

**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. Steven W. Rhodes  
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**STIPULATION MODIFYING CERTAIN DEADLINES  
ESTABLISHED IN THE FOURTH AMENDED ORDER ESTABLISHING  
PROCEDURES, DEADLINES AND HEARING DATES RELATING  
TO THE DEBTOR'S PLAN OF ADJUSTMENT [Docket No. 4202]**

This Stipulation (this "Stipulation") is made by the (i) City of Detroit and (ii) the Attorney General of the State of Michigan, Bill Schuette (the "Attorney General").<sup>1</sup>

WHEREAS, as of the date of this Stipulation, the City has reached agreements (or agreements in principle) with (i) the Official Committee of Retirees; (ii) the General Retirement System for the City of Detroit; (iii) the Police and Fire Retirement System for the City of Detroit; (iv) the Michigan Council 25 of the American Federation of State, County & Municipal Employees, the AFL-CIO and Sub-Chapter 98, the City of Detroit Retirees (AFSCME); (v) the

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit (Docket No. 4392) (the "Plan").

Retired Detroit Police and Fire Fighters Association; (vi) the Detroit Retired City Employees Association; (vii) the Detroit Police Lieutenants and Sergeants Association; and (viii) the Detroit Police Command Officers Association regarding the treatment of "Pension Claims" (May 5, 2014) (Docket No. 4392) as set forth in the Plan.

WHEREAS, as a consequence of these agreements and in light of the Attorney General's duty to defend and uphold Michigan's constitution, the Attorney General seeks to reserve the right to file his statement regarding the plan in defense of Michigan's Pension Clause, Mich. Const. 1963, art. 9, § 24 and its protection of accrued financial benefits, depending on whether both Classes 10 and 11 vote to accept the Plan and its modification of their pension benefits. By reserving the option to file a statement, the Attorney General seeks to preserve the carefully considered, bargained for settlements between the City and the representative union organizations.

WHEREAS, in light of the foregoing, the City and the Attorney General have agreed to the modification of certain deadlines established by this Court's Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment (Docket No. 4202).

By and through each of their undersigned counsel, the City and the Attorney General have reached agreement regarding, and hereby stipulate to the entry of, the order attached hereto as Exhibit 1.

Dated: May 12, 2014

/s/ Michael R. Bell

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**ORDER APPROVING THE STIPULATION  
MODIFYING CERTAIN DEADLINES ESTABLISHED  
IN THE FOURTH AMENDED ORDER ESTABLISHING  
PROCEDURES, DEADLINES AND HEARING DATES RELATING  
TO THE DEBTOR'S PLAN OF ADJUSTMENT [Docket No. 4202]**

The Stipulation Modifying Certain Deadlines Established in the Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment (the "Stipulation"),<sup>1</sup> having been entered into by (i) the City of Detroit and (ii) the Attorney General of the State of Michigan, Bill Schuette; the Court having reviewed the Stipulation; and the Court being fully advised in the premises;

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Stipulation or in the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit (Docket No. 4392) (the "Plan").

IT IS HEREBY ORDERED THAT:

1. The Plan contemplates certain funding to be provided by the State Contribution Agreement and the DIA Settlement, subject to the fulfillment of the conditions that accompany such funding (the "Funding Commitments"). If the Funding Commitments are not made by June 20, 2014, the Attorney General shall file and serve his statement with respect to Michigan's Pension Clause and the Plan no later than June 22, 2014. If the Funding Commitments are made by June 20, 2014, but if either of Class 10 or Class 11 votes to reject the Plan, or the plan is materially modified to the detriment of holders of claims in class 10 or 11, the Attorney General shall file and serve his statement with respect to Michigan's Pension Clause and the Plan no later than July 17, 2014.

2. Modification of Stipulation. The terms of the Stipulation may be amended, modified or supplemented only as agreed in writing by the City and the Attorney General and by further order of this Court.

3. No Other Modifications. Except as modified by this stipulation and any other stipulations entered into by the City, the provisions of the Fourth Amended Scheduling Order remain in full force and effect.