

3. Among the Pre-petition Discipline Matters that are the subject of Claim No. 1878 are disciplinary actions dismissing Tonya Hughes, Donald Johnson and Victor Jones from the City of Detroit Police Department.
4. The parties agree that the Pre-petition Discipline Matter involving Tonya Hughes was rendered moot upon the issuance of a final and binding arbitration award, upholding the dismissal.
5. The parties agree that the Pre-petition Discipline Matter involving Donald Johnson was rendered moot upon notice of his filing for retirement
6. The parties agree that the Pre-petition Discipline Matter involving Victor Jones was rendered moot upon notice of his filing for retirement.
7. The City and the DPLSA, agree that (a) the Pre-petition Discipline Matters against Tonya Hughes, Donald Johnson and Victor Jones have been rendered moot; (b) Claim No. 1878 should be withdrawn as moot; and (c) as a result of the withdrawal of Claim No. 1878, the DPLSA and its affected members will have no right to receive any distribution in these bankruptcy proceedings based on Claim No. 1878.
8. The withdrawal of DPLSA Claim No. 1878 (and ostensibly Claim No. 3784 filed for notice purposes only) does not affect any rights that DPLSA has under any other pending claim.

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

STIPULATED AND AGREED:

DPLSA ATTORNEYS

/s/ Barbara A. Patek
Barbara A. Patek (P34666)
Law Office of Barbara A Patek, PLC
27 E Flint Street, Suite 2
Lake Orion, MI 48362-3220
p. (248) 814-9470
f. (248-814-8231
pateklaw@gmail.com

-and-

Peter Sudnick (P30768)
Sudnick Law, PC.
2555 Crooks Rd, Suite 150
Troy, MI 48084
(248) 643-8533

CITY OF DETROIT ATTORNEYS

/s/ Mary Beth Cobbs
Mary Beth Cobbs (P40080)
City of Detroit Law Department
2 Woodward, Suite 500
Detroit, MI 48226
(313) 237-3075
(313) 224-5505
cobbm@detroitmi.gov

-and-

Letitia C. Jones (P52136)
City of Detroit Law Department
2 Woodward, Suite 500
Detroit, MI 48226
(313) 237-3002

Exhibit A

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

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

ORDER WITHDRAWING
DPLSA CLAIM #1878 AS MOOT

This case is before the Court on the stipulation filed on _____ (Docket # _____, the Stipulation) entitled “Stipulation for Order Withdrawing DPLSA Claim #1878 as Moot.” Based on the Stipulation,

IT IS ORDERED THAT Claim No. 1878 filed on behalf of the Detroit Police Lieutenants and Sergeants Association is withdrawn as moot.

Signed on: _____

Thomas J. Tucker
U.S. Bankruptcy Court Judge