

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

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In re : Chapter 9
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CITY OF DETROIT, MICHIGAN, : Case No. 13- 53846
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Debtor. : Hon. Steven W. Rhodes
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**STIPULATION BETWEEN THE CITY OF DETROIT AND
SYNCORA GUARANTEE INC. REGARDING DOCUMENTS
TO BE PRODUCED BY THE DETROIT POLICE DEPARTMENT**

Syncora Guarantee Inc. and the City stipulate and agree that the City will not be required to perform a full search of all electronically stored information of the Detroit Police Department (“DPD”), but instead will produce the following DPD documents for the period from January 1, 2013 through April 16, 2014:

1. Documentation showing each of the classes of new recruits that started at the Detroit Police Academy
2. Report showing all new hires by the DPD
3. Documents regarding the number of “interest cards” and applications submitted by prospective employees of the DPD, including the number of applicants for each open position
4. Documents regarding the August 2013 job fair held by the DPD, which attracted over 600 applicants
5. Documents relating to college campus visits/recruiting by the DPD
6. Documents relating to the DPD’s student intern program

7. Documents relating to opportunities for promotion within the DPD
8. Report showing all separations (including retirement, voluntary and involuntary separations)
9. Retirement requests by DPD employees
10. Notices of resignations by DPD employees
11. Documents/information gathered or created during exit interviews with separated DPD employees
12. Documents regarding grievances filed by employees
13. Results of the online survey of personnel conducted when Chief Craig arrived at the DPD
14. Documents showing case clearance rates, including changes in those rates
15. Reports/memoranda addressing equipment, fleet, technology and manpower needs
16. Memoranda prepared in conjunction with consultants from Conway MacKenzie
17. The Detroit Police Plan of Action: Strategic Restructuring / Creating Excellence in Policing (the "Plan of Action")
18. Documents relied on in creating the Plan of Action

Respectfully submitted,

Dated: June 10, 2014

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