

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

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**STIPULATION TO EXTEND DEADLINE TO RESPOND TO
SUBPOENAS ISSUED TO THE DETROIT INSTITUTE OF ARTS**

The Detroit Institute of Arts, a Michigan non-profit corporation, f/k/a, among other things, the Detroit Museum of Arts, Detroit Museum of Arts Founders' Society, and Founders Society Detroit Museum of Art (“**DIA Corp.**”), and the Issuing Parties¹ **STIPULATE** and **AGREE** as follows:

1. The Issuing Parties served subpoenas on the DIA Corp. on or about March 31, 2014 and April 11, 2014, seeking, among other things, documents related to the public art institute that is commonly known as the Detroit Institute of Arts.

2. As a result of several conferences, including conferences on April 14,

¹ The Issuing Parties include Financial Guaranty Insurance Company, Hypothekbank Frankfurt AG, Hypothekbank Frankfurt International S.A., and Erste Europäische Pfandbrief-und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A., FMS Wertmanagement AoR, Dexia Credit Local & Dexia Holdings, Inc., the Official Committee of Retirees, Syncora Guarantee Inc. Syncora Capital Assurance Inc., and other parties on whose behalf counsel for the Issuing Parties may be acting.

2014 and April 21, 2014, the parties reached an agreement to narrow the scope of the documents to be produced subject to certain terms and reservations of rights (“**Agreement**”).

3. The DIA Corp. has taken substantial steps to collect and produce responsive documents consistent with the terms of the Agreement. Given the volume of documents and the difficulty associated with producing such documents, however, the DIA Corp. cannot fully comply with the May 6, 2014 deadline set forth in the Court’s *Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment* [Dkt. No. 4202] (“**Scheduling Order**”).

4. Based on the foregoing, the parties stipulate and agree to extend the deadline for the DIA Corp. to comply with the subpoenas to May 20, 2014. The deadline to object is also extended by agreement of the parties.

5. This stipulation is made in good faith and not for any dilatory purpose, and the parties will not be prejudiced by the granting of this stipulation.

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CERTIFICATE OF SERVICE

I, Scott B. Kitei, hereby certify that the foregoing Stipulation to Extend Deadline to Respond to Subpoenas Issued to the Detroit Institute of Arts was filed and served via the Court's electronic case filing and noticing system on this 6th day of May 2014.

/s/ Scott B. Kitei

**UNITED STATES BANKRUPTCY COURT
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SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**ORDER EXTENDING DEADLINE TO RESPOND TO
SUBPOENAS ISSUED TO THE DETROIT INSTITUTE OF ARTS**

This matter having come before the Court on the Stipulation to Extend Deadline to Respond to Subpoenas Issued to The Detroit Institute of Arts (“**DIA Corp.**”), no further notice or hearing being required, and the Court being fully advised in the premises:

IT IS HEREBY ORDERED that, solely with respect to the DIA Corp., the deadline in the Court’s Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment (“**Scheduling Order**”) to comply with or object to timely written discovery requests shall be extended until May 20, 2014. All other terms and conditions set forth in the Scheduling Order shall continue to govern except as otherwise altered by the Court.