

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

In re:

City of Detroit, Michigan

Debtor

Case No. 13-53846
Chapter 9
Hon. Steven W. Rhodes

**STIPULATION AND CONSENT FOR ENTRY OF ORDER MODIFYING
AUTOMATIC STAY AS TO STROH PROPERTIES, INC.**

The City of Detroit and Stroh Properties, Inc. stipulate and agree to the entry of the order attached as Exhibit A (the "Order").

Dated: June 24, 2014

Agreed to:

ATTORNEYS FOR STROH PROPERTIES, INC.

By: /s/ Thomas B. Radom
Thomas B. Radom (P24631)
Roxana Gale Zaha (P73060)
BUTZEL LONG, P.C.
Stoneridge West Bldg.
41000 Woodward Avenue
Bloomfield Hills, MI 48304
Telephone: 248-258-1616
Facsimile: 248-258-1439
radom@butzel.com
zaha@butzel.com

ATTORNEYS FOR CITY OF DETROIT

By: /s/ Stephen S. LaPlante
Jonathan S. Green (MI P33140)
Stephen S. LaPlante (MI P48063)
Timothy A. Fusco (MI P13768)
MILLER, CANFIELD, PADDOCK & STONE, P.L.C.
150 West Jefferson, Suite 2500
Detroit, MI 48226
Telephone: 313-963-6420
Facsimile: 313-496-7500
green@millercanfield.com
laplante@millercanfield.com

David G. Heiman (OH 0038271)
Heather Lennox (OH 0059649)
JONES DAY
North Point
910 Lakeside Avenue
Cleveland, OH 44114
Telephone: 216-586-3939
Facsimile: 216-579-0212
dgheiman@jonesday.com
hlennox@jonesday.com

Bruce Bennett (CA 105430)
JONES DAY
555 South Flower Street, 50th Floor
Los Angeles, CA 90071
Telephone: 213-243-2382
Facsimile: 213-243-2539
bbennett@jonesday.com

Eric B. Gaabo (P39213)
CITY OF DETROIT LAW DEPARTMENT
Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 500
Detroit, MI 48226
Telephone: 313-237-3052
Facsimile: 313-224-5505
gaabe@detroitmi.gov

EXHIBIT A

EXHIBIT A

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

In re:

City of Detroit, Michigan

Debtor.

Case No. 13-53846

Chapter 9

Hon. Steven W. Rhodes

ORDER MODIFYING AUTOMATIC STAY AS TO STROH PROPERTIES, INC.

Upon the Stipulation and Consent For Entry of Order Modifying Automatic Stay as to Stroh Properties, Inc.; the Court having reviewed the Stipulation and Consent and determining that good and sufficient cause has been shown;

IT IS HEREBY ORDERED that the Automatic Stay under 11 U.S.C. § 362 is modified such that the parties may proceed in STROH PROPERTIES, INC. v. THE CITY OF DETROIT, EGRO-STROH PROPERTIES LLC, and KAP'S WHOLESALE FOOD SERVICE, INC., U.S. District Court, Eastern District, Case No. 12-13219 (Hon. Lawrence P. Zatkoff) (the "Lawsuit"), to final judgment and any appeals or related proceedings with respect to the Lawsuit; all of which shall be binding on, and fully enforceable against, the City of Detroit, provided, however, Stroh Properties, Inc. will not pursue and remains stayed from pursuing any claim in the Lawsuit or under claimant's filed proof of claim against the City of Detroit for money damages, including without limitation, costs or attorneys' fees.

IT IS FURTHER ORDERED that this Order is effective immediately.