

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

In re:)	
)	
CITY OF DETROIT, MICHIGAN)	Case No. 13-53846
)	
Debtor)	Chapter 9
)	
)	Hon. Steven W. Rhodes
)	

**STIPULATION EXTENDING TIME FOR MACOMB INTERCEPTOR
DRAIN DRAINAGE DISTRICT TO FILE MOTION UNDER RULE 3018**

This stipulation (this “Stipulation”) is made by (i) the City of Detroit (the “City” or the “Debtor”) and (ii) the Macomb Interceptor Drain Drainage District (the “MIDDD”), a creditor and party in interest in the above-captioned Chapter 9 bankruptcy case.¹

WHEREAS, on May 5, 2014, MIDDD filed its proof of claim [Claim No. 3683] (the “MIDDD Claim”).

WHEREAS, on March 11, 2014, the Court entered the *Order (I) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Adjustment and (II) Approving Notice Procedures Related to Confirmation of the Plan of Adjustment* [Docket No. 2984] (the “Solicitation Procedures Order”). Under the Solicitation Procedures Order:

if the City has filed and served an objection to a claim by May 15, 2014, such claim will be temporarily allowed or disallowed for voting purposes in accordance with the relief sought in the objection. If an objection does not identify the proposed amount of a claim (e.g., if the claim remains subject to estimation or liquidation), then such claim will be temporarily allowed in the amount of \$1.00.

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the *Fourth Amended Plan for the Adjustment of Debts of the City of Detroit* [Docket No. 4392] (the “Plan”).

Solicitation Procedures Order, at Exhibit 1 (the “Tabulation Rules”). In the event the City files an objection to a claim, and if a claimant seeks different treatment of a claim for voting purposes other than in accordance with the Tabulation Rules, the Solicitation Procedures Order allows the claimant to file a motion pursuant to Bankruptcy Rule 3018(a) for an order temporarily allowing such claim in a different amount or classification for purposes of voting to accept or reject the Plan (a “Rule 3018 Motion”) within ten (10) days after the City’s filing of the objection.

Solicitation Procedures Order, at 13.

WHEREAS, on May 15, 2014, the City filed its *Objection of the City of Detroit, Pursuant to Sections 105 and 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1, to Proof of Claim Number 3683 Filed by Macomb Interceptor Drain Drainage District By and Through the Macomb County Public Works Commissioner* [Docket No. 4880] (the “Claim Objection”).²

WHEREAS, the deadline under the Solicitation Procedures Order for MIDDD to file a Rule 3018 Motion is May 27, 2014.

WHEREAS, the City and MIDDD have agreed to extend the deadline for MIDDD to file a Rule 3018 Motion to May 30, 2014.

[Remainder of page intentionally left blank.]

² On May 20, 2014, the City filed a corrected objection [Docket No. 4954].

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

Dated: May 23, 2014

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EXHIBIT 1

Proposed Order

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:)	
)	
CITY OF DETROIT, MICHIGAN)	Case No. 13-53846
)	
Debtor)	Chapter 9
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)	Hon. Steven W. Rhodes

**ORDER APPROVING STIPULATION EXTENDING TIME FOR
MACOMB INTERCEPTOR DRAIN DRAINAGE DISTRICT TO FILE
MOTION UNDER RULE 3018**

This matter comes before the Court on the Stipulation Extending Time for Macomb Interceptor Drain Drainage District to File Motion Under Rule 3018 (the “Stipulation”);¹ and the Court having reviewed and considered the Stipulation; and upon due deliberation and sufficient cause appearing therefore;

IT IS ORDERED, ADJUDGED AND DECREED THAT:

1. The Stipulation is APPROVED.
2. The time for MIDDD to file a Rule 3018 Motion is extended to and including May 30, 2014.
3. Modifications of Stipulation. The terms of the Stipulation may be amended, modified or supplemented only as agreed in writing by the City and MIDD and by further order of this Court.

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Stipulation.

4. No Other Modifications. Except as modified by this Order and any other stipulations entered into by the City, the provisions of the Solicitation Procedures Order remain in full force and effect.

Signed on _____, 2014

Steven Rhodes
United States Bankruptcy Judge