

**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 FOR WITHDRAWAL OF SATISFIED CLAIM OF ENFORCEMENT
TECHNOLOGY, INC.**

Enforcement Technology, Inc. (“Enforcement Technology”) and the City of Detroit, Michigan (the “City”), by and through their undersigned counsel, stipulate as follows in support of the entry of the *Order Withdrawing Satisfied Claim of Enforcement Technology, Inc.* attached hereto as **Exhibit 1**.

1. On February 13, 2014, Enforcement Technology filed its proof of claim [Claim No. 1013] (the “Claim”) in the amount of \$75,315.23.

2. The Claim sought \$15,295.00 as a claim under Section 503(b)(9) of the Bankruptcy Code and the remainder, \$60,020.23, as a general unsecured claim.

3. In the ordinary course of its business, the City has paid Enforcement Technologies all of the amounts sought in the Claim.

4. Enforcement Technology hereby withdraws the Claim in its entirety because the Claim has been fully satisfied.

4. Nothing in this Stipulation or the proposed order attached hereto as Exhibit 1 addresses any post-petition claims which have arisen or may arise between the City and

Enforcement Technology. Both parties fully reserve all of their respective rights with respect to any post-petition claims.

WHEREFORE the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** withdrawing the Claim.

Respectfully submitted by:

<p>REINHART BOERNER VAN DEUREN, s.c.</p> <p>By: <u>/s/ L. Katie Mason (w/consent)</u> L. Katie Mason 1000 North Water Street, Ste. 1700 Milwaukee, WI 53202 Phone: (414) 298-1000 kmason@reinhardt.com</p> <p><i>Counsel to Enforcement Technology, Inc.</i></p>	<p>FOLEY & LARDNER, LLP</p> <p>By: <u>/s/ Tamar N. Dolcourt</u> John A. Simon (P61866) Tamar N. Dolcourt (P73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jsimon@foley.com tdolcourt@foley.com</p> <p><i>Counsel to the City of Detroit, Michigan</i></p>
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Dated: September 15, 2014

EXHIBIT 1: PROPOSED ORDER

4822-8571-8046.2

**IN THE UNITED STATES BANKRUPTCY COURT
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SOUTHERN DIVISION**

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

**ORDER APPROVING STIPULATION FOR WITHDRAWAL OF SATISFIED CLAIM
OF ENFORCEMENT TECHNOLOGY, INC.**

This matter having come before the Court on the *Stipulation For Withdrawal Of Satisfied Claim Of Enforcement Technology, Inc.* (the “Stipulation”); Enforcement Technology¹ having filed Claim No. 1013 (the “Claim”) in the above-captioned bankruptcy case; the City having paid all amounts sought in the Claim in the ordinary course of its business; Enforcement Technology having agreed that the Claim has been fully satisfied; and the Court being otherwise fully informed:

IT IS HEREBY ORDERED THAT:

1. Claim No. 1013 filed by Enforcement Technology is withdrawn in its entirety.
2. The City’s claims agent is hereby authorized to update the claims register to reflect the relief granted in this Order.
3. The City is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

¹ Capitalized terms not otherwise defined herein shall have the meaning given to them in the Stipulation.

4. Nothing in the Stipulation or this Order affects the rights of the City or Enforcement Technology with respect to any post-petition claims which have arisen or may arise between the parties. Both parties fully reserve all of their respective rights with respect to any post-petition claims.