



**EXHIBIT A**

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

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**STIPULATION MODIFYING DEADLINE FOR THE OFFICIAL  
COMMITTEE OF RETIREES TO FILE ITS BRIEF IN SUPPORT  
OF CONFIRMATION OF THE CITY'S PLAN FOR  
THE ADJUSTMENT OF DEBTS**

This Stipulation is made by and among the City of Detroit (the "City") on the one hand and, on the other, the Official Committee of Retirees appointed in the above-captioned Chapter 9 case (the "Retiree Committee," and with the City, the "Parties"). By and through each of their undersigned counsel, the Parties have reached an agreement with respect to, and request the entry of an order approving, the following:

**RECITALS**

A. The City has reached an agreement in principle with the Committee regarding the treatment of "Pension Claims" and/or "OPEB Claims" (as such terms are defined in the Fourth Amended Plan for the Adjustment of Debts of the City of

Detroit (May 5, 2014) (Docket No. 4392) (the “Plan”))<sup>1</sup> as described in the Plan and/or the Disclosure Statement, provided that (1) both Classes 10 and 11 vote to accept the Plan (and, with respect to certain of the Non-City Parties, Class 12); and (2) the funding contemplated by the State Contribution Agreement and the DIA Settlement is actually committed, subject to the fulfillment of the conditions that accompany such funding (the “Funding Commitments”). Nothing herein is intended to alter, amend, or expand those agreements or agreements in principle.

B. The Parties executed a stipulation dated May 9, 2014 (the “Original Stipulation”) that modified certain deadlines established by this Court’s Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment (Docket No. 4202) (the “Fourth Amended Scheduling Order”). The Original Stipulation was approved by Order of the Court entered on May 9, 2014 (Docket No. 4587). The Original Stipulation contained dates for the Committee to file and serve various papers and pleadings, including objections to confirmation and expert reports, which dates varied depending on certain contingencies, namely (a) the “Funding Commitments” and (b) Classes 10, 11 and 12 support for the Plan.

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Plan, the Scheduling Orders or in the June Stipulation (defined below).

D. On June 9, 2014, the Court entered its Fifth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment (Docket No. 5259) (the "Fifth Amended Scheduling Order").

F. Pursuant to the First Amended Stipulation Modifying Certain Plan Discovery and Pleading Deadlines for Certain Non-Debtor Parties filed on June 20, 2014 [Docket No. 5473] (the "June Stipulation"), the Parties agreed that if on or before July 21, 2014, a tally of votes is filed in the Court showing that (a) Classes 10, 11, and 12 have voted to accept the Plan and (b) the Plan has not been materially modified to the detriment of Holders of Claims in Class 10, 11, or 12, then the Committee may file in Court its brief supporting confirmation on June 22, 2014, among other pleadings and reports. The Court entered an Order approving the Stipulation on June 20, 2014 [Docket No. 5482].

G. At present, voting on acceptance or rejection of the Plan by all creditor classes, including Classes 10, 11, and 12 has been substantially completed, but the outcome is not known. The official tally of such vote is scheduled to be filed with the Court on or before July 21, 2014. Assuming Classes 10, 11 and 12 have voted to accept the Plan, the Committee has requested an additional week to file a brief in support of confirmation of the Plan in order to properly address issues that have been raised by creditors and other parties, particularly as those issues arise under section 1129(b) of the Bankruptcy Code if one or more creditor

classes reject the Plan. The Committee also has requested the right to supplement the brief in support of confirmation if additional objections to the treatment of retirees claims are filed on or about August 5, 2014.

H. In addition, the City plans to file an amended Plan on or before July 20, 2014, which may include additional provisions that affect the Committee and the claims of the retirees.

I. In light of the above circumstances, the Parties have agreed to seek a revision of the deadline set forth in the June Stipulation to extend the Committee's time to file a brief in support of confirmation until July 29, 2014 and to provide the opportunity for the Committee to file a reply on August 8, 2014 to any supplemental objections to the treatment of retiree claims filed on or before August 5, 2014.

### **STIPULATION**

NOW, THEREFORE, it is hereby stipulated and agreed by and among the Parties, through their undersigned counsel:

1. The Committee may file and serve its brief in support of confirmation of the City's Plan on or before July 29, 2014.

2. The Committee may file and serve its brief in response to supplemental objections that are filed against retiree claims on or before August 8, 2014

3. The provisions of the Fifth Amended Scheduling Order and the June

Stipulation remain in full force and effect, except as modified by this Stipulation.

Dated: July 18, 2014

Respectfully submitted,

/s/ Carole Neville

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