

**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

**STIPULATION BY AND AMONG THE CITY OF DETROIT, MICHIGAN,
JESSICA BROWN AND STEPHANIE BROWN FOR
ORDER SPLITTING CLAIM NO. 1221**

The City of Detroit, Michigan (“City”) and Jessica Brown (“J. Brown”), and Stephanie Brown (“S. Brown” and together with J. Brown, the “Claimants”; and collectively with the City and J. Brown, the “Parties”) stipulate and agree as follows:

1. On February 20, 2014, the Claimants filed Claim No. 1221 in the amount of \$500,000 (“Claim 1221”).
2. Claim 1221 was filed based on a settlement agreement between Claimants and the City to resolve a civil lawsuit Claimants filed against the City in state court.
3. Claim 1221 was filed on behalf of more than one party.
4. On May 15, 2014, Claimants and the City executed that certain Agreement Resolving Claims[s] of Jessica Brown and Stephanie Brown (“Settlement Agreement”).



5. Paragraph 2 of the Settlement Agreement provides that Claim 1221 is “deemed amended, modified and allowed as a general unsecured, non-priority claim” in the amount of \$30,000.

6. For distribution purposes, the City’s claim agent cannot process distributions to two parties for one claim.

7. The Parties stipulate and agree as follows:

- a. Claim 1221 will remain an allowed Class 14 Other Unsecured Claim, owned by J. Brown, in the amount of \$15,000.
- b. A new claim will be issued in the name of S. Brown in the amount of \$15,000 (“New Claim”).
- c. The New Claim and Claim 1221 will be allowed and treated as Class 14 Other Unsecured Claims under the *Eighth Amended Plan for the Adjustment of Debts* filed at docket number 8045 (“Plan”).

8. The sum of the proposed proofs of claim equals the amount allowed for Claim 1221 by the Settlement Agreement. The City takes no position on the validity of the split.

9. The parties request the Court enter the order in the form attached hereto as Exhibit 1, modifying Claim 1221 and allowing a new Class 14 Other Unsecured Claim owned by S. Brown.

STIPULATED AND AGREED AS TO FORM AND CONTENT:

MILLER, CANFIELD, PADDOCK
AND STONE, PLC

For the City of Detroit, Michigan

By: /s/ Marc N. Swanson

Marc N. Swanson (P71149)

150 West Jefferson, Suite 2500

Detroit, MI 48226

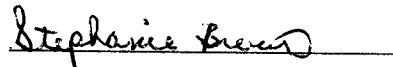
(313) 496-7591

swansonm@millercanfield.com

JESSICA BROWN

A handwritten signature in black ink, appearing to read 'JB', written over a horizontal line.

STEPHANIE BROWN

A handwritten signature in black ink, appearing to read 'Stephanie Brown', written over a horizontal line.

Dated: June 16, 2020

Exhibit 1

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

In re:

City of Detroit, Michigan,

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Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**[PROPOSED] ORDER APPROVING THE STIPULATION BY AND
AMONG THE CITY OF DETROIT, MICHIGAN, JESSICA BROWN AND
STEPHANIE BROWN FOR ORDER SPLITTING CLAIM NO. 1221**

This matter having come before the Court on the *Stipulation by and Among the City of Detroit, Michigan, Jessica Brown and Stephanie Brown for Order Splitting Claim No. 1221*,¹ the Court having reviewed the stipulation and being otherwise apprised of the matter, and there being good cause, NOW THEREFORE IT IS ORDERED THAT

1. The stipulation is approved to the extent set forth in this Order.
2. Claim number 1221 is owned by Jessica Brown in the reduced amount of \$15,000. Claim number 1221 shall be treated in accordance with Class 14 of the Plan.
3. A new Class 14 Other Unsecured Claim is allowed under the Plan in the amount of \$15,000, owned by Stephanie Brown, and the City's claim agent

¹ Capitalized terms not otherwise defined in this order shall have the meanings ascribed to them in the Stipulation.

will assign a new claim number for this claim (“New Claim”). The New Claim shall be treated in accordance with Class 14 of the Plan.

4. The City’s claims agent is authorized to update the claims register accordingly.