

# MILLER CANFIELD

MARC N. SWANSON  
TEL (313) 496-7591  
FAX (313) 496-8451  
E-MAIL swansonm@millercanfield.com

Miller, Canfield, Paddock and Stone, P.L.C.  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226  
TEL (313) 963-6420  
FAX (313) 496-7500  
www.millercanfield.com

MICHIGAN: Ann Arbor  
Detroit • Grand Rapids  
Kalamazoo • Lansing • Troy

FLORIDA: Tampa

ILLINOIS: Chicago

NEW YORK: New York

OHIO: Cincinnati

CANADA: Windsor

CHINA: Shanghai

MEXICO: Monterrey

POLAND: Gdynia

Warsaw • Wrocław

February 4, 2016

The Honorable Thomas J. Tucker  
US Bankruptcy Court  
211 West Fort Street  
Detroit, Michigan 48226

Re: *City of Detroit, Michigan*, Case No. 13-53846

Dear Judge Tucker:

As you may recall, our firm represents the City of Detroit, Michigan in its bankruptcy case. The law firm, Clark Hill PLC (“Clark Hill”), represents the Police and Fire Retirement Systems of the City of Detroit, the General Retirement System of the City of Detroit, the Detroit Wayne Joint Building Authority and Sky Group Grand, LLC in this bankruptcy case.

We are writing, to inform you, as required by MRPC 1.10(b), that James M. Crowley, Esq. and Alan D. Szuma, Esq. have accepted offers of employment to join our firm. Mssrs. Crowley and Szuma practice and practiced, respectively with Clark Hill, in its Birmingham, Michigan office. MRPC 1.10 states:

(a) ... If a lawyer leaves a firm and becomes associated with another firm, MRPC 1.10(b) governs whether the new firm is imputedly disqualified because of the newly hired lawyer’s prior services in association with the lawyer’s former law firm.

(b) When a lawyer becomes associated with a firm, the firm may not knowingly represent a person in the same or a substantially related matter in which a lawyer, or a firm with which that lawyer was associated, is disqualified under Rule 1.9(b), unless:

- (1) the disqualified lawyer is screened from any participation in the matter and is apportioned no part of the fee therefrom; and
- (2) written notice is promptly given to the appropriate tribunal to enable it to ascertain compliance with the provisions of this rule.

While neither Mssrs. Crowley nor Szuma believe that they were involved in, or gained any information related to, these matters while at the Clark Hill firm, we have taken the

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

-2-

February 4, 2016

precaution to screen them from any contact or involvement with our representation of our client in the above matter and to prevent them from being apportioned any part of our fee. Likewise, we are taking the precaution of informing you of our hiring of Mssrs. Crowley and Szuma and of our screening of them. Please feel free to contact me if you have any questions or comments regarding this matter.

Very truly yours,

Miller, Canfield, Paddock and Stone, P.L.C.

By: \_\_\_\_\_

Marc N. Swanson

cc: Jonathan S. Green, Esq.  
Michael Hartman, Esq.