

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

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

---

**STIPULATION FOR ORDER WITHDRAWING DPCOA  
CLAIM NOS. 1884 AND 3777 AS MOOT**

The City of Detroit, Michigan (“City”) and the Detroit Police Command Officers Association (“DPCOA”), by and through their undersigned counsel, hereby stipulate to and state the following with regard to the withdrawal of DPCOA Claim Nos. 1884 and 3777:

1. On February 20, 2014, the DPCOA filed Claim No. 1884.
2. Claim No. 1884 was filed during ongoing Court-ordered mediation between the City and the DPCOA in these Chapter 9 proceedings. Claim No. 1884 sought to preserve DPCOA members’ rights with respect to their terms and conditions of employment with the City.
3. On June 10, 2014, the DPCOA filed Claim No. 3777, which amended Claim No. 1884 for notice purposes only.
4. On June 18, 2014, the City and the DPCOA entered into a collective bargaining agreement (the “DPCOA CBA”) that was ratified by DPCOA members,

approved by the state and incorporated into the Plan of Adjustment [Docket No. 8045-10, p. 28]. The Plan of Adjustment was confirmed by this Court pursuant to its November 12, 2014 Order Confirming Eighth Amended Plan for the Adjustment of Debts of the City of Detroit [Docket No. 8272].

5. The City and the DPCOA agree that (a) the DPCOA CBA resolves the issues with respect to DPCOA members' terms and conditions of employment with the City, (b) Claim Nos. 1884 and 3777 should be withdrawn as moot, and (c) a result of the withdrawal of Claim Nos. 1884 and 3777, the DPCOA will have no right to receive any distribution in these bankruptcy proceedings based on Claim Nos. 1884 and/or 3777.

WHEREFORE, the parties request the Court enter an Order in the form attached hereto as Exhibit A.

STIPULATED AND AGREED:

*/s/ Barbara A. Patek*

Barbara A. Patek, Esq.  
Attorney for Creditor – DPCOA  
400 Galleria Officentre, Suite 444  
Southfield, MI 48034  
(248) 827-4100  
[bpatek@ermanteicher.com](mailto:bpatek@ermanteicher.com)

*/s/ Mary Beth Cobbs*

Mary Beth Cobbs (P40080)  
Attorney for Debtor – City of Detroit  
2 Woodward, Suite 500  
Detroit, MI 48226  
(313) 237-3075

-and-

-and-

*/s/ Mary Ellen Gurewitz*

Mary Ellen Gurewitz (P25724)  
2211 E. Jefferson Avenue, Suite 200  
Detroit, MI 48207  
(313) 965-3464

*/s/ Letitia C. Jones*

Letitia C. Jones (P52136)  
Attorney for Debtor – City of Detroit  
2 Woodward, Suite 500  
Detroit, MI 48226  
(313) 237-3002

February 4, 2016

