

**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
	:	
-----	:	
	x	

**STIPULATION FOR WITHDRAWAL OF PROOF OF CLAIM NO. 1806**

Debtor, the City of Detroit, and Claimant, Systematic Recycling, by their respective attorneys, hereby stipulate and agree to the withdrawal of Proof of Claim No. 1806, filed on February 20, 2014, in its entirety and with prejudice (proposed Order attached as Exhibit 1).

Respectfully submitted,

/s/Cindy Rhodes Victor  
**CINDY RHODES VICTOR (P-33613)**  
Attorney for Claimant  
2851 High Meadow Cir., Ste. 120  
Auburn Hills, MI 48326-2790  
(248) 364-3090  
cvictor@victorfirm.com

/s/Eric B. Gaabo  
**ERIC B. GAABO (P-39213)**  
**SHERI L. WHYTE (P-41858)**  
Attorneys for Debtor City of Detroit  
2 Woodward Ave., Ste. 500  
Detroit, MI 48226  
(313) 237-3052  
gaabe@detroitmi.gov  
whyts@detroitmi.gov

Dated: September 17, 2015

EXHIBIT 1: PROPOSED ORDER

**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
	:	
	:	
	x	

**ORDER WITHDRAWING PROOF OF CLAIM NO. 1806**

At a session of said Court held in the City of Detroit, Michigan, on -----

PRESENT: Hon. \_\_\_\_\_

Pursuant to the Stipulation filed by Debtor, the City of Detroit, and Claimant, Systematic Recycling, on September 17, 2015, and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. Proof of Claim No. 1806, filed on February 20, 2014, is withdrawn, in its entirety and with prejudice.
2. The City's claims agent is hereby authorized to update the claims register to reflect the relief granted in this Order.
3. The City is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

**CERTIFICATE OF SERVICE**

I certify that on September 17, 2015, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing and a copy of the pleading to all counsel of record through email correspondence, and further sent the document to Claimant's counsel, Ms. Victor, via email and U.S. Mail at the addresses noted above.

/s/Eric B. Gaabo

Eric B. Gaabo P39213  
Senior Assistant Corporation Counsel  
2 Woodward Avenue, Suite 500  
Detroit, MI 48226  
(313) 237-3052  
[gaabe@detroitmi.gov](mailto:gaabe@detroitmi.gov)

Dated: September 17, 2015