

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

<p>In re: City of Detroit, Michigan, Debtor.</p>	<p>Bankruptcy Case No. 13-53846 Judge Thomas J. Tucker Chapter 9</p>
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**STIPULATION FOR ENTRY OF ORDER GRANTING ADJOURNMENT
OF HEARING ON 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 WITHOUT DATE AND SETTING MATTER FOR
STATUS CONFERENCE**

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, November 15, 2017 at 1:30 p.m., and the Court has set the deadline for the DFFA to file its reply brief as November 8, 2017 [Docket No. 12694].

4. The DFFA and the City have reached a settlement in principle with respect to the claim that is the subject of the Motion. The settlement is subject to and contingent on final and definitive settlement documents and the execution of the settlement documents.

5. The parties seek to adjourn the hearing on the Motion without date and respectfully request that in lieu of the hearing on the Motion, the Court hold a status conference to address certain issues related to the parties' settlement.

6. Smola has been provided notice of the terms of the settlement and of the hearing date, time, and location. The DFFA intends to serve Smola with a copy of the settlement documents and with a copy of any order this Court enters pursuant to this Stipulation.

7. Smola has indicated his intention to appear at the hearing.

WHEREFORE, the Parties respectfully request that the Court enter an order adjourning the hearing on the Motion without date and rescheduling the matter for a status conference on November 15, 2017 at 1:30 p.m., the time currently set for the hearing on the Motion, in substantially the same form as the proposed order attached as Exhibit 1.

STIPULATED AND AGREED TO ON November 3, 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**

<p>In re: City of Detroit, Michigan, Debtor.</p>	<p>Bankruptcy Case No. 13-53846 Judge Thomas J. Tucker Chapter 9</p>
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**ORDER GRANTING ADJOURNMENT OF HEARING ON 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 WITHOUT DATE AND
SETTING MATTER FOR STATUS CONFERENCE**

Upon the Stipulation for Order Granting Hearing on 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") Without Date and Setting Matter for Status Conference; and the Court being otherwise advised in the premises;

IT IS ORDERED THAT the hearing on the Motion now set for November 15, 2017 at 1:30 p.m. is adjourned without date;

IT IS FURTHER ORDERED THAT the parties shall appear on November 15, 2017 at 1:30 p.m. for a status conference.