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

In Re: CITY OF DETROIT,
Debtor

Chapter 9 Case No.: 13-bk-53846
Judge Thomas J. Tucker

____/

Miller Canfield Paddock & Stone, PLC
By: Marc N. Swanson (P71149)
Counsel for City of Detroit
150 W. Jefferson, Ste., 2500
Detroit, MI 48226
313-496-7591
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The Law Office of John D. Mulvihill, PLLC
By: John D. Mulvihill (P35637)
Counsel for Defendant
Agar Lawn Sprinkler Systems, Inc.
20 W. Washington
Clarkston, MI 48346
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____/

SUPPLEMENTAL REPLY OF AGAR LAWN SPRINKLER SYSTEMS, INC. TO CITY OF DETROIT'S OBJECTION TO PROOF OF CLAIM

NOW COMES the above named Defendant , AGAR LAWN SPRINKLER SYSTEMS, INC, "(Agar") by and through its above attorney and hereby submits its SUPPLEMENTAL REPLY TO CITY OF DETROIT'S OBJECTION TO PROOF OF CLAIM and states as follows:

Pursuant to the Court's ORDER REGARDING FURTHER PROCEEDINGS ON THE CITY OF DETROIT'S OBJECTION TO THE CLAIM OF AGAR LAWN SPRINKLER SYSTEMS, INC. (DOCKET # 12671) ("Order"), Agar has attached its List of Unpaid Invoices in support of it Proof of Claim. The invoices are not attached for brevity purposes but have been served on Counsel for the City of Detroit as certified in the attached Certificate of Servi

LAW OFFICE
OF
JOHN D. MULVIHILL
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20 W. Washington
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Clarkston, Mi 48346

(248) 625-3131
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WHEREFORE, Agar requests that the City's Objection To Agar's Proof of Claim be denied and that its claim be deemed an allowed claim.

Respectfully Submitted By:

/s/ John D. Mulvihill
By: John D. Mulvihill, (P35637)
Counsel for Agar
THE LAW OFFICE OF JOHN D. MULVIHILL, PLLC
20 W. Washington, Suite 2
Clarkston, MI 48346
(248) 625-3131

September 11, 2017

Agar Lawn Sprinkler Systems, Inc.

All Past Due Invoicing $ 189,752.63

DPW

Street Electronic Invoice Number	Date	Total Due
204	5/18/2012	$ 583.20
208	5/30/2012	$ 1,174.17
209	5/30/2012	$ 1,060.83
210	5/30/2012	$ 1,187.82
211	5/30/2012	$ 619.14
213	5/30/2012	$ 733.03
214	5/30/2012	$ 1,059.56
205	5/30/2012	$ 1,061.10
206	5/30/2012	$ 489.61
207	5/30/2012	$ 583.20
212	5/30/2012	$ 800.50
215	6/4/2012	$ 1,270.90
216	6/4/2012	$ 1,004.22
217	6/4/2012	$ 965.80
218	6/4/2012	$ 547.94
219	6/4/2012	$ 404.91
220	6/4/2012	$ 550.71
221	6/4/2012	$ 446.92
222	6/4/2012	$ 965.80
231	6/10/2012	$ 1,303.57
232	6/10/2012	$ 642.79
233	6/10/2012	$ 1,399.40
234	6/10/2012	$ 1,193.12
235	6/10/2012	$ 1,549.92
236	6/10/2012	$ 470.08
237	6/21/2012	$ 1,081.61
238	6/21/2012	$ 567.30
239	6/21/2012	$ 410.90

240	6/21/2012	$	423.89
241	6/21/2012	$	637.10
242	6/21/2012	$	604.40
248	6/25/2012	$	1,742.67
249	6/25/2012	$	1,814.31
250	6/25/2012	$	1,264.57
251	6/25/2012	$	753.22
254	7/2/2012	$	392.94
255	7/2/2012	$	572.79
256	7/2/2012	$	747.93
257	7/2/2012	$	1,133.39
258	7/2/2012	$	1,063.38
259	7/2/2012	$	442.70
260	7/2/2012	$	979.42
261	7/2/2012	$	697.52
266	7/9/2012	$	1,149.88
267	7/9/2012	$	1,247.71
268	7/9/2012	$	1,467.13
269	7/9/2012	$	576.54
273	7/18/2012	$	494.28
274	7/18/2012	$	465.84
275	7/18/2012	$	410.00
276	7/18/2012	$	464.14
277	7/18/2012	$	299.10
278	7/18/2012	$	410.00
282	7/23/2012	$	568.44
283	7/23/2012	$	637.10
284	7/23/2012	$	416.20
285	7/23/2012	$	445.78
286	7/23/2012	$	580.90
287	7/23/2012	$	490.32
289	7/30/2012	$	602.60
290	7/30/2012	$	525.30

291	7/30/2012	$	567.70
292	7/30/2012	$	538.10
293	7/30/2012	$	637.10
294	7/30/2012	$	448.00
295	7/30/2012	$	405.60
296	7/30/2012	$	430.94
297	7/30/2012	$	593.80
298	7/30/2012	$	410.00
299	8/6/2012	$	448.00
300	8/6/2012	$	291.60
301	8/6/2012	$	360.16
302	8/6/2012	$	875.76
303	8/6/2012	$	533.12
304	8/6/2012	$	483.80
305	8/13/2012	$	468.94
306	8/13/2012	$	557.76
307	8/13/2012	$	404.70
308	8/13/2012	$	437.40
310	8/20/2012	$	430.94
311	8/27/2012	$	551.40
312	9/4/2012	$	372.00
313	9/4/2012	$	372.91
314	9/4/2012	$	570.70
315	9/4/2012	$	444.90
316	9/4/2012	$	410.00
317	9/10/2012	$	397.28
318	9/10/2012	$	543.08
319	9/10/2012	$	483.80
320	9/10/2012	$	440.50
321	9/10/2012	$	503.84
322	9/17/2012	$	377.86
323	9/17/2012	$	320.04
324	9/17/2012	$	428.61

325	9/17/2012	$	577.16
326	9/17/2012	$	392.94
327	9/24/2012	$	945.50
328	9/24/2012	$	464.80
329	9/24/2012	$	589.41
330	9/24/2012	$	1,021.51
331	9/24/2012	$	1,059.51
332	9/24/2012	$	366.70
333	10/1/2012	$	583.20
334	10/1/2012	$	392.94
335	10/1/2012	$	372.00
336	10/1/2012	$	320.04
337	10/1/2012	$	406.90
338	10/1/2012	$	430.94
339	10/8/2012	$	550.50
340	10/8/2012	$	385.94
341	10/8/2012	$	777.60
342	10/8/2012	$	583.20
343	10/8/2012	$	777.60
344	10/8/2012	$	583.20
349	10/15/2012	$	583.20
350	10/15/2012	$	583.20
351	10/15/2012	$	1,360.80
352	10/15/2012	$	777.60
364	10/22/2012	$	583.20
365	10/22/2012	$	583.20
366	10/22/2012	$	777.60
367	10/22/2012	$	777.60
368	10/22/2012	$	777.60
374	10/29/2012	$	583.20

375	10/29/2012	$	583.20
376	10/29/2012	$	583.20
377	10/29/2012	$	583.20
378	10/29/2012	$	583.20
381	11/5/2012	$	583.20
382	11/5/2012	$	583.20
383	11/5/2012	$	291.60
384	11/5/2012	$	291.60
385	11/5/2012	$	291.60
386	11/5/2012	$	291.60
387	11/5/2012	$	583.20
401	11/12/2012	$	583.20
402	11/12/2012	$	291.60
403	11/12/2012	$	437.40
404	11/12/2012	$	583.20
405	11/12/2012	$	339.59
406	11/12/2012	$	339.59
		$	**90,982.05** x
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DPW

Street Handwritten
Invoice Number

16343	5/12/2012	$ 1,555.20
16344	5/12/2012	$ 1,360.80
16345	5/12/2012	$ 1,215.00
16346	5/12/2012	$ 1,378.39
16335	5/5/2012	$ 1,562.86
16315	4/21/2012	$ 1,303.40
16322	4/28/2012	$ 1,576.22
16334	5/5/2012	$ 1,215.00
16332	5/5/2012	$ 1,652.40
16333	5/5/2012	$ 1,773.90
16328	4/28/2012	$ 1,749.60
16329	4/28/2012	$ 1,360.80
16313	4/21/2012	$ 1,744.60
16314	4/21/2012	$ 1,360.80
16308	4/14/2012	$ 1,134.00
16310	4/14/2012	$ 1,489.71
16309	4/14/2012	$ 1,949.00
	2012	**$ 25,381.68** x
14649	10/29/2011	$ 1,944.00
14650	10/29/2011	$ 1,620.00
16155	9/10/2011	$ 972.00
16188	9/30/2011	$ 501.45
16021	7/16/2011	$ 1,350.00
15998	7/9/2011	$ 1,755.00
15999	7/9/2011	$ 918.00
16000	7/9/2011	$ 874.92
15961	6/25/2011	$ 1,447.96

15958	6/25/2011	$	1,998.00	
15756	4/16/2011	$	1,836.00	
15757	4/16/2011	$	1,944.00	
15758	4/11/2011	$	1,966.50	
	2011	**$**	**19,127.83**	x

15506	10/16/2010	$	1,134.00	
15505	10/16/2010	$	1,512.00	
	2010	**$**	**2,646.00**	x

14362	6/6/2009	$	1,654.18	
14386	6/13/2009	$	1,724.32	
14408	6/20/2009	$	432.54	
14422*	6/27/2009	$	758.70	
14468	7/18/2009	$	972.00	
14469	7/18/2009	$	401.33	
14534	8/17/2009	$	226.15	
	2009	**$**	**6,169.22**	x

GSD

Park Electronic

Invoice Number	Date		Total Due	
203	5/23/2012	$	1,082.14	
212	5/30/2012	$	800.50	
253	6/25/2012	$	1,102.54	
252	6/25/2012	$	1,203.72	
265	7/2/2012	$	1,344.59	
262	7/2/2012	$	756.78	
272	7/9/2012	$	642.70	
271	7/9/2012	$	549.23	
280	7/18/2012	$	364.50	
281	7/23/2012	$	704.56	
288	7/30/2012	$	553.60	
	2012	**$**	**9,104.86**	x

Park Handwritten

Invoice Number

16395	5/18/2012	$	656.00	
	2012	$	656.00	x
16002	7/7/2011	$	699.84	
15755	4/14/2011	$	755.52	
15754	4/14/2011	$	1,944.00	
15753*	4/12/2011	$	1,944.00	
15752	4/16/2011	$	891.00	
15747	4/16/2011	$	1,960.00	
15746	4/16/2011	$	1,512.00	
15745	4/16/2011	$	1,944.00	
15744	4/16/2011	$	1,944.00	
	2011	$	13,594.36	x
14990	4/22/2010	$	1,040.00	
15263	7/16/2010	$	772.90	
	2010	$	1,812.90	x
		$	**16,063.26**	

Police

Invoice Number

379	10/29/2012	$	437.40		
380	10/29/2012	$	437.40		
	2012	$	874.80		
15951	6/22/2011	$	913.19	nc	
15950	6/22/2011	$	1,944.00	nc	
15751	4/15/2011	$	1,077.73	nc	
15750	4/15/2011	$	1,080.00	nc	
15749	4/14/2011	$	1,199.66	nc	
15748	4/14/2011	$	1,944.00	nc	n.c. total
	2011	$	8,158.58		$ 14,569.74
		$	**9,033.38**	x	

nc: no copy of invoice; hand delivered to GSD

Health Dept.

Invoice Number				
16147	9/2/2011	$	1,667.24	nc
16040	7/20/2011	$	673.92	nc
16225	10/13/2011	$	648.00	nc
	2011	$	2,989.16	
11723	5/22/2006	$	1,742.00	nc
11722	5/22/2006	$	1,680.00	nc
	2006	$	3,422.00	
nc: no copy of invoice; hand delivered to GSD		**$**	**6,411.16**	x

2013 Park

Invoice Number				
410	4/28/2013	$	573.20	
412	7/1/2012	$	329.90	
413	7/1/2013	$	1,400.89	
	2013	**$**	**2,303.99**	x

Check Stub ERROR	CK#				
		1/12/2010	**$**	**2,529.20**	x

See Invoices	>> #14520	incl. in total invoices	*attached*
	>> #14274	incl. in total invoices	*attached*
	>> Check Stub		*attached*

76 **2** **219**