

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

	X	
	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Thomas J. Tucker
Debtor	:	
	X	

**STIPULATION FOR ENTRY OF ORDER REGARDING
CLAIM NO. 1437 OF WADE TRIM ASSOCIATES INC.**

Wade Trim Associates Inc. (“Wade Trim”) and the City of Detroit, Michigan (the “City”), by and through the undersigned, stipulate as follows in support of the entry of the *Order Regarding Claim No. 1437 Of Wade Trim Associates Inc.* attached hereto as **Exhibit 1**.

1. On February 19, 2014, Wade Trim filed its proof of claim [Claim No. 1437] (the “Claim”) in the amount of \$69,704.29.

2. In resolution of Wade Trim’s Claim, the parties have agreed that: (a) the City will pay \$20,900.72 to Wade Trim, (b) the remainder of the Claim will be allowed as a general unsecured claim in the reduced amount of \$31,931.53 and (c) Wade Trim has no other claims against the City, whether for the pre-petition or post-petition periods.

3. Nothing in this stipulation is to be construed as a waiver of any of the City’s rights to assert and pursue any claims against Wade Trim, including, without limitation, claims under chapter 5 of the Bankruptcy Code.

WHEREFORE the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** approving the parties’ stipulation.

Respectfully submitted by:

<p>WADE TRIM ASSOCIATES INC.</p> <p>By: <u>/s/ Ralph Picano (with consent)</u> Ralph Picano Wade Trim Associates Inc. 500 Griswold St. Ste. 2500 Detroit, MI 48226 Phone: (313) 961-3650 rpicano@wadetrim.com</p> <p><i>Representative for Wade Trim Associates Inc.</i></p>	<p>FOLEY & LARDNER, LLP</p> <p>By: <u>/s/ John A. Simon</u> John A. Simon (P61866) Tamar N. Dolcourt (P73425) Leah R. Imbrogno (P79384) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jsimon@foley.com tdolcourt@foley.com limbrogno@foley.com</p> <p><i>Counsel to the City of Detroit, Michigan</i></p>
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Dated: November 24, 2015

EXHIBIT 1: PROPOSED ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
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In re : Chapter 9
: :
CITY OF DETROIT, MICHIGAN, : Case No. 13-53846
: :
Debtor : Hon. Thomas J. Tucker
: :
----- X

ORDER REGARDING CLAIM NO. 1437 OF WADE TRIM ASSOCIATES INC.

This matter having come before the Court on the *Stipulation For Entry of Order Regarding Claim No. 1437 Of Wade Trim Associates Inc.* (the “Stipulation”); Wade Trim¹ having filed Claim No. 1437 (the “Claim”) in the above-captioned bankruptcy case; the parties having agreed that Claim No. 1437 should be resolved pursuant to the parties agreement in the Stipulation; and the Court being otherwise fully informed:

IT IS HEREBY ORDERED THAT:

1. The Stipulation is approved as provided herein.
2. The City shall pay \$20,900.72 to Wade Trim.
3. Claim No. 1437 of Wade Trim shall be allowed as a general unsecured claim in the reduced amount of \$31,931.53, which constitutes Wade Trim’s only outstanding claim in this bankruptcy, whether for the pre-petition or post-petition period.
4. The City’s claim’s agent is authorized to update the claims register accordingly.

¹ Capitalized terms not otherwise defined herein shall have the meaning given to them in the Stipulation.