UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846 Judge Thomas J. Tucker

Chapter 9

GENERAL RETIREMENT SYSTEM FOR THE CITY OF DETROIT AND BOARD OF TRUSTESS FOR THE GENERAL RETITEMENT SYSTEM'S RESPONSE TO THE CITY OF DETROIT'S MOTION FOR THE ENTRY OF AN ORDER ENFORCING THE CONFIRMATION ORDER AND THE CITY'S CONFIRMED PLAN AGAINST LORENZO RIPPY

The General Retirement System for the City of Detroit ("GRS"), and the Board of Trustees for the General Retirement System ("Board") by its undersigned counsel, VanOverbeke, Michaud, Timmony, P.C., file this *Response to the Motion for the Entry of an Order Enforcing the Confirmation Order and the City's Confirmed Plan Against Lorenzo Rippy* ("<u>Response</u>"). In support of this Response, GRS and the Board, respectfully state as follows:

1. The GRS and the Board have reviewed the *City of Detroit's Motion for the Entry of an Order Enforcing the Confirmation Order and the City's Confirmed Plan Against Lorenzo Rippy* (the "Motion") and concur with the relief requested therein.

2. The GRS and the Board agree that this Court retains jurisdiction over the subject matter of the Motion pursuant to the confirmed Eight Amended Plan for



the Adjustment of Debts of the City of Detroit (the "Plan"), which was confirmed by this Court and is binding on all parties.

3. The Plan provides that this Court retains jurisdiction to interpret, implement, and enforce the provisions of the Plan and resolve any disputes arising in connection with the Plan or its implementation, which includes matters that may be governed by contested matter procedures under FRBP 9014.

4. The GRS and the Board agree that Lorenzo Rippy violated the Plan injunction and the November 12, 2014 Confirmation Order by filing his Lawsuit in the Wayne County Circuit Court.

5. Because the issues raised in the Motion arise in connection with and under the terms of the confirmed Plan, jurisdiction appropriately lies with this Court, and entry of the City of Detroit's proposed order is proper.

6. Accordingly, the GRS and the Board concur in the relief requested in the Motion and respectfully requests that the Court grant the same.

WHEREFORE, GRS and the Board respectfully request that this Honorable Court enter an order granting the relief requested in the Motion and such other and further relief as is just and proper. Dated: June 25, 2025

VANOVERBEKE, MICHAUD, & TIMMONY, P.C. By: /s/ Angelica Brown Angelica Brown (P87542) /s/ Michael J. VanOverbeke Michael J. VanOverbeke (P42641) /s/ Francis E. Judd Francis E. Judd (P68857) Counsel for the General Retirement System for the City of Detroit (Creditor) and Board of Trustees of the General **Retirement System** 79 Alfred Street Detroit, Michigan 48201 (313) 578-1200 abrown@vmtlaw.com mvanoverbeke@vmtlaw.com fjudd@vmtlaw.com

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846 Judge Thomas J. Tucker Chapter 9

EXHIBIT LIST

Exhibit 1 Certificate of Service

EXHIBIT 1 – CERTIFICATE OF SERVICE

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846 Judge Thomas J. Tucker Chapter 9

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 25, 2025, I served a copy of the

foregoing Response to the City of Detroit's Motion for the Entry of an Order

Enforcing the Confirmation Order and the City's Confirmed Plan Against Lorenzo

Rippy upon counsel for Lorenzo Rippy via first class mail and email at the address

below:

Arlene F. Woods 2000 Town Center, Ste. 1900 Southfield, Michigan 48075 <u>arlenep40039@aol.com</u> Dated: June 25, 2025

VANOVERBEKE, MICHAUD, & TIMMONY, P.C. By: /s/ Angelica Brown Angelica Brown (P87542) /s/ Michael J. VanOverbeke Michael J. VanOverbeke (P42641) /s/ Francis E. Judd Francis E. Judd (P68857) Counsel for the General Retirement System for the City of Detroit (Creditor) and Board of Trustees of the General **Retirement System** 79 Alfred Street Detroit, Michigan 48201 (313) 578-1200 abrown@vmtlaw.com mvanoverbeke@vmtlaw.com fjudd@vmtlaw.com