

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT

IN THE MATTER OF:

CITY OF DETROIT, MICHIGAN

Debtor.

Case No. 13-53846

Honorable THOMAS J. TUCKER

Chapter 9

FILED  
2015 NOV 18 P 4:51  
U.S. BANKRUPTCY COURT  
E.D. MICHIGAN - DETROIT

**STIPULATION FOR RESOLUTION OF CLAIM 3451 FILED BY KIM SPICER AND THE  
OBJECTION THERETO FILED BY THE CITY OF DETROIT WATER AND SEWERAGE  
DEPARTMENT BY BINDING ARBITRATION BEFORE  
THE AMERICAN ARBITRATION ASSOCIATION EMPLOYMENT PANEL**

Kim Spicer, Claimant, and the City of Detroit Water and Sewerage Department ("DWSD"), by and through the undersigned, stipulate as follows in support of a resolution of the Objection to Claim Number 3451 Filed by Kim Spicer (the "Objection"),

1. Mr. Spicer is the holder of Claim Number 3451 (the "Claim"). The Claim is for discrimination based on race and retaliation.

2. On December 30, 2014, DWSD objected to the Claim. DWSD objected on the basis of the fact that, in pertinent part, no affirmative steps were taken to pursue the Claim through the Alternative Dispute Resolution Procedures and no evidence indicating that there is a colorable basis for the Claim has been offered by the Claimant.

3. The parties have agreed that DWSD's Objection to Claim Number 3451 filed by Claimant shall be submitted to and resolved by binding arbitration conducted by an employment arbitrator from the American Arbitration Association Employment panel on or before ~~November 13, 2015~~ December 10, 2015.

4. Nothing in this stipulation will be construed as an admission by DWSD that it has any liability to the Claimant on account of the Claim or a waiver of any arguments DWSD may have. DWSD reserves all its rights in this matter.



Respectfully submitted by:

KIM SPICER

/s/

Kim Spicer  
13029 Stamford  
Warren, Michigan 48089  
(313)324.6000

KILPATRICK & ASSOCIATES, P.C.

/s/

RICHARD O. KILPATRICK (P35275)  
JAMES M. MCARDLE, ESQ. (ARDC 6203305)  
Attorneys for City of Detroit Water  
and Sewerage Department  
615 Griswold, Suite 1708  
Detroit, MI 48226  
(313) 963-2581  
[ecf@kaalaw.com](mailto:ecf@kaalaw.com)

Dated: ~~October 30, 2015~~

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT

FILED  
2015 NOV 18 P 4:55  
U.S. BANKRUPTCY COURT  
E.D. MICHIGAN

IN THE MATTER OF:

CITY OF DETROIT, MICHIGAN

Debtor.

Case No. 13-53846

Honorable THOMAS J. TUCKER

Chapter 9

**ORDER ALLOWING FOR RESOLUTION OF CLAIM 3451 FILED BY KIM SPICER AND  
THE OBJECTION THERETO FILED BY THE CITY OF DETROIT WATER AND  
SEWERAGE DEPARTMENT BY BINDING ARBITRATION BEFORE  
THE AMERICAN ARBITRATION ASSOCIATION EMPLOYMENT PANEL**

This matter having come before the Court by Stipulation of the City of Detroit Water and Sewerage Department ("DWSD") and Kim Spicer regarding Claim Number 3451 and the Objection thereto ("Objection"); and the Court being otherwise fully advised in the premises;

**IT IS HEREBY ORDERED** that Claim Number 3451 filed by Kim Spicer and the objection thereto filed by the City of Detroit Water and Sewerage Department contesting the amount of the claim shall be submitted to and resolved by binding arbitration by an employment arbitrator before the American Arbitration Association Employment Panel on or before ~~November 13, 2015.~~ *December 10, 2015.*

