

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

	X	
	:	CHAPTER 9
IN RE	:	
	:	CASE NO. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	HON. STEVEN W. RHODES
DEBTOR	:	
	:	
	X	

**STIPULATION TO ENTRY OF ORDER RESOLVING OMNIBUS CLAIMS  
OBJECTION WITH RESPECT TO CLAIMS FILED BY BEATRICE MCQUEEN**

Beatrice McQueen and the City of Detroit, Michigan (the “City”), by and through its undersigned counsel, state as follows in support of the entry of the *Order Resolving Omnibus Claims Objection with Respect to Claims Filed by Beatrice McQueen* attached hereto as **Exhibit 1**.

1. On December 6, 2013, Ms. McQueen filed a proof of claim related to vacation pay she claims is due to her from the City in the amount of \$3,968.00 [Claim No. 159].

2. On February 5, 2014, Ms. McQueen filed a second proof of claim related to vacation pay she claims is due to her from the City in the amount of \$3,968.00 [Claim No. 785].

3. On May 14, 2014, the City filed its *First Omnibus Objection to Certain Claims* [Doc. No. 4792] (the “Claims Objection”) wherein it objected to Claim No. 159 on the basis that it was duplicative of Claim No. 785.

4. Upon discussion by the Parties, Ms. McQueen agreed that Claim No. 159 is duplicative of Claim No. 785 and agreed to withdraw it.

5. The City reserves all of its rights to object to Claim No. 785 on any grounds and Ms. McQueen reserves all of her rights to respond to any such objections.

4814-1447-7083.1

**WHEREFORE** the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** resolving the Claim Objection with respect to Ms. McQueen's claims.

Respectfully submitted by:

<p><b>FOLEY &amp; LARDNER, LLP</b></p> <p>By: <u>/s/ Tamar N. Dolcourt</u> John A. Simon (P61866) Tamar N. Dolcourt (P 73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 <a href="mailto:jsimon@foley.com">jsimon@foley.com</a> <a href="mailto:tdolcourt@foley.com">tdolcourt@foley.com</a> <i>Counsel to the Debtor, City of Detroit Michigan</i></p> <p>Dated: June 24, 2014</p>	<p>By: <u>/s/ Beatrice McQueen (w/consent)</u> Beatrice McQueen 26533 Blumfield Roseville, MI 48066 Phone: (586) 439-8564 mcqueenbea@yahoo.com</p>
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# **EXHIBIT 1**

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CITY OF DETROIT, MICHIGAN,	:	
	:	HON. STEVEN W. RHODES
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-----X	:	

**ORDER RESOLVING OMNIBUS CLAIMS OBJECTION  
WITH RESPECT TO CLAIMS FILED BY BEATRICE MCQUEEN**

This matter having come before the Court on the *Stipulation to Entry of Order Resolving Omnibus Claims Objection With Respect to Claims Filed by Beatrice McQueen* (the “Stipulation”); Ms. McQueen having filed Claim Nos. 159 and 785 in the above-captioned bankruptcy case; the City having filed the Claim Objection asserting that the claims filed by Ms. McQueen were duplicative of each other; and the Court being otherwise fully informed:

**IT IS HEREBY ORDERED THAT:**

1. Ms. McQueen withdraws Claim No. 159 because it is duplicative of Claim No. 785.
2. Claim No. 785, in the amount of \$3,968.00, will remain on the Claims Register.
3. Notwithstanding any provision of this Order, the City reserves any and all rights to object to Claim No. 785 based on any grounds, and Ms. McQueen reserves her rights to assert any and all defenses to any such objection.
4. Nothing in the Stipulation or this Order affects the rights of the City with respect to Ms. McQueen or Ms. McQueen with respect to the City in any other circumstances, and the parties reserve all such rights.

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