

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

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

**STIPULATION FOR ORDER WITHDRAWING
DPLSA CLAIM #1881 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 No. 1881 is resolved by the DPLSA Collective Bargaining Agreement (“the DPLSA CBA”), the City’s Confirmed Plan of Adjustment and the Parties’ Settlement and Allowing Withdrawal of DPLSA Claim No. 1881, 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 No. 1881.
2. Claim No. 1881 was filed during ongoing Court-ordered mediation between the City and the DPLSA in these Chapter 9 proceedings. Claim 1881 asserts DPLSA members’ right to recovery for certain pre-petition grievances (the “Pre-petition Grievances”).
3. This Court has previously confirmed that certain of the Pre-petition



4. Through the mediation process, the City and the DPLSA have entered into and executed a settlement agreement with an effective date of July 15, 2016 with regard to the remaining Pre-petition Grievances, an executed copy of which is in each of the Parties' possession (the "July 15, 2016 Settlement Agreement") and which is available for review by the Court, should the Court find such review necessary.
5. Because all of the Pre-petition Grievances have now been resolved, the Parties agree that: (a) the DPLSA's right to relief for any of the Pre-petition Grievances is governed by the Parties' July 15, 2016 Settlement Agreement; (b) Claim No. 1881 should be withdrawn as moot; (c) as a result of the withdrawal of Claim No. 1881, the DPLSA and its affected members will have no right to receive any distribution in these bankruptcy proceedings based on Claim No. 1881; and (d) the enforcement of the Parties' July 15, 2016 Settlement Agreement will be governed by the terms of the DPLSA's collective bargaining agreement and applicable state law.

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

STIPULATED AND AGREED:

DPLSA ATTORNEYS

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July 18, 2016

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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 #1881 AS MOOT**

This case is before the Court on the stipulation filed on _____ (Docket # _____, the Stipulation) entitled “Stipulation for Order Withdrawing DPLSA Claim #1881 as Moot.” Based on the Stipulation,

IT IS ORDERED THAT Claim No. 1881 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