

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

In re: City of Detroit, Michigan, Debtor.
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Bankruptcy Case No. 13-53846  
Honorable Thomas J. Tucker  
Chapter 9

**STIPULATION FOR ORDER APPOINTING FACILITATOR**

The parties, by their attorneys, stipulate to the entry of the Order attached as Exhibit 1.

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DATED: June 23, 2016

**EXHIBIT 1**

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In re:

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**ORDER APPOINTING FACILITATOR**

The City of Detroit filed a motion for appointment of a facilitator. Now, therefore, upon stipulation of the parties, it is ordered as follows:

1. The Court hereby appoints E. R. Scales or other facilitator as mutually agreed to by the parties as facilitator to assist the parties in creating the VEBA contemplated by section 39.A of the collective bargaining agreement between the City of Detroit and AFSCME.

2. The parties shall not begin to utilize Mr. Scales' services until, at the earliest, August 5, 2016. During the period after entry of this Order until August 5, the parties agree to use their best efforts to create the VEBA without assistance of Mr. Scales. The parties agree to meet in person at least weekly for that purpose.

3. If Mr. Scales' services are required, the City and AFSCME shall share such costs equally.