

**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. Thomas J. Tucker

**STIPULATION BY AND BETWEEN THE CITY OF DETROIT,
MICHIGAN AND JEROME COLLINS FOR ADJOURNMENT OF
HEARING ON CITY OF DETROIT’S CORRECTED MOTION FOR THE
ENTRY OF AN ORDER (I) ENFORCING THE PLAN OF ADJUSTMENT
INJUNCTION AND (II) REQUIRING THE DISMISSAL WITH
PREJUDICE OF THE FEDERAL COURT ACTION FILED BY JEROME
COLLINS TO THE EXTENT IT SEEKS RELIEF AGAINST THE CITY OF
DETROIT OR PROPERTY OF THE CITY OF DETROIT**

The City of Detroit, Michigan (“City”) and Jerome Collins (“Collins”) by their undersigned counsel; hereby stipulate and agree as follows:

On August 3, 2016, the Court issued the Notice of Hearing [Doc. No. 11415], scheduling a hearing for August 31, 2016 at 1:30 p.m., on the City’s Corrected Motion for the Entry of an Order (I) Enforcing the Plan of Adjustment Injunction and (I) Requiring the Dismissal With Prejudice of the Federal Court Action Filed by Jerome Collins to the Extent It Seeks Relief Against the City of Detroit or Property of the City of Detroit [Doc. No. 10182] (“Motion”).

1. Counsel for the City recently learned that he has a conflict on August 31 because he likely will need to attend a bankruptcy auction sale in Boston, Massachusetts on August 31 at 10:00 a.m.

2. Counsel for the City and Collins have conferred and agreed that the hearing on the Motion should be adjourned to September 28 at 1:30 p.m.

WHEREFORE, the City and Collins respectfully request that the Court enter an order in substantially the same form as the one attached as Exhibit A.

STIPULATED AND AGREED:

ATTORNEYS FOR THE CITY	ATTORNEYS FOR JEROME COLLINS
By: <u>/s/ Marc N. Swanson</u> Jonathan S. Green (P33140) Marc N. Swanson (P71149) MILLER, CANFIELD, PADDOCK AND STONE, P.L.C. 150 West Jefferson, Suite 2500 Detroit, Michigan 48226 Telephone: (313) 963-6420 Facsimile: (313) 496-7500 swansonm@millercanfield.com spinner@millercanfield.com	By: <u>/s/ Benjamin Whitfield, Jr.</u> Benjamin Whitfield, Jr., Esq. (P23562) Cynthia J. Gaither, Esq. (P40755) BENJAMIN WHITFIELD, JR. & ASSOCIATES, P.C. 547 East Jefferson Ave Detroit, Michigan 48226 Telephone: (313) 961-1000 Facsimile: (313) 961-3110 benwlaw123@aol.com benwlaw4822@aol.com

DATED: August 29, 2016

EXHIBIT A

**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. Thomas J. Tucker
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**ORDER GRANTING STIPULATION BY AND BETWEEN THE CITY OF
DETROIT, MICHIGAN AND JEROME COLLINS FOR ADJOURNMENT
OF HEARING ON CITY OF DETROIT’S CORRECTED MOTION FOR
THE ENTRY OF AN ORDER (I) ENFORCING THE PLAN OF
ADJUSTMENT INJUNCTION AND (II) REQUIRING THE DISMISSAL
WITH PREJUDICE OF THE FEDERAL COURT ACTION FILED BY
JEROME COLLINS TO THE EXTENT IT SEEKS RELIEF AGAINST THE
CITY OF DETROIT OR PROPERTY OF THE CITY OF DETROIT**

Upon the Stipulation by and Between the City of Detroit, Michigan and
Jerome Collins for the Entry of an Order Adjournment of Hearing on the City of
Detroit’s Corrected Motion for the Entry of an Order (I) Enforcing the Plan of
Adjustment Injunction and (I) Requiring the Dismissal With Prejudice of the
Federal Court Action Filed by Jerome Collins to the Extent It Seeks Relief Against
the City of Detroit or Property of the City of Detroit;¹ and the Court being
otherwise advised in the premises;

¹ Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Stipulation

IT IS ORDERED THAT the hearing on the Motion is hereby adjourned to
September 28, 2016, at 1:30 p.m.