

NOV 23 2015

UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT

DEBORAH S. HUNT, Clerk

Case Number: 15-2371 (RLB)

Case Name: Separate Annuity from Bankruptcy Proceedings

Name: Lucinda J. Darrah

Address: 492 Peterboro

City: Detroit State: Mi Zip Code: 48201

PRO SE APPELLANT'S BRIEF

**Directions:** Answer the following questions about the appeal to the best of your ability. Use additional sheets of paper, if necessary, not to exceed 30 pages. Please print or write legibly, or type your answers double-spaced. You need not limit your brief solely to this form, but you should be certain that the document you file contains answers to the questions below. The Court prefers short and direct statements.

Within the date specified in the briefing letter, you should return one signed original brief to:

United States Court of Appeals For The Sixth Circuit  
540 Potter Stewart U.S. Courthouse  
100 East Fifth Street  
Cincinnati, Ohio 45202-3988

1. Did the District Court incorrectly decide the facts?  Yes  No

If so, what facts?

Mediation assumed that annuity is an asset of the City of Detroit, while it is an asset of the contributors.

2. Do you think the District Court applied the wrong law?  Yes  No

If so, what law do you want applied?

The Fourth Amendment of the United States Constitution

3. Do you feel that there are any others reasons why the District Court's judgment was wrong?

Yes  No

If so, what are they?

4. What specific issues do you wish to raise on appeal?

Annuitiy is the property of the contributors and it cannot be mixed with the city funds. Nobody is authorized by the contributors to hand over the annuity to the city fund. The clawback was illegal.

5. What action do you want the Court of Appeals to take in this case?

To separate annuity from bankruptcy proceedings as per Amendment Four of the United States Constitution.

I certify that a copy of this brief was sent to opposing counsel via U.S. Mail on the 18 day of November, 2015.

Signature (Notary not required)



United States Court of Appeals  
for the Sixth Circuit

Lucinda J. Darrah  
appellant

case # 15-2371 (RLB)

vs  
City of Detroit  
debtor

Proof of Service

On November 18, 2015, I served  
my Pro Se Appellant's Brief by 1<sup>st</sup>  
class mail to

Heather Lenox  
Jones Day  
222 East 41<sup>st</sup> Street  
New York, New York  
10017-6702

Lucinda J. Darrah 11/18/2015

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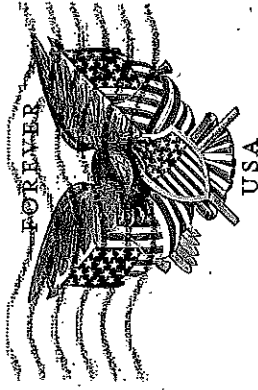
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Lucinda J. Darrah 11/18/2015

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