Docket #13142 Date Filed: 10/16/2019

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
)	

THIRD STIPULATION FOR EXTENSION OF FILING RESPONSE TO CITY OF DETROIT MOTION, DOCKET No. 13126, FOR CLAIMANTS AFSCME (CLAIM NUMBER 2958) AND THE **COALITION OF DETROIT UNIONS (CLAIM NUMBER 2851)**

The City of Detroit, Michigan ("City"), AFSCME Council 25 and Its Affiliated Detroit Locals, on behalf of themselves and their affiliated locals, officers, agents, employees and members ("AFSCME") and the Coalition of Detroit Unions, on behalf of itself and its members and their officers, agents, employees and members ("Coalition") stipulate and agree as follows:

- 1. On September 17, 2019, the City of Detroit filed a motion concerning the implementation of distributions of certain B Notes to holders of allowed Class 14 claims, for the City's Plan of Adjustment.
- 2. Claimants AFSCME and the Coalition have two separate allowed claims, which are entitled to B Notes, pursuant to an Order of this Court.

3. The parties seek to have the date for the response to this motion extended to October 30, 2019 for these Claimants, in order to allow time for the Claimants and the City to attempt to work out and prepare a stipulated order concerning certain issues of distribution of the B Notes to these Claimants.

Dated: October 16, 2019 CITY OF DETROIT LAW DEPARTMENT

By: /s/ Charles N. Raimi
Charles N. Raimi (P29746)
Mary Beth Cobb (P40080)
James Noseda (P52563)
Attorney for the City of Detroit
2 Woodward Avenue, Ste. 500
Detroit, Michigan 48226
(313) 224-4550
raimic@detroitmi.gov

Dated: October 16, 2019 CITY OF DETROIT

By: /s/ Marc N. Swanson
Marc N. Swanson (P71149)
MILLER CANFIELD
Attorney for City of Detroit
150 West Jefferson, Ste. 2500
Detroit, Michigan 48226
(313) 963-6420

swansonm@millercanfield.com

Dated: October 16, 2019 By: /s/ Richard G. Mack, Jr.

Richard G. Mack, Jr. Miller Cohen, PLC

Attorney for Claimant AFSCME 600 West Lafayette Blvd., 4th Floor

Detroit Michigan 48226

(313) 964-4454

richardmack@millercohen.com

Dated: October 16, 2019 By: /s/ Richard G. Mack, Jr.

Richard G. Mack, Jr. Miller Cohen, PLC Attorney for Claimant Coalition 600 West Lafayette Blvd., 4th Floor Detroit Michigan 48226 (313) 964-4454

richardmack@millercohen.com

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

THIRD ORDER APPROVING STIPULATION FOR EXTENSION OF FILING RESPONSE TO CITY OF DETROIT MOTION, DOCKET No. 13126, FOR CLAIMANTS AFSCME (CLAIM NUMBER 2958) AND THE COALITION OF DETROIT UNIONS (CLAIM NUMBER 2851)

This matter having come before the Court on the Stipulation Between the City of Detroit, AFSCME Council 25 and Its Affiliated Detroit Locals, and the Coalition of Detroit Unions for Entry of an Order Approving an Extension of Time for Claimants' filing of response to City Motion concerning a process for the implementation of distributions of B Notes (Docket No 13126) ("Stipulation", Docket No. **), the Court being fully advised in the premises, and there being good cause to grant the relief requested, and the Court finding that the proposed stipulation is fair and equitable and is in the best interest of the City, AFSCME and the Coalition, and other creditors of the City,

IT IS HEREBY ORDERED THAT:

- 1. The Stipulation is approved as set forth in this Order.
- 2. AFSCME may respond to the City's Motion at Docket No. 13126, on or before October 30, 2019.
- 3. The Coalition may respond to the City's Motion at Docket No. 13126, on or before October 30, 2019.