

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

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

**STIPULATION FOR THE ENTRY OF AN ORDER MODIFYING THIS
COURT’S JUNE 27, 2016 ORDER (DOCKET NUMBER 11326)**

The City of Detroit, Michigan (“City”), AFSCME Council 25 and Its
Affiliated Detroit Locals (“AFSCME”) and the Coalition of Detroit Unions
 (“Coalition”) stipulate and agree as follows:

A. On February 21, 2014, AFSCME filed proof of claim 2958
 (“AFSCME Claim”) which was comprised of 20 components. On that same date,
the Coalition filed proof of claim 2851 (“Coalition Claim”).

B. On May 29, 2015, this Court entered its Order Regarding Further
Proceedings on the City of Detroit’s Objections to Proof of Claim Number 2581
Filed by the Coalition of Detroit Unions and to the Proof of Claim Number 2958
Filed by Michigan AFSCME Council 25 and Its Affiliated Detroit Locals (Doc.
No. 9900).



C. On July 19, 2015, this Court entered the Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (Doc. No. 10071).

D. On September 30, 2015, this Court entered the Order Modifying Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (Doc. No. 10219).

E. On November 25, 2015, this Court entered the Order Modifying This Court's September 30, 2015 Order (Doc. No. 10286).

F. On January 29, 2016, this Court entered the Order Modifying This Court's November 25, 2015 Order (Doc. No. 10740).

G. On April 29, 2016, this Court entered the Order Modifying This Court's January 29, 2016 Order (Doc. No. 11133).

H. On June 27, 2016, his Court entered the Order Modifying This Court's April 29, 2016 Order (Doc. No. 11326) ("Order").

After the entry of the Order, the parties continued their productive discussions regarding the resolution of the Coalition Claim and the AFSCME

Claim and the parties have agreed to the terms of a complete settlement of the AFSCME Claim and the Coalition Claim. The City has obtained approval of the settlement by the City Council. The parties are currently working to finalize a motion and proposed Order for approval of the compromise, which the parties anticipate will be filed within the next three to four weeks. The parties request that the Court provide them with an additional sixty days to finalize and file the motion and for a hearing to be held on the motion.

NOW, THEREFORE, the City, AFSCME and the Coalition stipulate and agree as follows:

1. The filing deadlines in paragraph 1.A of the Order are extended from August 29, 2016 to October 28, 2016.
2. The filing deadlines in paragraph 1.B of the Order are extended from October 28, 2016 to December 27, 2016.
3. The filing deadlines in paragraph 1.C of the Order are extended from November 28, 2016 to January 27, 2017.
4. The filing deadlines in paragraph 1.D of the Order are extended from September 9, 2016 to November 8, 2016.

SO STIPULATED:

/s/ Richard G. Mack
Richard G. Mack, Jr.
Adam Graham
MILLER COHEN PLC
600 West Lafayette Boulevard
4th Floor
Detroit, MI 48226
Telephone: (313) 566-4787
Facsimile: (313) 964-4490
richardmack@millercohen.com

ATTORNEYS FOR AFSCME AND
THE COALITION

/s/ Marc N. Swanson
John H. Willems (P31861)
Jonathan S. Green (P33140)
Marc N. Swanson (P71149)
MILLER, CANFIELD, PADDOCK
AND STONE, P.L.C.
150 West Jefferson
Suite 2500
Detroit, Michigan 48226
Telephone: (313) 963-6420
Facsimile: (313) 496-7500
willems@millercanfield.com

ATTORNEYS FOR THE CITY

DATED: August 26, 2016

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

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

**ORDER MODIFYING THIS COURT’S JUNE 27, 2016 ORDER
(DOCKET NUMBER 11326)**

This case is before the Court on the stipulation filed on August 26, 2016 entitled “Stipulation for the Entry of an Order Modifying this Court’s June 27, 2016 Order (Docket Number 11326)” (Docket # _____, the “Stipulation”).

Based on the Stipulation,

IT IS ORDERED THAT the Court’s June 27, 2016 Order entitled “Order Modifying This Court’s April 29, 2016 Order (Doc. No. 11326)” (the “Order”) is modified as follows:

1. The filing deadlines in paragraph 1.A of the Order are extended from August 29, 2016 to October 28, 2016.
2. The filing deadlines in paragraph 1.B of the Order are extended from October 28, 2016 to December 27, 2016.

3. The filing deadlines in paragraph 1.C of the Order are extended from November 28, 2016 to January 27, 2017.

4. The filing deadlines in paragraph 1.D of the Order are extended from September 9, 2016 to November 8, 2016.