

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

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

**NOTICE OF PROPOSED ORDER APPROVING STIPULATION
MODIFYING CERTAIN DEADLINES ESTABLISHED IN
THE FIFTH AMENDED ORDER ESTABLISHING PROCEDURES,
DEADLINES, AND HEARING DATES RELATING TO
THE DEBTOR’S PLAN OF ADJUSTMENT [Docket No. 5259]**

PLEASE TAKE NOTICE OF THE FOLLOWING:

The City of Detroit (the “City”) has filed a proposed Order approving the Stipulation Modifying Certain Deadlines Established in the Fifth Amended Order Establishing Procedures, Deadlines, and Hearing Dates Relating to the Debtor’s Plan of Adjustment [Docket No. 5259], by and between (i) the City; (ii) Ambac Assurance Corporation; and (iii) BlackRock Financial Management, Inc., attached hereto as Exhibit 1.

Dated: June 20, 2014

Respectfully Submitted,

David G. Heiman (OH 0038271)
Heather Lennox (OH 0059649)
Thomas A. Wilson (OH 0077047)
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212

Thomas F. Cullen, Jr.
Gregory M. Shumaker
Geoffrey S. Stewart
Geoffrey S. Irwin
JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001.2113
Telephone: (202) 879-3939
Facsimile: (202) 626-1700

/s/ Deborah Kovsky-Apap
Robert S. Hertzberg (P30261)
Deborah Kovsky-Apap (P68258)
PEPPER HAMILTON LLP
4000 Town Center, Suite 1800
Southfield, MI 48075
Telephone: (248) 359-7300
Facsimile: (248) 359-7700
hertzbergr@pepperlaw.com
kovskyd@pepperlaw.com

**ATTORNEYS FOR THE CITY OF
DETROIT**

Exhibit 1
Proposed Order

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

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

**ORDER APPROVING STIPULATION MODIFYING CERTAIN
DEADLINES ESTABLISHED IN THE FIFTH AMENDED ORDER
ESTABLISHING PROCEDURES, DEADLINES, AND
HEARING DATES RELATING TO THE DEBTOR'S
PLAN OF ADJUSTMENT [Docket No. 5259]**

The Stipulation Modifying Certain Deadlines Established in the Fifth Amended Order Establishing Procedures, Deadlines, and Hearing Dates Relating to the Debtor's Plan of Adjustment, attached hereto as Exhibit A, having been entered into by and between (i) the City; (ii) Ambac Assurance Corporation; and (iii) BlackRock Financial Management, Inc.; the Court having reviewed the Stipulation; and the Court being full advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED.

Exhibit A
Stipulation

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

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

**STIPULATION MODIFYING CERTAIN DEADLINES
ESTABLISHED IN THE FIFTH AMENDED ORDER ESTABLISHING
PROCEDURES, DEADLINES, AND HEARING DATES RELATING TO
THE DEBTOR’S PLAN OF ADJUSTMENT [Docket No. 5259]**

This Stipulation (the “Stipulation”) is made by and among the (i) City of Detroit (the “City”); (ii) Ambac Assurance Corporation (“Ambac”), and (iii) Blackrock Financial Management, Inc. (“Blackrock,” and collectively with the City and Ambac, the “Parties”). By and through each of their undersigned counsel, the Parties have reached an agreement with respect to, and request the entry of an order approving, the following:

RECITALS

A. As of the date of this Stipulation, the City has reached an agreement in principle with Ambac and Blackrock regarding the treatment of “LTGO Claims” (as such term is defined in the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit, ECF No. 4392 (the “Plan”). Nothing herein is intended to alter, amend, or expand this agreement in principle.

B. In light of this agreement in principle, the Parties have further agreed to the modification of certain deadlines established by this Court's Fifth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment, ECF No. 5235 (the "Fifth Amended Scheduling Order") as set forth herein.

STIPULATION

NOW, THEREFORE, it is hereby stipulated and agreed by and among the Parties, through their undersigned counsel:

1. All litigation deadlines established in the Fifth Amended Order, beginning with the June 20, 2014 deadline to file amended witness lists in paragraph 1(a), and all subsequent deadlines contained in the Fifth Amended Scheduling Order, will be held in abeyance for Ambac and Blackrock pending the execution of a final agreement among the Parties and the City's filing of an Amended Plan of Adjustment reflecting and incorporating the Parties' agreement.

2. Excepted from this Stipulation are the deadlines with respect to Ambac's voting rights, namely, the deadline for Ambac to file a reply brief, if necessary, in support of its right to vote (July 2, 2014), and the hearing on Ambac's Notice of Asserted Right to Vote a Claim (July 14, 2014).

3. Upon the filing of a notice from any of the Parties indicating that a final agreement among the Parties could not be reached, the Court will reset all

litigation deadlines in the Fifth Amended Scheduling Order for Ambac and Blackrock.

4. The Parties further stipulate that issue number 9 on the Order Identifying Legal Issues Establishing Supplemental Briefing and Setting Hearing Deadlines, ECF No. 5235 (the “Order Identifying Legal Issues”), regarding the status of LTGO Claims, should not be heard at the hearing on the legal issues scheduled for July 17, 2014.

5. The terms of this Stipulation may be amended, modified, or supplemented only as agreed in writing by the Parties and by further order of this Court.

6. Except as modified herein with respect to the Parties, the provisions of the Fifth Amended Scheduling Order remain in full force and effect; provided, however, that any other concerns or objections that any Party has or may have regarding the Fifth Amended Scheduling Order are preserved and not waived and may be brought before the Court separately from this Stipulation.

Dated: June 20, 2014

Respectfully Submitted,

David G. Heiman (OH 0038271)
Heather Lennox (OH 0059649)
Thomas A. Wilson (OH 0077047)
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212

Thomas F. Cullen, Jr.
Gregory M. Shumaker
Geoffrey S. Stewart
Geoffrey S. Irwin
JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001.2113
Telephone: (202) 879-3939
Facsimile: (202) 626-1700

/s/ Deborah Kovsky-Apap
Robert S. Hertzberg (P30261)
Deborah Kovsky-Apap (P68258)
PEPPER HAMILTON LLP
4000 Town Center, Suite 1800
Southfield, MI 48075
Telephone: (248) 359-7300
Facsimile: (248) 359-7700
hertzbergr@pepperlaw.com
kovskyd@pepperlaw.com

*Attorneys for the City Of
Detroit*

ARENT FOX LLP

By: /s/ Carol Connor Cohen

Carol Connor Cohen

Caroline Turner English

Randall Brater

1717 K Street, NW

Washington, DC 20036-5342

(202) 857-6054

Email: Carol.Cohen@arentfox.com

David L. Dubrow

Mark A. Angelov

1675 Broadway

New York, NY 10019

(212) 484-3900

– and –

SCHAFFER AND WEINER, PLLC

Daniel J. Weiner (P32010)

Brendan G. Best (P66370)

40950 Woodward Ave., Ste. 100

Bloomfield Hills, MI 48304

(248) 540-3340

Email: bbest@schaferandweiner.com

Attorneys for Ambac Assurance Corporation

**KRAMER LEVIN NAFTALIS &
FRANKEL LLP**

By: /s/ Amy Caton

Amy Caton

1177 Avenue of the Americas

New York, New York 10036

(212) 715-7772

Email: acaton@kramerlevin.com

– and –

STEINBERG SHAPIRO & CLARK

Geoffrey T. Pavlic, Esq.
25925 Telegraph Road, Suite 203
Southfield, MI 48033
(248) 352-4700
pavlc@steinbergshapiro.com

*Attorneys for BlackRock Financial
Management, Inc.*