

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

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

**STIPULATION FOR ENTRY OF ORDER ALLOWING CLAIM NO. 3676 OF AIRGAS
USA LLC IN A REDUCED AMOUNT**

Airgas USA LLC (“Airgas”) and the City of Detroit, Michigan (the “City”), by and through the undersigned, stipulate as follows in support of the entry of the *Order Allowing Claim No. 3676 of Airgas USA LLC in a Reduced Amount* attached hereto as **Exhibit 1**.

1. On April 14, 2014, Airgas filed its proof of claim [Claim No. 3676] (the “Claim”) in the amount of \$55,793.34.
2. The parties have determined that the Claim should be reduced to \$41,979.02, none of which is entitled to administrative priority.
3. Therefore, the parties have agreed to allow Claim No. 3676 as a general unsecured claim in the amount of \$41,979.02, which constitutes Airgas’s only pre-petition claim.
4. Nothing in this stipulation is to be construed as a waiver of any of the City’s rights to assert and pursue any claims against Airgas, including, without limitation, claims under chapter 5 of the Bankruptcy Code.

WHEREFORE the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** approving the parties’ stipulation.

Respectfully submitted by:

<p>AIRGAS USA LLC</p> <p>By: <u>/s/ Nancy Reiman (w/ consent)</u> Nancy Reiman Bankruptcy Administrator PO Box 802576 Chicago, IL 60680</p> <p><i>Representative for Airgas USA LLC</i></p>	<p>FOLEY & LARDNER, LLP</p> <p>By: <u>/s/ Tamar N. Dolcourt</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: November 12, 2015

EXHIBIT 1: PROPOSED ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
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In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Thomas J. Tucker
Debtor	:	
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**ORDER ALLOWING CLAIM NO. 3676 OF AIRGAS USA LLC
IN A REDUCED AMOUNT**

This matter having come before the Court on the *Stipulation For Entry of Order Allowing Claim No. 3676 Of Airgas USA LLC in a Reduce Amount* (the “Stipulation”); Airgas¹ having filed Claim No. 3676 (the “Claim”) in the above-captioned bankruptcy case; the parties having agreed that Claim No. 3676 should be allowed as a general unsecured claim in a reduced amount; and the Court being otherwise fully informed:

IT IS HEREBY ORDERED THAT:

1. The Stipulation is approved as provided herein.
2. Claim No. 3676 of Airgas shall be allowed as a general unsecured claim in the amount of \$41,979.02, which constitutes Airgas’s only pre-petition claim.
3. Nothing in this Order is to be construed as a waiver of any of the City’s rights to assert and pursue any claims against Airgas, including, without limitation, claims under chapter 5 of the Bankruptcy Code.
4. The City’s claims agent is authorized to update the claims register accordingly.

¹ Capitalized terms not otherwise defined herein shall have the meaning given to them in the Stipulation.