

**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 FOR THE ENTRY OF AN ORDER MODIFYING THIS
COURT’S APRIL 29, 2016 ORDER (DOCKET NUMBER 11133)**

The City of Detroit, Michigan (“City”), AFSCME Council 25 and Its Affiliated Detroit Locals (“AFSCME”) and the Coalition of Detroit Unions (“Coalition”) stipulate and agree as follows:

A. On February 21, 2014, AFSCME filed proof of claim 2958 (“AFSCME Claim”) which was comprised of 20 components. On that same date, the Coalition filed proof of claim 2851 (“Coalition Claim”).

B. On May 29, 2015, this Court entered its Order Regarding Further Proceedings on the City of Detroit’s Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and Its Affiliated Detroit Locals (Doc. No. 9900).

C. On July 19, 2015, this Court entered the Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (Doc. No. 10071).

D. On September 30, 2015, this Court entered the Order Modifying Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (Doc. No. 10219).

E. On November 25, 2015, this Court entered the Order Modifying This Court's September 30, 2015 Order (Doc. No. 10286).

F. On January 29, 2016, this Court entered the Order Modifying This Court's November 25, 2015 Order (Doc. No. 10740).

G. On April 29, 2016, this Court entered the Order Modifying This Court's January 29, 2016 Order (Doc. No. 11133) ("Order").

After the entry of the Order, the parties continued their productive discussions regarding the resolution of the Coalition Claim and the AFSCME Claim. The parties have tentatively agreed to the terms of a complete settlement of the AFSCME Claim and the Coalition Claim. The City is in the process of

presenting the settlement to City Council for approval. The parties request that the Court provide the parties with an additional sixty days to obtain final approvals of the settlement documents.

NOW, THEREFORE, the City, AFSCME and the Coalition stipulate and agree as follows:

1. The filing deadlines in paragraph 1.A of the Order are extended from June 28, 2016 to August 29, 2016.

2. The filing deadlines in paragraph 1.B of the Order are extended from August 29, 2016 to October 28, 2016.

3. The filing deadlines in paragraph 1.C of the Order are extended from September 27, 2016 to November 28, 2016.

4. The filing deadlines in paragraph 1.D of the Order are extended from July 11, 2016 to September 9, 2016.

SO STIPULATED:

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ATTORNEYS FOR THE CITY

DATED: June 27, 2016

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**ORDER MODIFYING THIS COURT’S APRIL 29, 2016 ORDER
(DOCKET NUMBER 11133)**

This case is before the Court on the stipulation filed on June 20, 2016 entitled “Stipulation for the Entry of an Order Modifying this Court’s April 29, 2016 Order (Docket Number 11133)” (Docket # _____, the “Stipulation”).

Based on the Stipulation,

IT IS ORDERED THAT the Court’s April 29, 2016 Order entitled “Order Modifying This Court’s January 29, 2016 Order (Doc. No. 11133)” (the “Order”) is modified as follows:

5. The filing deadlines in paragraph 1.A of the Order are extended from June 28, 2016 to August 29, 2016.

6. The filing deadlines in paragraph 1.B of the Order are extended from August 29, 2016 to October 28, 2016.

7. The filing deadlines in paragraph 1.C of the Order are extended from September 27, 2016 to November 28, 2016.

8. The filing deadlines in paragraph 1.D of the Order are extended from July 11, 2016 to September 9, 2016.