

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

Case No. 08-53104

GREEKTOWN HOLDINGS, L.L.C., et
al.,¹

In Proceedings Under
Chapter 11
Jointly Administered

Debtors.

Hon. Walter Shapero

**ORDER REGARDING DISCOVERY OF ELECTRONICALLY STORED
INFORMATOION FROM DEBTORS ON PROPOSED PLANS OF REORGANIZATION**

Upon the motion (the "Motion") filed on August 27, 2009 by the Official Committee of Unsecured Creditors (the "Committee"), Deutsche Bank Trust Company Americas, as Indenture Trustee ("DBTCA"), and MFC Global Investment Management (U.S.), LLC ("MFC", collectively with the Committee and DBTCA the "Joint Movants"), pursuant to Rule 7026-3 of the Local Rules for the United States Bankruptcy Court for the Eastern District of Michigan (the "Local Rules"), for authorization to conduct discovery in connection with the Plan¹ and the Luna Plan (the

¹ The Debtors' bankruptcy cases are jointly administered with Greektown Holdings, L.L.C., Case No. 08-53104, Greektown Casino, L.L.C., Case No. 08-53106; Kewadin Greektown Casino, L.L.C., Case No. 08-53105; Monroe Partners, L.L.C., 08-53107; Greektown Holdings II, Inc., Case No. 08-53108; Contract Builders Corporation, Case No. 08-53110; Realty Equity Company Inc., Case No. 08-53112; and Trappers GC Partner, LLC, Case No. 08-53111.

² On June 1, 2009, the above-captioned debtors (the "Debtors") and Merrill Lynch Capital Corporation, as Administrative Agent for the Pre-petition Lenders and the DIP Lenders (the "MLCC," and together with the Debtors, the "Plan Proponents") filed the Joint Plans of Reorganization. On August 6, 2009, the Plan Proponents filed the First Amended Joint Plans of Reorganization. On August 26, 2009, the Plan Proponents filed the Second Amended Joint Plans of Reorganization (the "Plan"). On August 11, 2009, Luna Greektown LLC ("Luna") and Plainfield Asset Management LLC and its Affiliates ("Plainfield," and together with Luna, the "Luna Plan Proponents") filed their Joint

"Joint Movants' Discovery"), seeking both the production of documents (the "Joint Movants' Document Requests") and depositions of witnesses from the Plan Proponents, Conway MacKenzie & Dunleavy ("CMD"), the Fine Point Group ("FPG") and Moelis & Company ("Moelis") and the Luna Plan Proponents, and upon the joint statement filed by the Joint Movants, the Plan Proponents, the Luna Plan Proponents, the City, and FPG on September 17, 2009 at the direction of the Court with respect to the Motion; an evidentiary hearing having been held on the Motion on September 22, 2009; and upon the evidence and arguments presented at such hearing and for good cause shown,

IT IS HEREBY ORDERED that with regard to electronically stored information ("ESI") the Debtors shall gather and produce, subject to privilege and attorney work product as applicable, emails from October 1, 2008 through September 16, 2009 to and from Cliff Vallier, Jason Pasko, Greg Khatchatrian, Bill Williams, and Alan Kerridge using the following list of search terms (the "Terms"): (a) Plan; (b) Valuation; (c) Liquidation Analysis; (d) Projections; (e) Sale Efforts; (f) Exit Financing; (g) assum!; (h) rollback; (i) roll-back; and (j) development w/1 agreement.

Plans of Reorganization for the Debtors. On August 20, 2009 and August 26, 2009, the Luna Plan Proponents filed amended versions of their joint plans of reorganization. On August 28, 2009, the Luna Plan Proponents filed the Luna Greektown LLC and Plainfield Asset Management LLC and its Affiliates' Amended Joint Plans of Reorganization for the Debtors (the "Luna Plan").

IT IS HEREBY FURTHER ORDERED that the initial production will not include email attachments. Particular email attachments identified by the Joint Movants will be produced upon request within reason. All production shall be subject to any agreed confidentiality terms.

IT IS HEREBY FURTHER ORDERED that should the Joint Movants seek additional material after the Debtors' initial search and production, the Debtors have reserved the right to object to Joint Movants' request for additional material and to request that the Court determine whether the initial production was sufficient and any further search justified, and the Court shall apply the "clear and convincing" standard to any such determination with Joint Movants bearing such burden.

Used	Hits	Hit Ratio
GTC	16,698	9.31%
Merrill	1,823	1.02%
Stoll	279	0.16%
Moelis	1,372	0.76%
CMD	702	0.39%
Conway	4,639	2.59%
Randy	3,470	1.93%
Fine	2,466	1.37%
Fine Point	4,569	2.55%
FPG	758	0.42%
Schafer & Weiner	308	0.17%
Cliff Vallier	15,698	8.75%
Plan	11,393	6.35%
POR	133	0.07%
Notes	8,236	4.59%
Noteholder	36	0.02%
Senior Notes	262	0.15%
DB	524	0.29%
Deutsche	319	0.18%
Deutsche Bank	304	0.17%
Trustee	984	0.55%
valuation	578	0.32%
earning	861	0.48%
revenue	15,268	8.51%
projection	300	0.17%
model	2,277	1.27%
upside	174	0.10%
non-core	55	0.03%
garage	5,995	3.34%
parking	6,417	3.58%
intercompany	0	0.00%
inter-company	18	0.01%
terminal	1,055	0.59%
EBITDA	1,972	1.10%
EBITDAR	2,054	1.15%
DCF	7	0.00%
discounted	432	0.24%
leverage	259	0.14%
multiple	2,766	1.54%
sell	2,553	1.42%
sale	3,083	1.72%
bid	2,335	1.30%
discount rate	75	0.04%
cash	19,836	11.06%



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comp	10,519	5.86%
comparable	373	0.21%
claim	4,247	2.37%
liquidation	337	0.19%
exit	2,144	1.20%
financing	1,898	1.06%
finance	7,779	4.34%
construction	10,797	6.02%
construction cost	76	0.04%
construction disbursement	0	0.00%
construction budget	95	0.05%
WACC	9	0.01%
weighted average cost of capital	9	0.01%
precedent	21	0.01%
value	6,041	3.37%
bond	1,337	0.75%
bondholder	18	0.01%
secured	2,048	1.14%
unsecured	1,017	0.57%
oversecured	2	0.00%
over-secured	2	0.00%
buyer	704	0.39%
bidder	103	0.06%
margin	1,007	0.56%
lender	802	0.45%
sensitivity	175	0.10%
profit	2,740	1.53%
restructuring	2,581	1.44%
restructuring fee	1	0.00%
restructuring charge	15	0.01%
net income	1,825	1.02%
operating	5,388	3.00%
operating account	284	0.16%
management	284	0.16%
management fee	368	0.21%
DIP	2,131	1.19%
base	5,048	2.81%
base case	12	0.01%
rollback	636	0.35%
roll-back	266	0.15%
avoidance	181	0.10%
fraudulent	274	0.15%
board	15,681	8.74%
release	4,839	2.70%
license	1	0.00%
assumption	536	0.30%
100,000,000	82	0.05%

one hundred million	0	0.00%
1 million	1,055	0.59%
100 million	94	0.05%
effective	6,323	3.52%
effective date	1,545	0.86%
undersecured	7	0.00%
under-secured	2	0.00%
variance	11,185	6.24%
subcommittee	53	0.03%
sub-committee	15	0.01%
performance	8,095	4.51%
reconciliation	1,255	0.70%
reconciling	359	0.20%
methodology	220	0.12%
preference	451	0.25%
tribe	1,463	0.82%
MGCB	22,869	12.75%
stalking	15	0.01%
stalking horse	11	0.01%
forecast	2,314	1.29%
development	12,242	6.82%
development agreement	934	0.52%
mapping	165	0.09%
departmental	2,860	1.59%
department	25,704	14.33%
financial	9	0.00%
financials	879	0.49%
Totaro	5,366	2.99%
Colwell	7,167	4.00%
Carlston	249	0.14%
Jamal	1,604	0.89%
Fuller	854	0.48%
Moore	13,369	7.45%
Calderone	2,818	1.57%
Berry	4,361	2.43%
Davidson	2,717	1.51%