

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

In Re:	]	
	]	
CITY OF DETROIT, MICHIGAN	]	Chapter 9
	]	Case No. 13-53846
Debtor.	]	Hon. STEVEN W. RHODES
MAURIKIA LYDA, JOHN SMITH,	]	
NICOLE HILL, ROSALYN WALKER,	]	
ANNETTE PARHAM, JANICE WARD,	]	Adv. Pro. 14-04732
SYLVIA TAYLOR, SCOTT EUBANK,	]	Hon. STEVEN W. RHODES
JOANN JACKSON, TAMMIKA R.	]	
WILLIAMS, individually and behalf of	]	
all other similarly situated, and	]	
MICHIGAN WELFARE RIGHTS	]	
ORGANIZATION, PEOPLES WATER	]	
BOARD, NATIONAL ACTION	]	
NETWORK-MICHIGAN CHAPTER,	]	
and MORATORIUM NOW!,	]	
Plaintiffs,	]	
	]	
v.	]	
CITY OF DETROIT, a Municipal	]	
Corporation, through the Detroit	]	
Water and Sewerage Department, its	]	
Agent,	]	
	]	
Defendant.	]	
	]	

**CORRECTED**  
**DECLARATION OF KATE LEVY**

Kate Levy declares pursuant to 28 U.S.C. § 1746:

1. On August 23, 2014 Defendant Detroit Water and Sewerage Department held a Customer Payment Fair at Cobo Hall. I arrived at approximately 10:30 a.m. The Detroit Water and Sewerage Department Moratorium on Shutoffs was scheduled to end on August 26, 2014.
  
2. During the August 23, 2014 "Fair", hundreds of customers attended. Customers

waited in lines for at least 90 minutes before being placed in a huge room where we were able to sit down. The lines ran the length of Coho Hall; children, elderly, people in wheelchairs, people sitting in portable chairs; some standing quietly in line.

3. When the Detroit Water and Sewerage Department customers reached the entrance to the main hall, where the "Fair itself" was held, each person had to be electronically wanded; had to empty their purse and had to go through a metal detector. I saw two children, approximate ages, five (5) and seven (7) wanded.

4. After going through the metal detector, each person or family was then sent to another line where they received a number.

5. After receiving a number the person or family was directed to the very center of the room where a group of chairs was located. The room was huge. Once a person or family sat down a person was called on the megaphone.

6. By 12:30 p.m. customer service agents had only called about 300 of the 1,200 or more people there. Greg Eno, a spokesperson for Detroit Water and Sewerage Department advised me that he was surprised that "people had no idea" they had to pay 10% down and many came without any money. I later looked at DWSD promotional materials for the fair and found no evidence that individuals had been informed of the requirement to put 10% of their total bill down in order to enter into a payment plan. Those with no money were told they could enter payment plans but within two weeks if the 10% was not paid, their water service would be shut off. Greg Eno did not know if the "Fair" would cause a delay in water service being reconnected.

7. By the end of the "fair" only Detroit Water and Sewerage Department customers had been serviced. Others were given vouchers to go to a Detroit Water and Sewerage Department Customer Service Center prior to Thursday, August 29<sup>th</sup> or face shutoff of their water.

8. On August 26, 2014, I personally visited Defendant Detroit Water and Sewerage Department's Westside Payment Center at approximately 10:30 a.m. in the morning.

9. When I arrived at the Westside Payment Center, because the Center was so full, there were several rows of chairs in the middle of the side street that runs next to the Payment Center. Approximately 100 people were outside. It was like a Secretary of State's Office on the sidewalk. There were several Detroit uniform police officers out on the sidewalk.

10. Addresses were called on a megaphone, one by one. I heard an address every five (5) minutes.

11. By noon on August 26, 2014, many Detroit Water and Sewerage Department customers who had been there since 8:30 a.m. that day, had not been serviced. Other

customers reported they could not get online or through on the phones.

12. The weather temperature outside grew hotter and hotter, and the sun began to affect some of the customers physically. At some point at approximately 11:00 a.m., a police officer came over the megaphone, told everyone to calm down, as many customers seemed disturbed by the dehumanizing manner in which they were treated.

13. While I was there, one of the Detroit Water and Sewerage Department customers advised me that her water had been cut off for the first time the week of August 20, 2014, during a time that Detroit Water and Sewerage Department had declared a moratorium.

14. From what I saw at the Westside Payment Center, even after the Saturday Payment Fair, there was not enough Detroit Water or Sewerage Department staff or administrative capacity to provide adequate services to its Detroit Water and Sewerage Department customers.

15. The Detroit police presence was intimidating and gave the entire collection process a “policed atmosphere”.

16. This declaration is the same I made on August 29, 2014 except that upon review I found certain dates had to be corrected.

Executed: August 30, 2014

/s/ Kate Levy  
KATE LEVY