

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

|                            |   |                       |
|----------------------------|---|-----------------------|
|                            | X |                       |
|                            | : |                       |
| In re                      | : | Chapter 9             |
|                            | : |                       |
| CITY OF DETROIT, MICHIGAN, | : | Case No. 13-53846     |
|                            | : |                       |
| Debtor.                    | : | Hon. Thomas J. Tucker |

**STIPULATION REGARDING THE FILING OF AN OBJECTION TO CLAIM NO. 3750  
FILED BY THE STATE OF MICHIGAN**

The City of Detroit, Michigan (the “City”) and the State of Michigan (the “State”), by and through their undersigned counsel, file this stipulation (the “Stipulation”) regarding the filing of an objection to Claim No. 3750 (the “Claim”) filed by the State, stating as follows.

1. The State filed the Claim on June 2, 2014.
2. The State categorized the Claim as an Administrative Claim<sup>1</sup>. The City disagrees with this categorization.
3. Pursuant to the Plan, the bar date for filing objections to Administrative Claims was 150 days after the Effective Date, or May 9, 2015 (“Administrative Claims Objection Bar Date”). Plan II.A.2. The City does not believe that the Administrative Claims Objection Bar Date applies to the Claim because the Bar Date Order provides that “all administrative claims under section 503(b) of the Bankruptcy Code, other than 503(b)(9) claims and the administrative portion of Rejection Damages Claims, shall not be deemed proper if asserted by proof of claim” (Bar Date Order, ¶ 5), and the State filed the Claim using a proof of claim form. The State disagrees with the City’s position.

<sup>1</sup> Capitalized terms not otherwise defined shall have the same meaning ascribed to them in the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (the “Plan”).



4. On May 7, 2015, the City and the State filed a stipulation to extend the deadlines for objecting to certain State claims filed as Administrative Claims to July 8, 2015.

5. On July 7, 2015, the City and the State filed an additional stipulation to extend the deadlines for objecting to certain State claims filed as Administration Claims to August 7, 2015.

6. The City and the State have resolved all of the State claims filed as Administrative Claims except Claim No. 3750. The City and the State are continuing to work toward a resolution as to Claim No. 3750.

7. On August 6, 2015, the Court entered an Order extending the City's deadline to file an objection to the Claim through and including October 7, 2015. The City and the State agree that more time is needed to resolve the Claim and request further extension of the deadline for objecting to the Claim to December 7, 2015

8. The City and the State agree that notwithstanding anything in this Stipulation, the City and the State each reserve all their arguments as to the Claim, including that (i) the State agrees this Stipulation shall not be deemed to support in any way an argument that the Claim is an Administrative Claims or that the Administrative Claims Objection Bar Date applies to the Claim and (ii) the City's arguments that the Claim is not an Administrative Claims and the Administrative Claims Objection Bar Date does not apply to it is not affected by this Stipulation. The State reserves all of its other rights as to the Claim, and the City reserves all of its rights as to the Claim.

WHEREFORE, the City and the State stipulate and agree that the City may object to the Claim through and including December 7, 2015.

STIPULATED AND AGREED TO ON OCTOBER 1, 2015 BY:

MILLER, CANFIELD, PADDOCK  
& STONE, P.L.C.

By: /s/ Marc N. Swanson

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*Counsel to the State of Michigan*

**EXHIBIT 1-PROPOSED ORDER**

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| -----X                     |   |                       |

**ORDER REGARDING THE FILING OF OBJECTIONS TO CERTAIN CLAIMS FILED  
BY THE STATE OF MICHIGAN**

Upon the stipulation (the “Stipulation”) of the City of Detroit (the “City”), and the State of Michigan (the “State”), for entry of an order regarding the filing of objections to certain State claims, namely, proof of claim numbered 3750 (the “Claim”); and the Court being fully advised in the premises;

**IT IS ORDERED THAT:**

1. The City may object to the Claim through and including December 7, 2015.