

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

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	x	
In re:	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846 (SWR)
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
	:	
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**STIPULATION FOR ENTRY OF AN ORDER
CONCERNING THE DEADLINE FOR OBJECTING CREDITORS TO SERVE COPIES
OF CERTAIN REBUTTAL EXPERT REPORTS**

NOW COMES the City of Detroit, Michigan; Syncora Capital Assurance Inc. and Syncora Guarantee Inc. (“Syncora”); Financial Guaranty Insurance Company (“FGIC”); and the Ad Hoc COPs-Holders (collectively, “Objecting Creditors”), by and through the undersigned counsel, and hereby stipulate to entry of an Order Concerning the Deadline for Objecting Creditors to Serve Copies of Certain Rebuttal Expert Reports in the form of Exhibit A hereto.

Whereas, the Court entered the Fifth Amended Order Establishing the Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment (Docket No. 5259) (the “Fifth Amended Scheduling Order”) on June 9, 2014. The Fifth Amended Scheduling Order establishes certain dates for objecting creditors to file a list of expert witnesses and serve copies of rebuttal expert reports.

Whereas, the Objecting Creditors contacted the City on or about July 14, 2014, to discuss the availability of Alan Perry, the City’s pension expert, to be deposed. The Objectors suggested July 21, 2014. The City responded that Mr. Perry was unavailable on July 21, but was available on July 24 and July 25, 2014.

Whereas, the parties worked cooperatively to reach a resolution that both accommodated Mr. Perry's schedule while at the same time preserving the opportunity for Objecting Creditors' pension experts to consider Mr. Perry's testimony before finalizing their reports, the parties agreed as follows:

1. The deposition of Mr. Perry will take place on July 25, 2014.
2. The deadline for reports from the Objecting Creditors' experts that address pensions shall be extended to **July 29, 2014**. This extension pertains to one expert for Syncora and one expert for the Ad-Hoc COPs-Holders. FGIC will file an expert report that addresses pensions on **July 25, 2014** but may supplement that report by **July 29, 2014**.
3. The deadline for all other rebuttal expert reports and disclosure of expert witnesses remains July 25, 2014, in accordance with the Fifth Amended Scheduling Order.

Dated: July 24, 2014

Respectfully submitted,

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Exhibit A

**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 (SWR)
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Debtor.	:	Hon. Steven W. Rhodes
	:	
	:	
	X	

**ORDER CONCERNING THE DEADLINE FOR OBJECTING CREDITORS TO SERVE
COPIES OF CERTAIN REBUTTAL EXPERT REPORTS**

This matter having come to the Court upon the stipulation of the City of Detroit, Michigan; Syncora Capital Assurance Inc. and Syncora Guarantee Inc. (“Syncora”); Financial Guaranty Insurance Company; and the Ad Hoc COPs-Holders (collectively, “Objecting Creditors”); and the Court being otherwise duly advised in the premises;

NOW, THEREFORE, IT IS ORDERED that the deadline for Objecting Creditors to serve copies of rebuttal expert reports regarding pensions shall be extended to **July 29, 2014**. This Order pertains to one expert from Syncora and one expert from the Ad-Hoc COPs-Holders. FGIC will file an expert report that addresses pensions on **July 25, 2014** but may supplement that report by **July 29, 2014**. All other deadlines in the Fifth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment (Docket No. 5259) shall remain the same.