

**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
	)	
	)	
	)	

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**STIPULATION FOR ENTRY OF ORDER  
MODIFYING THE MOTION AND BRIEFING SCHEDULE  
IN THE COURT’S MAY 29, 2015  
ORDER REGARDING FURTHER PROCEEDINGS ON THE CITY OF  
DETROIT’S OBJECTIONS TO PROOF OF CLAIM NUMBER 2581 FILED  
BY THE COALITION OF DETROIT UNIONS, AND TO THE PROOF OF  
CLAIM NUMBER 2958 FILED BY MICHIGAN AFSCME COUNCIL 25  
AND ITS AFFILIATED DETROIT LOCALS [Doc. No. 9900]**

The Coalition Of Detroit Unions, Michigan AFSCME Council 25 And Its Affiliated Detroit Locals and the City of Detroit (“parties”) hereby stipulate to, and respectfully request that this Court enter, an order modifying the motion and briefing schedule in the Court’s May 29, 2015 *Order Regarding Further Proceedings*. The parties are engaged in productive discussions toward agreement on a mediation and settlement process and need a short additional time period to finalize their agreement. In support, the parties state as follows:

1. The parties appeared before the Court on May 27, 2015 on a scheduled Status Conference regarding the *City Of Detroit And AFSCME Council*

*25 And The Coalition Of Detroit Unions Joint Status Report In Connection With Objections To Proof Of Claim Numbers 2968 And 258 (Doc.No. 9851 “Joint Report”)*1.<sup>1</sup>

2. Following the Status Conference, the Court issued a briefing schedule on motions for summary judgment to be filed by the City of Detroit and related matters in its May 29, 2015 *Order Regarding Further Proceedings On The City Of Detroit’s Objections To Proof Of Claim Number 2581 Filed By The Coalition Of Detroit Unions, And To The Proof Of Claim Number 2958 Filed By Michigan AFSCME Council 25 And Its Affiliated Detroit Locals* (“Order”) [Doc. No. 9900]

3. The Order requires the City to file its motions on July 31, 2015, with responses by AFSCME and the Coalition due September 30, 2015.

4. However, as urged by the Court at the Status Conference, the parties have been in serious discussion of alternatives approaches to resolution of the AFSCME and Coalition Claims.

5. The discussions between the parties have been positive and productive and the parties have now agreed in principle to a final and binding mediation process.

6. The parties are now reviewing a draft written Mediation Agreement to govern the process of mediation, but require some additional time to finalize the

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<sup>1</sup> The Proof of Claim Number is 2851 and not 2581.

details of the agreement. The parties seek to end all litigation and substitute final and binding mediation on Proof of Claim Number 2851 Filed by the Coalition of Detroit Unions and the subclaims of AFSCME Proof of Claim Number 2958 currently before this Court .

7. The parties therefore ask this Court to modify the current motion and briefing schedule in the Court's May 29, 2015 *Order Regarding Further Proceedings* as follows, and as embodied in the accompanying proposed Order:

A. The filing date in Paragraph 2 of the Order hereby adjourned from July 31, 2015 to September 31, 2015.

B. The filing date in Paragraph 3 of the Order is hereby adjourned from September 31, 2015 to November 31, 2015.

C. The filing date in Paragraph 4 of the Order is hereby adjourned from October 30, 2015 to December 31, 2015.

D. The filing date in Paragraph 6 of the Order is hereby adjourned from August 14, 2015 to October 14, 2015.

SO STIPULATED:

/s/ Richard G. Mack

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ATTORNEYS FOR THE CITY

DATED: July 17, 2015

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

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	)	Chapter 9
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CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
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**ORDER MODIFYING THE COURT’S MAY 29, 2015 ORDER  
REGARDING FURTHER PROCEEDINGS ON THE CITY OF DETROIT’S  
OBJECTIONS TO PROOF OF CLAIM NUMBER 2581 FILED BY THE  
COALITION OF DETROIT UNIONS, AND TO THE PROOF OF CLAIM  
NUMBER 2958 FILED BY MICHIGAN AFSCME COUNCIL 25 AND ITS  
AFFILIATED DETROIT LOCALS**

This matter having come before the Court on the Parties’ Stipulation For Entry Of Order Adjourning Summary Judgment Schedule in the Court’s May 29, 2015 Order Regarding Further Proceedings On The City Of Detroit’s Objections To Proof Of Claim Number 2581 Filed By The Coalition Of Detroit Unions, And To The Proof Of Claim Number 2958 Filed By Michigan AFSCME Council 25 And Its Affiliated Detroit Locals,

**IT IS ORDERED THAT:**

1. The Court’s May 29, 2015 Order Regarding Further Proceedings On The City Of Detroit’s Objections To Proof Of Claim Number 2581 Filed By The

Coalition Of Detroit Unions, And To The Proof Of Claim Number 2958 Filed By Michigan AFSCME Council 25 And Its Affiliated Detroit Locals [Doc. No. 9900] (“Order”) is hereby Modified as Follows:

A. The filing date in Paragraph 2 of the Order is hereby adjourned from July 31, 2015 to September 31, 2015.

B. The filing date in Paragraph 3 of the Order is hereby adjourned from September 31, 2015 to November 31, 2015.

C. The filing date in Paragraph 4 of the Order is hereby adjourned from October 30, 2015 to December 31, 2015.

D. The filing date in Paragraph 6 of the Order is hereby adjourned from August 14, 2015 to October 14, 2015.

E. All references in the order to Proof of Claim Number 2581 shall be replaced with Proof of Claim Number 2851.