

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

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| <p>In re:</p> <p>City of Detroit, Michigan,</p> <p style="text-align: center;">Debtor.</p> | <p>Bankruptcy Case No. 13-53846</p> <p>Judge Thomas J. Tucker</p> <p>Chapter 9</p> |
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**STIPULATION WITHDRAWING DEBTOR'S OBJECTION TO
PROOF OF CLAIM NUMBER 530 OF CLAIMANT IRA LEE TODD, JR.**

Ira Lee Todd, Jr., the claimant ("Claimant"), and the City of Detroit, Michigan ("City"), by and through their undersigned counsel, stipulate and agree as follows in support of the entry of the Order Withdrawing Debtor's Objection to Claim No. 530 filed by the Claimant, attached hereto as Exhibit 1.

1. Ira Lee Todd, Jr., filed Claim Number 530, on January 13, 2014.
2. Claim No. 530 asserts a claim against the City in the amount of \$3,297,471.00, and is based on an alleged violation of Michigan's Whistleblower Protection Act.
3. On July 31, 2008, the Claimant filed a lawsuit against the City in the Third Judicial Circuit Court in Wayne County, Michigan, captioned *Todd v. Kilpatrick*, Case No. 08-119322 (the "State Court Case"), based upon the facts and circumstances asserted in Claim No. 530.
4. The State Court Case was subsequently settled, and the state court entered an order of dismissal on September 20, 2017. In that regard, the City and



the Claimant entered into an *Agreement Resolving Claim of Ira Lee Todd, Jr.*, in September 2017, which settled Claim No. 503 as a \$500,000.00 general unsecured non-priority claim (“Settled Claim”). The Settled Claim will be subject to the treatment set forth in Class 14 Other Unsecured Claims of the City’s *Eighth Amended Plan of the Adjustment of Debts of the City of Detroit* [Doc. No. 8045].

5. The City objected to Claim No. 530 in the *Debtor’s Fifth-Fifth Omnibus Objection to Certain Claims* [Doc. No. 12760] filed on March 28, 2018 (the “Objection”).

6. The City and the Claimant agree that Claim No. 530 has been resolved, and the City’s objection should therefore be withdrawn as moot.

WHEREFORE, the City and the Claimant respectfully request that the Court enter an order in the form attached as Exhibit 1 hereto.

Respectfully submitted,

By: /s/ Marc N. Swanson

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) 496-8451

green@millercanfield.com

swansonm@millercanfield.com

ATTORNEYS FOR THE CITY OF DETROIT

By: /s/ Michael L. Stefani

Michael L. Stefani (P20938)

STEFANI & STEFANI, P.C.

512 E. 11 Mile Road

Royal Oak, MI 48067

Telephone: (248) 544-3400

Facsimile: (248) 544-3403

mike@stefani-law.com

ATTORNEYS FOR IRA LEE TODD, JR.

Dated: May 16, 2018

[EXHIBIT 1]

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**ORDER WITHDRAWING DEBTOR'S OBJECTION TO
PROOF OF CLAIM NUMBER 530 OF CLAIMANT IRA LEE TODD, JR.**

Upon the *Stipulation Withdrawing Debtor's Objection to Proof of Claim Number 530 of Claimant Ira Lee Todd, Jr.* [Doc. No. ____] submitted by the City of Detroit (the "City") and Claimant Ira Lee Todd, Jr., the holder of Claim Number 530, for entry of an order withdrawing the Debtor's objection as to Claim Number 530; and the Court being fully advised in the premises,

IT IS ORDERED that:

1. The City's objection to Claim Number 530 is withdrawn as moot.