## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION - Detroit

IN THE MATTER OF:

CITY OF DETROIT, MICHIGAN		Chapter 9
		Case No. 13-53846
Debtor.		Hon. Steven W. Rhodes
	/	

## STIPULATION FOR ORDER GRANTING LIMITED RELIEF FROM THE AUTOMATIC STAY AND FOR WAIVER OF PROVISIONS OF FED.R.BANKR.P. 4001 (a) (3)

P.P.T.A. Inc. and Harold Hoyt by and through their counsel, Osipov Bigelman, P.C. and Debtor, City of Detroit, Michigan, by and through counsel, Jones Day stipulate to the entry of the attached order granting relief from stay consistent with the terms of the attached order. The parties anticipate that this stipulation will allow P.P.T.A. Inc., Harold Hoyt, and their clients to file property tax appeals prior to the expiration of the statutory deadline on July 31, 2013. Relief is limited to permitting the filing of the appeals at this time.

#### **OSIPOV BIGELMAN, P.C.**

/s/ William C. Blasses
YULIY OSIPOV (P59486)
WILLIAM C. BLASSES (P73945)
Attorneys for P.P.T.A. Inc. and
Harold Hoyt
20700 Civic Center Drive, Suite 310
Southfield, MI 48076
(248) 663-1800
wcb@osbig.com, yo@osbig.com

July 31, 2013

### **JONES DAY**

/s/Heather Lennox (WCB w/consent)
HEATHER LENNOX (OH0059649)
Attorneys for City of Detroit, Michigan
901 Lakeside Avenue
Cleveland, OH 44114-1190
(216) 586-3939
hlennox@jonesday.com

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IN THE MATTER OF:

CITY OF DETROIT, MICHIGAN	Chapter 9
	Case No. 13-53846
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# ORDER GRANTING LIMITED RELIEF FROM THE AUTOMATIC STAY AND FOR WAIVER OF PROVISIONS OF FED.R.BANKR.P. 4001 (a) (3)

Upon consideration of the parties' Stipulation for an Order Granting Relief From the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3), and the Court being duly advised of the premises;

#### IT IS ORDERED that:

- 1) Relief from that automatic stay applicable under 11 U.S.C. § 922(a) and 11 U.S.C. § 362(a) is GRANTED for the limited purpose of allowing P.P.T.A. Inc., Harold Hoyt, and their clients to take all steps necessary to file property tax appeals against the City of Detroit. However, P.P.T.A. Inc., Harold Hoyt, and their clients shall not take any action to prosecute the appeals or collect any refund of any pre-petition property tax overpayment absent further order of this Court.
- 2) This Court finds that Rule 4001 (a) (3) of the Federal Rules of Bankruptcy Procedure is waived and P.P.T.A. Inc., Harold Hoyt, and their clients may immediately file and commence property tax appeals against the City of Detroit.

#### **EXHIBIT A**