

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

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: :  
In re : Chapter 9  
: :  
CITY OF DETROIT, MICHIGAN, : Case No. 13-53846  
: :  
Debtor. : Hon. Steven W. Rhodes  
: :  
-----X

**STIPULATION FOR AN ORDER (I) CONTINUING  
HEARING ON OBJECTIONS TO CERTAIN CLAIMS FILED  
BY MICHIGAN AFSCME COUNCIL 25 AND ITS AFFILIATED  
DETROIT LOCALS AND THE COALITION OF DETROIT  
UNIONS AND (II) MODIFYING RELATED BRIEFING SCHEDULE**

The City of Detroit (the "City") and Michigan AFSCME Council 25 and its affiliated Detroit Locals ("AFSCME") and the Coalition of Detroit Unions (the "Coalition" and, collectively with the City and AFSCME, the "Parties"), by and through each of their undersigned counsel, stipulate as follows:

1. On February 21, 2014, AFSCME filed proof of claim number 2958 asserting liabilities against the City in the aggregate amount of not less than \$8,718,697,854.82 (the "AFSCME Claim").
2. Also on February 21, 2014, the Coalition, of which AFSCME is a member, filed proof of claim number 2851 asserting liabilities against the City in

the aggregate amount of \$242,586,116.50 (the "Coalition Claim" and, together with the AFSCME Claim, the "Claims").

3. On May 15, 2014, the City filed and served objections (together, the "Objections") to (a) the Coalition Claim (Docket No. 4874) and (b) the AFSCME Claim (Docket No. 4876).

4. The hearing on the Objections (the "Hearing") currently is scheduled for June 25, 2014, at 10:00 a.m., Eastern Time, and the deadline for AFSCME and the Coalition to respond to the Objections (the "Response Deadline") is June 18, 2014.

5. Subject to approval of the Court, the Parties have agreed that (a) the Hearing on the Objections shall be continued to the hearing reserved for claims objections scheduled for October 1, 2014 at 10:00 a.m., Eastern Time; (b) the Response Deadline with respect to AFSCME and the Coalition shall be extended to September 1, 2014; and (c) the City may file a reply to any response filed by AFSCME or the Coalition by no later than September 24, 2014.

The Parties, therefore, request that the Court enter the proposed Order attached hereto as Exhibit 1 approving this Stipulation.

Dated: June 18, 2014

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ATTORNEY FOR THE COALITION

**EXHIBIT 1**

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**ORDER (I) CONTINUING HEARING ON OBJECTIONS  
TO CERTAIN CLAIMS FILED BY MICHIGAN  
AFSCME COUNCIL 25 AND ITS AFFILIATED DETROIT  
LOCALS AND THE COALITION OF DETROIT UNIONS  
AND (II) MODIFYING RELATED BRIEFING SCHEDULE**

This matter came before the Court on the Stipulation for an Order (I) Continuing Hearing on Objections to Certain Claims Filed by Michigan AFSCME Council 25 and Its Affiliated Detroit Locals and the Coalition of Detroit Unions and (II) Modifying Related Briefing Schedule (the "Stipulation"),<sup>1</sup> filed by the City of Detroit (the "City"), Michigan AFSCME Council 25 and Its Affiliated Detroit Locals ("AFSCME") and the Coalition of Detroit Unions (the "Coalition" and, collectively with the City and AFSCME, the "Parties"); the Court having reviewed the Stipulation; the Court finding that (a) the Court has jurisdiction over

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<sup>1</sup> Capitalized terms not defined herein have the meanings given to them in the Stipulation.

this matter pursuant to 28 U.S.C. §§ 157 and 1334 and (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED.
2. The Hearing on the Objections hereby is continued to the hearing on claims objections scheduled for October 1, 2014, at 10:00 a.m., Eastern Time.
3. The Response Deadline hereby is be extended to September 1, 2014 with respect to AFSCME and the Coalition.
4. The City is authorized but not required to file a reply with respect to any response filed by AFSCME or the Coalition by no later than September 24, 2014 (the "Reply Deadline").
5. The relief granted herein is without prejudice to the right of the Parties to agree upon further modifications to the schedule regarding the Hearing on the Objections (and the related Response Deadline and Reply Deadline), subject to approval by the Court.

**CERTIFICATE OF SERVICE**

I, Heather Lennox, hereby certify that the foregoing Stipulation for an Order (I) Continuing Hearing on Objections to Certain Claims Filed by Michigan AFSCME Council 25 and Its Affiliated Detroit Locals and the Coalition of Detroit Unions and (II) Modifying Related Briefing Schedule was filed and served via the Court's electronic case filing and noticing system on this 18th day of June, 2014.

/s/ Heather Lennox \_\_\_\_\_