

**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 REGARDING
WITHDRAWAL OF OBJECTIONS TO CONFIRMATION
OF PLAN OF ADJUSTMENT FILED BY (I) INTERNATIONAL
UNION, UAW AND (II) MICHIGAN AFSCME COUNCIL 25**

The City of Detroit, Michigan (the "City"), Michigan AFSCME Council 25 ("AFSCME") and the International Union, UAW (the "UAW" and, collectively with the City and AFSCME, the "Parties"), by and through each of their undersigned counsel, stipulate as follows:

1. In consideration of the City having filed its Eighth Amended Plan of Adjustment (Docket No. 8045), the UAW, AFSCME and the City stipulate to the entry of the proposed Order attached hereto as Exhibit 1 providing that all UAW and AFSCME objections to the City of Detroit Plan of Adjustment (Docket Nos. 6464 and 6468, respectively) are withdrawn with prejudice as to the City of Detroit only.

2. Accordingly, the Parties hereby request that the Court enter the proposed Order attached hereto, reflecting the Parties' agreement.

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Dated: October 27, 2014

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EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
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**ORDER REGARDING WITHDRAWAL
OF OBJECTIONS TO CONFIRMATION OF PLAN
OF ADJUSTMENT FILED BY (I) INTERNATIONAL
UNION, UAW AND (II) MICHIGAN AFSCME COUNCIL 25**

This matter coming before the Court on the Stipulation for an Order Regarding Withdrawal of Objections to Confirmation of Plan of Adjustment Filed by (I) International Union, UAW and (II) Michigan AFSCME Council 25 (the "Stipulation"),¹ filed jointly by the City of Detroit, Michigan (the "City"), Michigan AFSCME Council 25 ("AFSCME") and the International Union, UAW (the "UAW" 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 this matter pursuant to 28 U.S.C. §§ 157 and 1334 and (b) this is a

¹ Capitalized terms not otherwise defined herein have the meanings given to them in the Stipulation.

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. All objections to the City of Detroit Plan of Adjustment filed by the UAW and AFSCME (Docket Nos. 6464 and 6468, respectively) are withdrawn with prejudice as to the City of Detroit only.

CERTIFICATE OF SERVICE

I, Heather Lennox, hereby certify that the foregoing Stipulation for an Order Regarding Withdrawal of Objections to Confirmation of Plan of Adjustment Filed by (I) International Union, UAW and (II) Michigan AFSCME Council 25 was filed and served via the Court's electronic case filing and noticing system on this 27th day of October, 2014.

/s/ Heather Lennox