# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re: Bankruptcy Case No. 13-53846

City of Detroit, Michigan, Judge Thomas J. Tucker

> Debtor. Chapter 9

STIPULATION FOR ENTRY OF ORDER GRANTING FOURTH ADJOURNMENT OF HEARING DATE AND EXTENSION OF THE DEADLINE TO FILE REPLY TO RESPONSE TO MOTION OF THE **DETROIT FIRE FIGHTERS ASSOCIATION, IAFF LOCAL 344 ("DFFA")** FOR ENTRY OF AN ORDER ENFORCING THE NOVEMBER 30, 2015 GLOBAL SETTLEMENT BETWEEN THE DFFA AND THE CITY OF DETROIT RESOLVING THAT PORTION OF DFFA CLAIM NO. 2812 RELATED TO THE GRIEVANCE FILED ON BEHALF OF FIRE FIGHTER BRADLEY SMOLA AND REQUIRING SMOLA'S REINSTATEMENT AND FOR RELATED RELIEF

The City of Detroit, Michigan ("City") and the Detroit Fire Fighters Association ("DFFA"), by their undersigned counsel, hereby stipulate and agree as follows:

- 1. On March 15, 2017, the DFFA filed the Motion for Entry of an Order Enforcing the November 30, 2015 Global Settlement Between the DFFA and the City of Detroit Resolving That Portion of DFFA Claim No. 2812 Related to the Grievance Filed on Behalf of Detroit Fire Fighter Bradley Smola and Requiring Smola's Reinstatement and for Related Relief ("Motion") [Doc. No. 11811].
  - 2. The City filed its response on April 5, 2017 [Docket No. 11837].

- 3. The matter is currently set for hearing on Wednesday, August 23 2017, and the Court has set the deadline for the DFFA to file its reply brief as August 16, 2017 [Docket No. 11958].
- 4. The parties have conferred and have agreed to adjourn the hearing until Wednesday, September 20, 2017 at 1:30 p.m. and further ask that the Court extend the deadline for the DFFA to file its reply to the City's response to the Motion through and including September 13, 2017.

WHEREFORE, the Parties respectfully request that the Court enter an order adjourning the hearing on the Motion to September 20, 2017 at 1:30 p.m. and extending the deadline for the DFFA to file its reply to the City's response to the Motion through and including September 13, 2017, in substantially the same form as the proposed order attached as Exhibit 1.

## STIPULATED AND AGREED TO ON August 15, 2017:

## LAW OFFICE OF BARBARA A. PATEK, P.L.C.

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#### **EXHIBIT 1**

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:	Bankruptcy Case No. 13-53846
City of Detroit, Michigan,	Judge Thomas J. Tucker

Debtor. Chapter 9

ORDER GRANTING FOURTH ADJOURNMENT OF HEARING DATE AND EXTENSION OF THE DEADLINE TO FILE REPLY TO RESPONSE TO MOTION OF THE DETROIT FIRE FIGHTERS ASSOCIATION, IAFF LOCAL 344 ("DFFA") FOR ENTRY OF AN ORDER ENFORCING THE NOVEMBER 30, 2015 GLOBAL SETTLEMENT BETWEEN THE DFFA AND THE CITY OF DETROIT RESOLVING THAT PORTION OF DFFA CLAIM NO. 2812 RELATED TO THE GRIEVANCE FILED ON BEHALF OF FIRE FIGHTER BRADLEY SMOLA AND REQUIRING SMOLA'S REINSTATEMENT AND FOR RELATED RELIEF

Upon the Stipulation for Order Granting Fourth Adjournment of Hearing Date and Extension of the Deadline to File Reply to Response to Motion of the Detroit Fire Fighters Association, IAFF Local 344 ("DFFA") for Entry of an Order Enforcing the November 30, 2015 Global Settlement Between the DFFA and the City of Detroit resolving That Portion of DFFA Claim No. 2812 Related to the Grievance Filed on Behalf of Detroit Fire Fighter Bradley Smola and Requiring Smola's Reinstatement and for Related Relief [Doc. No. 11811] ("Motion"); and the Court being otherwise advised in the premises;

IT IS ORDERED THAT the hearing on the Motion now set for August 23, 2017 at 1:30 p.m. is adjourned to September 20, 2017 at 1:30 p.m.;

IT IS FURTHER ORDERED THAT the deadline for the DFFA to file its reply to the City's response to the Motion is hereby extended through and including September 13, 2017.