Docket #13322 Date Filed: 11/17/2020

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re: Bankruptcy Case No. 13-53846 City of Detroit, Michigan, Judge Thomas J. Tucker Debtor. Chapter 9

STIPULATION REGARDING HEARING ON CITY OF DETROIT'S **OBJECTION TO CLAIM NUMBER 1862 FILED BY DETROIT POLICE OFFICERS' ASSOCIATION**

The City of Detroit, Michigan ("City") and the Detroit Police Officers Association ("DPOA"), by their undersigned counsel, hereby stipulate and agree as follows:

- On October 29, 2019, the City filed the City of Detroit's Objection to 1. Claim Number 1862 Filed by Detroit Police Officers' Association [Doc. No. 13152] ("Objection").
- 2. On December 11, 2019, the DPOA filed a response to the Objection. [Doc. No. 13193].
 - The Court conducted a hearing on the Objection on February 12, 2020. 3.
- 4. The Court scheduled a further hearing on the Objection, for the purpose of issuing an oral bench opinion, on March 25, 2020.
- On March 24, 2020, the hearing was adjourned to April 29, 2020. [Doc. 5. No. 13273].

6. The Court has since conducted a few status conferences on the

Objection, including a status conference on September 16, 2020.

7. Since the last status conference on September 16, 2020, the parties have

made substantial progress toward entering into a binding agreement but have not yet

finalized the motion and proposed order. The current version of the motion and order

contemplates that the DPOA will retain an institutional investment bank, a qualified

broker/dealer and an experienced claims administrator to address the distribution of

the class 14 claim to the applicable members of the DPOA. The City recently

provided extensive comments to the motion and drafted a proposed order. The

parties anticipate that the motion and order will be finalized in the next 30 days and

respectfully request that the Court adjourn the status conference to December 16,

2020 at 1:30 pm.

WHEREFORE, the City and the DPOA respectfully request that the Court

enter an order in substantially the same form as the one attached as Exhibit 1

adjourning the status conference to December 16, 2020.

STIPULATED AND AGREED TO ON November 17, 2020:

By: /s/ Barbara A. Patek

Barbara A. Patek, Esq.

Attorney for Creditor – DPOA

24 E. Flint Street, Suite 2

Lake Orion, MI 48362

(248) 814-9470

pateklaw@gmail.com

By: /s/ Marc N. Swanson

Marc N. Swanson (P71149)

Attorney for Debtor – City of Detroit

150 West Jefferson, Suite 2500

Detroit, MI 48226

(313) 496-7591

swansonm@millercanfield.com

EXHIBIT 1

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:	Bankruptcy Case No. 13-53846
City of Detroit, Michigan,	Judge Thomas J. Tucker
Debtor.	Chapter 9

ORDER RESCHEDULING HEARING ON CITY OF DETROIT'S OBJECTION TO CLAIM NUMBER 1862 FILED BY DETROIT POLICE OFFICERS' ASSOCIATION

Upon the Stipulation Regarding Hearing on City of Detroit's Objection to Claim Number 1862 Filed by Detroit Police Officers' Association (Docket #______, the "Stipulation")¹; the Court finds good cause to enter this Order.

IT IS ORDERED that the Court will hold a status conference on the Objection on **December 16, 2020, at 1:30 p.m.**

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