

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

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

**STIPULATION FOR ORDER WITHDRAWING
DPLSA CLAIM #1861 as MOOT**

The City of Detroit, Michigan (“City” and the Detroit Lieutenants and Sergeants Association (“DPLSA”), by and through their undersigned counsel, hereby stipulate to the entry of an Order Confirming that Claim Nos. 1861 are resolved by the DPLSA Collective Bargaining Agreement (“the DPLSA CBA”) and the City’s Confirmed Plan of Adjustment and Allowing Withdrawal of DPLSA Claim Nos. 1861, as Moot, in the form attached as Exhibit A. In support of their request, the City and the DPLSA state the following:

1. On February 20, 2014, the DPLSA filed Claim Nos. 1861.
2. Claim No. 1861 was filed during ongoing Court-ordered mediation between the City and the DPLSA in these Chapter 9 proceedings. Claim 1861 sought to preserve DPLSA members’ rights with respect to their terms and conditions of employment with the City.
3. On November 6, 2014, the parties entered into a collective bargaining

agreement (“the DPLSA CBA”) that was



approved by the state and incorporated into the 8th Amended Plan for the Adjustment of Debts of the City of Detroit (the “Plan of Adjustment”). See Plan of Adjustment and Exhibit II.D.5. thereto [Docket Nos. 8045; 8045-10, p.28]. The Plan of Adjustment was confirmed by this Court pursuant to its November 12, 2014 Order Confirming the 8th Amended Plan for the Adjustment of Debts of the City of Detroit [Docket No.8272].

4. The City and the DPLSA agree that (a) the DPLSA CBA resolves the issues with respect to DPLSA members’ terms and conditions of employment with the City; (b) Claim No 1861 should be withdrawn as moot; and (c) as a result of the withdrawal of Claim No. 1861, the DPLSA and its members will have no right to receive any distribution in these bankruptcy proceedings based on Claim No. 1861.
5. The withdrawal of DPLSA claim NO. 1861 (and ostensibly Claim No. 3784 filed for notice purposes only) does not affect any rights that DPLSA has under any other pending claim.

WHEREFORE, the parties request the Court enter an Order in the form attached hereto as Exhibit A.

<Signatures on following page>

STIPULATED AND AGREED:

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Exhibit A

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:: Case No. 13-53846
CITY OF DETROIT, MICHIGAN, :: Hon. Thomas J. Tucker
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**ORDER WITHDRAWING
DPLSA CLAIM #1861 AS MOOT**

This case is before the Court on the stipulation filed on _____ (Docket # _____, the Stipulation) entitled “Stipulation for Order Withdrawing DPLSA Claim #1861 as Moot.” Based on the Stipulation,

IT IS ORDERED THAT Claim No. 1861 filed on behalf of the Detroit Police Lieutenants and Sergeants Association is withdrawn as moot.

Signed on: _____

Thomas J. Tucker
U.S. Bankruptcy Court Judge