

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

\_\_\_\_\_  
THE CITY OF HARRISBURG, PA )  
 )  
DEBTOR )  
\_\_\_\_\_ )

Case No.1: 11-bk-06938 MDF

Chapter 9

**RESPONSE OF GOVERNING BODY OF THE CITY OF HARRISBURG IN  
OPPOSITION TO THE OBJECTIONS OF THE MAYOR OF HARRISBURG, THE  
COUNTY OF DAUPHIN AND COMMONWEALTH OF PENNSYLVANIA**

The Governing Body of the City of Harrisburg, its City Counsel through its attorneys Mark D. Schwartz, Esquire and David A. Gradwohl, Esquire respond to the Objections of the Mayor of Harrisburg, The County of Dauphin, and the Commonwealth of Pennsylvania (the “Governmental Entities”) as follows:

1. Council for the City of Harrisburg met the applicable requirements of Section 109 (c) of Title 11 of the United States Code (the “Bankruptcy Code”) with respect to the filing of the Voluntary Petition for Relief docketed with this Court on October 11, 2011
2. Council for the City of Harrisburg was authorized as a matter of state law to file these proceedings on behalf of the City.
3. Council for the City of Harrisburg was authorized as a matter of local law and practice to file these proceedings on behalf of the City.
4. Reference is made to the Brief filed on behalf of Petitioner in these proceedings.

Respectfully submitted,

/s/ Mark D. Schwartz

MARK D. SCHWARTZ, Esquire (Attorney I.D. 30527)  
DAVID A. GRADWOHL, Esquire (Attorney I.D. 18340)

PO Box 330  
Bryn Mawr, PA 19010  
610 525-5534

Attorneys for the Governing Body of the City of Harrisburg, PA  
Its City Council