## 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

## CITY OF DETROIT'S EX PARTE MOTION FOR AN ORDER APPROVING ITS MODIFIED PROCEDURES FOR DISTRIBUTION OF NEW B NOTES TO HOLDERS OF ALLOWED CLASS 14 CLAIMS UNDER THE CITY'S PLAN OF ADJUSTMENT

The City of Detroit ("City"), by its undersigned counsel, moves the Court on an ex parte basis for an order approving its modified procedures for Distribution of New B Notes to holders of Allowed Class 14 Claims ("Motion"). Over three years have now passed since the current procedures were first established for the Distribution of New B Notes to the holders of Allowed Class 14 Claims. Much of that time and the consequent delay was spent in litigation with Richard Wershe, Jr.<sup>1</sup> Although that litigation has finally concluded, the resultant delay has caused problems for Claimholders. For example, some Claimholders have reported that the brokerage accounts they were required to open under the current procedures in order to receive Distribution of their New B Notes have since been involuntarily closed by their brokerage houses due to the lengthy inactivity in those accounts. This is just one example.

- 1 -

<sup>&</sup>lt;sup>1</sup> Mr. Wershe asserted a Claim in the amount of \$100,000,000. Doc. No. 13560-1.

In order to address this and other issues that resulted from the unavoidable delay in Distribution, the City seeks approval of certain minor modifications to the procedures it and the Court previously established. This relief would give the City additional flexibility in the Distribution process so that the City could ensure that as many Claimholders as possible receive their New B Notes under the Plan.

#### I. <u>BACKGROUND</u>

The City's Plan<sup>2</sup> states that each holder of an Allowed Class 14 Claim is to receive a Pro Rata Distribution of New B Notes, plus any accrued interest. Previously, the City moved for,<sup>3</sup> and this Court established by order,<sup>4</sup> procedures for gathering the tax and account information necessary for the City to distribute "New B Notes" to Claimholders (defined below) under the Plan. The City followed these procedures and gathered the needed information to make a Distribution of New B Notes to Claimholders. No changes are proposed to the Brokerage Order.

\_

<sup>&</sup>lt;sup>2</sup> Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (October 22, 2014), filed on October 22, 2014 [Doc. No. 8045], and confirmed as modified on November 12, 2014 [Doc. No. 8272] ("Plan"). Undefined capitalized terms used in this Motion have the meanings assigned to them in the Plan or the Brokerage Motion (defined below), as applicable.

<sup>&</sup>lt;sup>3</sup> City of Detroit's Motion to Implement Distributions of B Notes to Holders of Allowed Class 14 Claims Under the City's Confirmed Plan of Adjustment ("Brokerage Motion," Doc. No. 13126).

<sup>&</sup>lt;sup>4</sup> Order Granting the City of Detroit's Motion to Implement Distributions of B Notes to Holders of Allowed Class 14 Claims Under the City's Confirmed Plan of Adjustment ("Brokerage Order," Doc. No. 13173).

The City also previously moved for,<sup>5</sup> and this Court established by order,<sup>6</sup> procedures for Distribution of New B Notes to Claimholders. An overview of these procedures, along with their status, is as follows:

- 1. The City files a Distribution Date Notice with the Court (completed, *see* Doc. No. 13964).
- 2. The City directs the Disbursing Agent to transfer B Notes to Claimholders (also completed).
- 3. The Disbursing Agent informs the City as to which transfers were unsuccessful and, if known, the reason for the failure (ongoing).
- 4. The City sends Distribution Failure Notices, in the form attached as Exhibit 6 to the Procedures Motion, to each Claimholder with a failed transfer, providing each Claimholder with an opportunity to correct the issues that caused the transfer to fail.
- 5. At least 30 days after sending a Distribution Failure Notice, the City directs the Disbursing Agent to retry the transfers to Claimholders whose initial transfers failed, using new account information if provided. If the second transfer attempt to a Claimholder also fails, then the Distribution to that Claimholder is deemed "Undeliverable or Unclaimed" as defined in Article V.I.4 of the Plan and forfeited to the City. The amount forfeited in such instance includes both the New B Notes and the Related Income (*i.e.*, the accrued interest on the underlying New B Notes).

<sup>&</sup>lt;sup>5</sup> City of Detroit's Motion to Establish Procedures for Distributions of New B Notes to Holders of Allowed Class 14 Claims Under the City's Confirmed Plan of Adjustment ("Procedures Motion," Doc. No. 13476).

<sup>&</sup>lt;sup>6</sup> Order Granting the City of Detroit's Motion to Establish Procedures for Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment ("Procedures Order," Doc. No. 13488).

#### II. RELIEF REQUESTED

The procedures did not contemplate such a long delay between their approval and the filing of the Distribution Date Notice. Unfortunately, without the requested relief in this Motion, the delay caused by Mr. Wershe's litigation could result in some Claimholders with smaller claims not receiving their New B Notes simply because of the passage of time through no fault of their own. Although the forfeiture of these New B Notes would inure to the City's benefit under the Plan and the current procedures in the Procedures Order, the City does not believe that this result is fair or in keeping with the intent or spirit of the Plan.

Indeed, although the overwhelming majority of the New B Notes were transferred successfully (because many of the larger transfers were successful), many attempted transfers to Claimholders with smaller claims were not. The Disbursing Agent reports that as of July 8, 2025, approximately 92% of the New B

Notes were successfully transferred, but these successful transfers only represent 44% of the Claimholders by number. Approximately 28% of the attempted transfers failed, representing approximately 4% of the dollar value of the New B Notes to be transferred.<sup>7</sup>

Accordingly, the City seeks the Court's approval to make minor modifications to the current procedures in the Procedures Order to accomplish the following:

- 1. The City desires the authority, but not the obligation, to send additional notices and make additional attempts after the two failed attempts permitted under the Procedures Order to transfer New B Notes to Claimholders where it believes that a Claimholder is making good faith efforts to correct whatever issues may be causing New B Note transfers to that Claimholder to fail. For example, if a Claimholder opens a new brokerage account but has a typographical error on the Brokerage Form which causes the transfer to fail twice, the City would like the authority to continue to work with the Claimholder to correct the issue and make an additional attempt (or attempts) to transfer New B Notes to that Claimholder.
- 2. The City also desires the authority, but not the obligation, to distribute Related Income to a Class 14 Claimholder even if two or more attempts at distributing New B Notes to that Claimholder have failed in cases where the City is reasonably confident that it can distribute the Related Income to that Claimholder, even if the City is unable to transfer the underlying New B Notes to the Claimholder.
- 3. The City would like the ability to adjust the wording of the Distribution Failure Notice to reflect these changes on a case-by-case basis.

These proposed changes to the New B Note Distribution procedures do not negatively affect any holder of Allowed Class 14 Claims or any other City creditor.

<sup>&</sup>lt;sup>7</sup> The rest remain "pending," *i.e.*, their success or failure is not yet known.

Indeed, if the relief requested in the Motion is not granted, the New B Notes and Related Income will be forfeited to the City under the current Procedures Order. The New B Notes and Related Income will not be distributed or reallocated to other holders of Allowed Class 14 Claims or distributed to any other creditor under the Plan. Simply put, the only person or entity negatively affected or disadvantaged by the requested relief will be the City itself. For this reason, the City seeks this relief on an *ex parte* basis.

Importantly, the City also believes that modifying the procedures in the current Procedures Order to allow for additional transfer attempts will not adversely affect its goal of completing all transfers of New B Notes and closing this bankruptcy case this calendar year. It will not result in further delay.

The City suggests that the simplest method for granting the relief sought in this Motion is to enter an order that replaces and supersedes the Procedures Order in its entirety. The City's proposed order is attached as **Exhibit 1**, and a redline to the Procedures Order is attached as **Exhibit 2**.

#### III. NOTICE

The City filed this Motion using the Court's electronic filing system, which sends notice of the filing to all ECF participants registered to receive notice in this case. Beyond that, no additional notice has or will be provided given the *ex parte* nature of the Motion. For the reasons asserted in this Motion, the City respectfully submits that no other or further notice of this Motion need be given.

## IV. <u>CONCLUSION</u>

WHEREFORE, the City respectfully requests that this Court grant the relief requested in this Motion, by entering an Order, substantially in the form attached as **Exhibit 1**, and granting such other and further relief as this Court may deem just and proper.

Dated: July 13, 2025

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

By: /s/ Marc N. Swanson

Marc N. Swanson (P71149)
Ronald A. Spinner (P73198)
150 West Jefferson, Suite 2500
Detroit, Michigan 48226
Phone - (313) 496-6420
Facsimile - (313) 496-8451
Email - swansonm@millercanfield.com

Counsel for the City of Detroit, Michigan

# **EXHIBIT LIST**

Exhibit 1 Proposed Order

Exhibit 2 Redline Comparison to Procedures Order

# **EXHIBIT 1**

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

In re:	Case No. 13-53846
City of Detroit, Michigan,	Judge Thomas J. Tucker
Debtor.	Chapter 9

# ORDER GRANTING CITY OF DETROIT'S EX PARTE MOTION FOR AN ORDER APPROVING MODIFIED PROCEDURES FOR DISTRIBUTION OF NEW B NOTES TO HOLDERS OF ALLOWED CLASS 14 CLAIMS UNDER THE CITY'S PLAN OF ADJUSTMENT

This case is before the Court on the motion entitled "City of Detroit's *Ex*Parte Motion for an Order Approving its Modified Procedures for Distribution of

New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of

Adjustment" (Docket # [\_\_\_\_\_], the "Motion").¹ No further notice being

necessary or required; no hearing being necessary; and, after due deliberation, the

Court finding good and sufficient cause to enter this Order.

#### IT IS ORDERED THAT:

- 1. The Motion is granted.
- The terms of the Court's Procedures Order entered at Docket Number
   13488 are superseded and replaced in their entirety by this Order.

<sup>&</sup>lt;sup>1</sup> Capitalized terms used but not otherwise defined in this Order have the meanings given to them in the Motion or in the Procedures Motion filed at Docket Number 13476, as applicable.

- 3. The form of the Distribution Failure Notice attached to the Procedures Motion is authorized and approved; *provided, however*, that the City may modify the Distribution Failure Notice to allow for one or more additional attempts to Distribute New B Notes to a Claimholder in the City's sole discretion. The City must set the deadline for responding to a Distribution Failure Notice at least 30 days from the date of the mailing of that Distribution Failure Notice.
- 4. The City is authorized to serve, by first-class mail, copies of this Order, the Distribution Failure Notice, a Brokerage Account Form, and a pre-paid return envelope on any Claimholder to whom the Disbursing Agent unsuccessfully attempted to Distribute New B Notes. After two unsuccessful attempts have been made by the City to Distribute New B Notes to a Claimholder, the City may, but is not required to, serve one or more additional Distribution Failure Notices, Brokerage Account Forms, and pre-paid return envelopes on a Claimholder and make additional attempts to Distribute New B Notes to a Claimholder (even if earlier attempts by the Disbursing Agent to Distribute New B Notes to that Claimholder were unsuccessful). Unless a Claimholder has complied with the Plan and the requirements of Federal Rule of Bankruptcy Procedure 3001(e)(2) concerning a transfer of claim (other than for security after a proof of claim has been filed) or properly filed a change of address form, the foregoing documents are to be sent to the name and address for notice identified in the proof of claim.

- 5. If the Distribution of New B Notes to Claimholder WSP Michigan Inc. ("WSP") is unsuccessful, in addition to the notice via first class mail as provided in the preceding paragraph, the City will also provide the notice to WSP by email to Kris.Jacobsen@wsp.com. Notwithstanding the language in paragraph 6 of this Order, if Claimholder WSP chooses to return a new Brokerage Account Form, Claimholder WSP may email the information that it would have provided on a Brokerage Account Form to the City at swansonm@millercanfield.com from the email address Kris.Jacobsen@wsp.com and such information will be treated as if it were contained within a Brokerage Account Form. The emailed information must otherwise comply with the requirements for a Brokerage Account Form as set forth in this Order.
- 6. For Claimholders who elect to return a new Brokerage Account Form, unless the Claimholder has complied with the Plan and the requirements of Federal Rule of Bankruptcy Procedure 3001(e)(2) concerning a transfer of claim (other than for security after a proof of claim has been filed), the name of the creditor on the Brokerage Account Form must match the name of the creditor on the proof of claim form and the Distribution will be made in the name of the creditor on the proof of claim form. If a Claimholder returns a Brokerage Account Form that does not comply with this paragraph of this Order, the City is authorized to disregard the

Brokerage Account Form and rely on Brokerage Account Forms previously submitted by the Claimholder that do comply with this paragraph, if any.

- 7. The City is authorized to make modifications to Distribution Failure Notices and Brokerage Account Forms, both before and after these documents have been filled out, that the City in good faith believes are necessary or appropriate to effectuate the relief provided for by this Order. The City is not required or obligated to accept or take any action on any instructions or information provided by a Claimholder, including instructions or information which may be provided by email, letter, phone call or any other type of oral or written communication, with respect to a Distribution other than a properly completed and timely received Brokerage Account Form.
- 8. If the Disbursing Agent attempts to Distribute New B Notes to a Claimholder after the deadline identified in a Distribution Failure Notice served on that Claimholder has passed, and if that Distribution is not successful, then for that Claimholder, the City may, in its sole discretion, (1) elect to send one or more additional Distribution Failure Notices, Brokerage Account Forms, and pre-paid return envelopes to that Claimholder and make additional attempts to Distribute New B Notes to that Claimholder (without waiving or foregoing the right to exercise the options in clause (2) of this paragraph 8 with respect to any additional attempts to Distribute New B Notes to that Claimholder), or (2) after two failed

attempts to Distribute New B Notes to a Claimholder have been made by the City, determine that the claim is "Undeliverable or Unclaimed" as defined in Article V.I.4 of the Plan, in which case, the City, in its discretion, is authorized to exercise any one or more of the following options:

- a. All Related Income with respect to that Claimholder now owing or which later may come due to such Claimholder, in the discretion of the City, (i) may be Distributed to such Claimholder even if the City is unable to transfer the underlying New B Notes to the Claimholder (in instances where the City, in the City's judgment, is reasonably confident that it can distribute the Related Income to that Claimholder), or (ii) may irrevocably revert to the City, in which case any Claim in respect of such Distributions will be released and forever barred from assertion against the City and its property;
- b. the City is authorized to cancel any New B Notes held for Distribution to that Claimholder, in which case any Claim in respect of those New B Notes will be released and forever barred from assertion against the City and its property, and those New B Notes will be of no further force or effect; and/or
- c. the proof of claim(s) filed by that Claimholder may be disallowed and expunged.
- 9. The City is authorized but not obligated to take any other action necessary or appropriate to further implement the terms of this Order, including, without limitation, to extend a Distribution Failure Notice deadline or make one or more additional attempts to Distribute New B Notes to a Claimholder.
- 10. At the direction of the City, the City's claims agent is authorized and directed to revise the claims register as necessary to effect the terms of this Order

(including, without limitation, to evidence the relief elected by the City in paragraph 8 of this Order with respect to any Claimholder).

- 11. This Order is entered in furtherance of this Court's reserved jurisdiction to enter any orders that may be necessary or appropriate to implement or consummate the provisions of the Plan, and to ensure that Distributions to Claimholders are accomplished in accordance with the provisions of the Plan.
- 12. In implementing and enforcing the terms of this Order and the Plan, the City and its Related Entities are entitled to all privileges and protections of the Plan, including the exculpation set forth in Article III.D.6., in connection herewith and therewith.
- 13. This Order does not modify the Plan or the Confirmation Order. Each and every term and condition in the Plan and Confirmation Order, including, without limitation, those with respect to the Allowed Claims and Distributions, remains in full force and effect. Furthermore, nothing in this Order modifies or amends the Brokerage Order appearing at Docket Number 13173. The Brokerage Order shall remain in full force and effect.
- 14. This Court retains jurisdiction over the interpretation and enforcement of this Order.

# **EXHIBIT 2**

## REDLINE TO PROCEDURES ORDER

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

In re:	Case No. 13-53846
City of Detroit, Michigan,	Judge Thomas J. Tucker
Debtor.	Chapter 9

ORDER GRANTING CITY OF DETROIT'S <u>EX PARTE</u> MOTION <u>TFOR</u>

<u>ESTABLISHAN ORDER APPROVING MODIFIED</u> PROCEDURES FOR

DISTRIBUTION OF NEW B NOTES TO

HOLDERS OF ALLOWED CLASS 14 CLAIMS <u>UNDER THE CITY'S</u>

PLAN OF ADJUSTMENT

This case is before the Court on the motion entitled "City of Detroit's <u>Ex</u>

<u>Parte</u> Motion to <u>Establish for an Order Approving its Modified</u> Procedures for

Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the

City's Plan of Adjustment" (Docket # <u>13476</u> \_\_\_\_\_\_], the "Motion").¹ Notice

having been given by first class mail to all known holders of Class 14 Claims

under the Plan, and no No further notice being necessary or required; only one

Response having been filed² and that Response having been resolved by

agreement in accord with the stipulation filed on December 22, 2021 (Docket #

<sup>&</sup>lt;sup>1</sup> Capitalized terms used but not otherwise defined in this Order have the meanings given to them in the Motion or in the Procedures Motion filed at Docket Number 13476, as applicable.

<sup>&</sup>lt;sup>2</sup> WSP Michigan Inc. (F/K/A Parsons Brinckerhoff Michigan Inc.) Response to City of Detroit's Motion to Establish Procedures for Distribution of New B Notes to Holders of Allowed Class 14 Claims Under the City's Plan of Adjustment and Request for Modification of Proposed Order (Docket # 13480, the "Response"). The Response was stricken by the Court, on December 16, 2021 (Docket # 13484).

13487); no hearing being necessary as there have been no other timely responses filed; and; and, after due deliberation, the Court finding good and sufficient cause to enter this Order.

#### IT IS ORDERED THAT:

- 1. The Motion is granted.
- 2. The terms of the Court's Procedures Order entered at Docket Number13488 are superseded and replaced in their entirety by this Order.
- 3. 2. The form of the Distribution Failure Notice in substantially the same form as attached to the Procedures Motion is authorized and approved; provided, however, that the City may modify the Distribution Failure Notice to allow for one or more additional attempts to Distribute New B Notes to a Claimholder in the City's sole discretion. The City must set the deadline for responding to a Distribution Failure Notice at least 30 days from the date of the mailing of that Distribution Failure Notice.
- 4. 3. The City is authorized to serve, by first-class mail, copies of this

  Order, the Distribution Failure Notice, a Brokerage Account Form, and a pre-paid
  return envelope on any Claimholder to whom the Disbursing Agent
  unsuccessfully attempted to Distribute New B Notes. After two unsuccessful
  attempts have been made by the City to Distribute New B Notes to a Claimholder,
  the City may, but is not required to, serve one or more additional Distribution

Failure Notices, Brokerage Account Forms, and pre-paid return envelopes on a Claimholder and make additional attempts to Distribute New B Notes to a Claimholder (even if earlier attempts by the Disbursing Agent to Distribute New B Notes to that Claimholder were unsuccessful). Unless a Claimholder has complied with the Plan and the requirements of Federal Rule of Bankruptcy Procedure 3001(e)(2) concerning a transfer of claim (other than for security after a proof of claim has been filed) or properly filed a change of address form, the foregoing documents are to be sent to the name and address for notice identified in the proof of claim.

5. 4-If the Distribution of New B Notes to Claimholder WSP Michigan Inc. ("WSP") is unsuccessful, in addition to the notice via first class mail as provided in the preceding paragraph, the City will also provide the notice to WSP by email to Kris.Jacobsen@wsp.com. Notwithstanding the language in paragraph 6 of this Order, if Claimholder WSP chooses to return a new Brokerage Account Form, Claimholder WSP may email the information that it would have provided on a Brokerage Account Form to the City at swansonm@millercanfield.com from the email address Kris.Jacobsen@wsp.com and such information will be treated as if it were contained within a Brokerage Account Form. The emailed information must otherwise comply with the requirements for a Brokerage Account Form as set forth in this Order.

44137843 1/022765 00213

- 5. For Claimholders who elect to return a new Brokerage Account

  Form, unless the Claimholder has complied with the Plan and the requirements of

  Federal Rule of Bankruptcy Procedure 3001(e)(2) concerning a transfer of claim

  (other than for security after a proof of claim has been filed), the name of the

  creditor on the Brokerage Account Form must match the name of the creditor on

  the proof of claim form and the Distribution will be made in the name of the

  creditor on the proof of claim form. If a Claimholder returns a Brokerage

  Account Form that does not comply with this paragraph of this Order, the City is

  authorized to disregard the Brokerage Account Form and rely on Brokerage

  Account Forms previously submitted by the Claimholder that do comply with this

  paragraph, if any.
- 7. 6. The City is authorized to make modifications to Distribution
  Failure Notices and Brokerage Account Forms, both before and after these
  documents have been filled out, that the City in good faith believes are
  nonmaterial and necessary or appropriate to effectuate the relief provided for by
  this Order. The City is not required or obligated to accept or take any action on
  any instructions or information provided by a Claimholder, including instructions
  or information which may be provided by email, letter, phone call or any other
  type of oral or written communication, with respect to a Distribution other than a
  properly completed and timely received Brokerage Account Form.

44137843.1/022765.00213 13-53846-tit Doc 13979 Filed 07/14/25 Entered 07/14/25 14:24:19 Page 20 of 24

7. If the Disbursing Agent attempts to Distribute New B Notes to a Claimholder after the deadline identified in a Distribution Failure Notice served on that Claimholder has passed, and if that Distribution is not successful, then for that Claimholder, (a) all Distributions of the City may, in its sole discretion, (1) elect to send one or more additional Distribution Failure Notices, Brokerage Account Forms, and pre-paid return envelopes to that Claimholder and make additional attempts to Distribute New B Notes to that Claimholder (without waiving or foregoing the right to exercise the options in clause (2) of this paragraph 8 with respect to any additional attempts to Distribute New B Notes to that Claimholder), or (2) after two failed attempts to Distribute New B Notes to a Claimholder have been made by the City, determine that the claim is "Undeliverable or Unclaimed" as defined in Article V.I.4 of the Plan, in which case, the City, in its discretion, is authorized to exercise any one or more of the following options:

a. All Related Income with respect to that Claimholder now owing or which later may come due to such Claimholder will, in the discretion of the City, (i) may be Distributed to such Claimholder even if the City is unable to transfer the underlying New B Notes to the Claimholder (in instances where the City, in the City's judgment, is reasonably confident that it can distribute the Related Income to that Claimholder), or (ii) may irrevocably revert to the City and, in which case any Claim in respect of such Distributions will be released and forever barred from assertion against the City and its property; (b) the City is authorized and directed to cancel any B Notes

- held for Distribution to that Claimholder, and those B Notes will be of no further force or effect and (
- b. the City is authorized to cancel any New B Notes held for Distribution to that Claimholder, in which case any Claim in respect of those New B Notes will be released and forever barred from assertion against the City and its property, and those New B Notes will be of no further force or effect; and/or
- c. e) the proof of claim(s) filed by that Claimholder will may be disallowed and expunged.
- 8. The City is authorized but not obligated to take any other action necessary or appropriate to further implement the terms of this Order, including, without limitation, to extend a Distribution Failure Notice deadline or make one or more additional attempts to Distribute New B Notes to a Claimholder.
- 9. 9. The At the direction of the City, the City's claims agent is authorized and directed to revise the claims register as necessary to effect the terms of this Order (including, without limitation, to evidence the relief specified elected by the City in paragraph 78 of this Order with respect to any Claimholder).
- 10. 10. This Order is entered in furtherance of this Court's reserved jurisdiction to enter any orders that may be necessary or appropriate to implement or consummate the provisions of the Plan, and to ensure that Distributions to Claimholders are accomplished in accordance with the provisions of the Plan.

- 11. In implementing and enforcing the terms of this Order and the Plan, the City and its Related Entities are entitled to all privileges and protections of the Plan, including the exculpation set forth in Article III.D.6., in connection herewith and therewith.
- 12. 12. This Order does not modify the Plan or the Confirmation Order.

  Each and every term and condition in the Plan and Confirmation Order, including, without limitation, those with respect to the Allowed Claims and Distributions, remains in full force and effect. Furthermore, nothing in this Order modifies or amends the Brokerage Order appearing at Docket Number 13173. The Brokerage Order shall remain in full force and effect.
- 13. 13. This Court retains jurisdiction over the interpretation and enforcement of this Order.

Summary report: Litera Compare for Word 11.8.0.56 Document comparison done on 7/14/2025 2:10:20 PM		
Style name: Miller Canfield Standard		
Intelligent Table Comparison: Active		
Original DMS: iw://work.mcps.com/ACTIVE/38453081/5	5	
Modified DMS: iw://work.mcps.com/ACTIVE/44137843/	4	
Changes:		
Add	53	
<del>Delete</del>	37	
Move From	2	
Move To	2	
Table Insert	0	
Table Delete	0	
Table moves to	0	
Table moves from	0	
Embedded Graphics (Visio, ChemDraw, Images etc.)	0	
Embedded Excel	0	
Format changes	0	
Total Changes:	94	