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

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

STIPULATION FOR ENTRY OF ORDER REGARDING CLAIM NO. 1437 OF WADE TRIM ASSOCIATES INC.

Wade Trim Associates Inc. ("Wade Trim") and the City of Detroit, Michigan (the "City"), by and through the undersigned, stipulate as follows in support of the entry of the *Order Regarding Claim No. 1437 Of Wade Trim Associates Inc.* attached hereto as **Exhibit 1.**

1. On February 19, 2014, Wade Trim filed its proof of claim [Claim No. 1437] (the "Claim") in the amount of $69,704.29.

2. In resolution of Wade Trim's Claim, the parties have agreed that: (a) the City will pay $20,900.72 to Wade Trim, (b) the remainder of the Claim will be allowed as a general unsecured claim in the reduced amount of $31,931.53 and (c) Wade Trim has no other claims against the City, whether for the pre-petition or post-petition periods.

3. Nothing in this stipulation is to be construed as a waiver of any of the City's rights to assert and pursue any claims against Wade Trim, including, without limitation, claims under chapter 5 of the Bankruptcy Code.

WHEREFORE the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** approving the parties' stipulation.

Respectfully submitted by:

WADE TRIM ASSOCIATES INC.	**FOLEY & LARDNER, LLP**
By: /s/ Ralph Picano (with consent) Ralph Picano Wade Trim Associates Inc. 500 Griswold St. Ste. 2500 Detroit, MI 48226 Phone: (313) 961-3650 rpicano@wadetrim.com *Representative for Wade Trim Associates Inc.*	By: /s/ John A. Simon John A. Simon (P61866) Tamar N. Dolcourt (P73425) Leah R. Imbrogno (P79384) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jsimon@foley.com tdolcourt@foley.com limbrogno@foley.com *Counsel to the City of Detroit, Michigan*

Dated: November 24, 2015

EXHIBIT 1: PROPOSED ORDER

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

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

ORDER REGARDING CLAIM NO. 1437 OF WADE TRIM ASSOCIATES INC.

This matter having come before the Court on the *Stipulation For Entry of Order Regarding Claim No. 1437 Of Wade Trim Associates Inc.* (the "Stipulation"); Wade Trim[1] having filed Claim No. 1437 (the "Claim") in the above-captioned bankruptcy case; the parties having agreed that Claim No. 1437 should be resolved pursuant to the parties agreement in the Stipulation; and the Court being otherwise fully informed:

IT IS HEREBY ORDERED THAT:

1. The Stipulation is approved as provided herein.

2. The City shall pay $20,900.72 to Wade Trim.

3. Claim No. 1437 of Wade Trim shall be allowed as a general unsecured claim in the reduced amount of $31,931.53, which constitutes Wade Trim's only outstanding claim in this bankruptcy, whether for the pre-petition or post-petition period.

4. The City's claim's agent is authorized to update the claims register accordingly.

[1] Capitalized terms not otherwise defined herein shall have the meaning given to them in the Stipulation.