

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

	X	
	:	Chapter 9
IN RE	:	
	:	Case No. 13-53846
City Of Detroit, Michigan,	:	
	:	
DEBTOR	:	Hon. Steven W. Rhodes
	X	

**STIPULATION TO ALLOW CLAIM NO. 479 FILED BY GENE’S TOWING AS A
GENERAL UNSECURED CLAIM IN A REDUCED AMOUNT**

Gene’s Towing (“Gene’s”) and the City of Detroit, Michigan (the “Debtor”), by and through their undersigned counsel, state as follows in support of the entry of the *Order Allowing Claim No. 479 in a Reduced Amount* attached hereto as **Exhibit 1**.

1. On January 3, 2014, Gene’s filed a proof of claim [Claim No. 479] in the amount of \$50,905.00.
2. Upon discussion between the parties, Gene’s Towing has agreed that it received payments from the City in the amount of \$16,945.00, thereby reducing its claim to \$33,960.00.
3. Therefore, the parties have agreed to allow Claim No. 479 as a general unsecured claim in the amount of \$33,960.00, which constitutes the only pre-petition claim of Gene’s.

WHEREFORE the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** approving the parties’ stipulation.

Respectfully submitted by:

<p>FOLEY & LARDNER, LLP</p> <p>By: <u>/s/ Tamar N. Dolcourt</u> John A. Simon (P61866) Tamar N. Dolcourt (P73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jsimon@foley.com tdolcourt@foley.com <i>Counsel to the Debtor, City of Detroit Michigan</i></p> <p>Dated: November 7, 2014</p>	<p>By: <u>/s/ Nicholas J. Bachand (w/consent)</u> Nicholas J. Bachand (P67447) 2411 Vinewood Detroit, MI 48216 Office: 313-228-0860 Cell: 586-491-3372 Fax: 313-447-2158 attorneybachand@gmail.com</p> <p><i>Counsel to Gene's Towing</i></p>
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EXHIBIT 1

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

-----X	:	
IN RE	:	Chapter 9
	:	
City Of Detroit, Michigan,	:	Case No. 13-53846
	:	
DEBTOR	:	Hon. Steven W. Rhodes
-----X	:	

ORDER APPROVING STIPULATION TO ALLOW CLAIM NO. 479 AS A GENERAL UNSECURED CLAIM IN A REDUCED AMOUNT

This matter having come before the Court on the *Stipulation to Entry of Order Allowing Claim No. 479 as a General Unsecured Claim in a Reduced Amount* (the “Stipulation”); Gene’s¹ having filed Claim No. 479 in the above-captioned bankruptcy case; the parties having agreed that Claim No. 479 should be allowed as a general unsecured claim in a reduced amount; and the Court being otherwise fully informed:

IT IS HEREBY ORDERED THAT:

1. The Stipulation is approved.
2. Claim No. 479 filed by Gene’s shall be allowed as a general unsecured claim in the amount of \$33,960.00, which constitutes the only pre-petition claim of Gene’s.

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