# IN THE 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

STIPULATION RESOLVING HAAS & GOLDSTEIN, P.C.'S MOTION FOR RECONSIDERATION OR CLARIFICATION OF AMENDED OPINION REGARDING MOTIONS FILED BY THE CITY OF DETROIT, DATED APRIL 19, 2016

The City of Detroit ("<u>City</u>") and Hass & Goldstein, P.C. ("<u>Haas</u>"), stipulate and agree as follows:

- 1. On April 15, 2016, this Court entered its Order Regarding the City of Detroit's Motion for (I) Determination that the Goodman Acker and Haas & Goldstein Law Firms Have Violated the Plan of Adjustment by (A) Refusing to Honor an ADR Settlement and/or (B) Seeking Relief on a Pre-Petition Claim Beyond That Allowed by the Plan of Adjustment and (II) Order Enjoining Further Violations [Doc. No. 11091] ("Order").
- 2. On April 19, 2016, the Court issued an amended opinion regarding the Order. [Doc. No. 11098].
- 3. On May 3, 2016, Haas & Goldstein, P.C. filed its Motion for Reconsideration or Clarification of Amended Opinion Regarding Motions Filed by

the City of Detroit, Dated April 19, 2016 [Doc. No. 11142] ("Motion for Reconsideration").

- 4. On May 5, 2016, this Court entered an order requiring the City to respond to the Motion for Reconsideration by no later than May 19, 2016. [Doc. No. 11144].
- 5. Subject to this Court's approval, the parties have agreed to resolve the Motion for Reconsideration by removing paragraphs 2 and 3 from the Order and replacing them with

"Haas is ordered to dismiss its motion currently pending in the state court for penalty interest and attorney fees and is hereby enjoined from seeking those penalties in the action in which Haas represents Summit regarding care Summit provided to Ms. Sheila Williams (Summit Med. Grp. (Sheila Williams) v. City of Detroit, Wayne County Circuit Court No. 14-010025-NF, the "Summit(Williams) Action"). Haas is additionally enjoined from seeking state court relief regarding enforcement of any settlement in the Summit(Williams) Action, as this Court possesses exclusive jurisdiction in that regard. However, Haas and Summit are entitled to litigate the validity of Summit's claim for no-fault benefits in the Summit(Williams) Action."

6. Consequently, the parties respectfully request that the Court enter the proposed order attached as Exhibit 1.

### ATTORNEYS FOR THE CITY

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Dated: May 16, 2016

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#### EXHIBIT 1

## IN THE 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

ORDER GRANTING STIPULATION RESOLVING HAAS & GOLDSTEIN, P.C.'S MOTION FOR RECONSIDERATION OR CLARIFICATION OF AMENDED OPINION REGARDING MOTIONS FILED BY THE CITY OF DETROIT, DATED APRIL 19, 2016

Upon the Stipulation Resolving Haas & Goldstein, P.C.'s Motion for Reconsideration or Clarification of Amended Opinion Regarding Motions Filed by the City of Detroit, Dated April 19, 2016 (Dkt. No. [], "Stipulation"); and the Court being otherwise advised in the premises;

IT IS ORDERED THAT paragraphs 2 and 3 are removed from the Order Regarding the City of Detroit's Motion for (I) Determination that the Goodman Acker and Haas & Goldstein Law Firms Have Violated the Plan of Adjustment by (A) Refusing to Honor an ADR Settlement and/or (B) Seeking Relief on a Pre-Petition Claim Beyond That Allowed by the Plan of Adjustment and (II) Order Enjoining Further Violations [Doc. No. 11091] and replaced with: "Haas is ordered to dismiss its motion currently pending in the state court for penalty interest and attorney fees and is hereby enjoined from seeking those penalties in the action in

which Haas represents Summit regarding care Summit provided to Ms. Sheila Williams (*Summit Med. Grp. (Sheila Williams) v. City of Detroit*, Wayne County Circuit Court No. 14-010025-NF, the "Summit(Williams) Action"). Haas is additionally enjoined from seeking state court relief regarding enforcement of any settlement in the Summit(Williams) Action, as this Court possesses exclusive jurisdiction in that regard. However, Haas and Summit are entitled to litigate the validity of Summit's claim for no-fault benefits in the Summit(Williams) Action."