

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re	)	Chapter 9
	)	
CITY OF DETROIT, MICHIGAN	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Steven W. Rhodes

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**THE RETIRED DETROIT POLICE MEMBERS ASSOCIATION’S  
STATEMENT OF ISSUES ON APPEAL**

Appellant, the Retired Detroit Police Members Association (the “RDPMA”), pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), hereby states the following issues to be presented in this appeal regarding the RDPMA’s December 13, 2013 notice of appeal [Doc. No. 2111], filed pursuant to Bankruptcy Rule 8001 and 28 U.S.C. § 158(a), from the Order for Relief Regarding Eligibility [Doc. No. 1946], entered December 5, 2013 (the “Order”).

**Statement of Issues Presented on Appeal**

1. Whether the Bankruptcy Court erred in finding that PA 436 is not unconstitutional as a violation of the right to referendum in article II, section 9 of the Michigan Constitution.
  - a. Whether PA 436, as essentially a reenactment of the rejected PA 4, was subject to the requirement in article II, section 9 of the Michigan Constitution that it be approved by a majority of the electors.
  - b. Whether the inclusion of spending provisions in PA 436 specifically in order to immunize it from the referendum following the rejection of PA 4 violates article II, section 9 of the Michigan Constitution.
2. Whether the Bankruptcy Court erred in finding that the City of Detroit can be specifically authorized under PA 436 to be a Chapter 9 debtor as required by 11 U.S.C. § 109(c)(2).



Dated: December 26, 2013

Respectfully Submitted,

**STROBL & SHARP, P.C.**

/s/ Lynn M. Brimer

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