

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

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In re : Chapter 9
: :
CITY OF DETROIT, MICHIGAN, : Case No. 13-53846
: :
Debtor : Hon. Thomas J. Tucker
: :
----- X

**STIPULATION WITHDRAWING DEBTOR’S OBJECTION
TO CLAIM NOS. 474 AND 1097 FILED BY RICHARD HALL**

Richard Hall, Claimant, and the City of Detroit, Michigan (the “City”), by and through the undersigned, stipulate as follows in support of the entry of the Order Withdrawing Debtor’s Objection to Claim Nos. 474 and 1097 Filed by Richard Hall, attached hereto as Exhibit 1.

1. Mr. Hall is the holder of Claim Numbers 474 and 1097 (the “Claims”). The Claims are for alleged personal injury due to a highway defect and a Section 1983 claim, respectively (the “Underlying Claims”).

2. On March 30 2015, the City objected to the Claims on the Thirteenth Omnibus Objection to Certain No-Basis Claims (Dkt. No. 9568). The City objected on the basis of the expiration of the statutes of limitation on the Underlying Claims, among other things.

3. The parties have agreed that: (1) the City will withdraw its objection to the Claims, without prejudice; (2) Mr. Hall will have an extension of his applicable statutes of limitations in which to file suit against the City on the Underlying Claims in a non-bankruptcy court of appropriate jurisdiction only until forty-five (45) days after entry of the Order attached as Exhibit 1; and (3) if Mr. Hall does not so file complaint(s) on the Underlying Claims within such forty-five day period, then his Claims will be forever barred and expunged from the claims register.

4833-6484-3558.2

4. Nothing in this stipulation will be construed as an admission by the City that it has any liability to Mr. Hall on account of the Underlying Claims or a waiver of any arguments the City may have. The City reserves all its rights in this matter.

Respectfully submitted by:

<p>By: <u>/s/ Richard Hall (w/consent)</u> PO Box 32511 Detroit, MI 48232 (330) 831-3346</p> <p><i>Holder of Claim Numbers 474 and 1097</i></p>	<p>FOLEY & LARDNER, LLP</p> <p>By: <u>/s/ John A. Simon</u> John A. Simon (P61866) Tamar N. Dolcourt (P73425) Leah R. Imbrogno (P79384) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jsimon@foley.com tdolcourt@foley.com limbrogno@foley.com</p> <p><i>Counsel to the City of Detroit, Michigan</i></p>
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Dated: July 29, 2015

EXHIBIT 1: PROPOSED ORDER

4833-6484-3558.2

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CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Thomas J. Tucker
Debtor	:	
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**ORDER WITHDRAWING DEBTOR’S OBJECTION TO CLAIM
NOS. 474 AND 1097 FILED BY RICHARD HALL**

Upon the stipulation (the “Stipulation”) of the City of Detroit (the “City”), and Richard Hall, the holder of Claim Numbers 474 and 1097, for entry of an order withdrawing the Debtor’s objection as to Claim Numbers 474 and 1097; and the Court being fully advised in the premises; THE COURT HEREBY ORDERS that:

1. The objection to Claim Nos. 474 and 1097 is hereby withdrawn, without prejudice.
2. Mr. Hall will have an extension of his applicable statutes of limitations in which to file suit against the City on the Underlying Claims (as defined in the Stipulation) in a non-bankruptcy court of appropriate jurisdiction until forty-five (45) days after entry of this Order.
3. If Mr. Hall does not so file complaint(s) on the Underlying Claims within such forty-five day period, his Claims against the City will be forever barred and expunged from the claims register.