington, DC 2005-3364
Tel: (202) 408-6400
Fax: (202) 408-6399
sam.alberts@dentons.com

By: /s/ Claude D. Montgomery
Claude D. Montgomery (P29212)
DENTONS US LLP
1221 Avenue of the Americas
New York, New York 10020
Tel: (212) 768-6700
Fax: (212) 768-6800
claudemontgomery@dentons.com

Matthew E. Wilkins (P56697)
Paula A. Hall (P61101)
BROOKS WILKINS SHARKEY & TURCO PLLC
401 South Old Woodward, Suite 400
Birmingham, Michigan 48009
Direct: (248) 971-1711
Cell: (248) 882-8496
Fax: (248) 971-1801
wilkins@bwst-law.com
hal@bwst-law.com

Counsel for the Official Committee of Retirees