

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

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

**STIPULATION FOR AN ORDER (I) REFERRING  
TO FACILITATIVE MEDIATION OBJECTIONS TO  
CERTAIN CLAIMS FILED BY MICHIGAN AFSCME COUNCIL 25  
AND ITS AFFILIATED DETROIT LOCALS AND THE COALITION  
OF DETROIT UNIONS, (II) CONTINUING HEARING ON RELATED  
CLAIM OBJECTIONS AND (III) MODIFYING BRIEFING SCHEDULE**

The City of Detroit (the "City") and Michigan AFSCME Council 25 and its affiliated Detroit Locals ("AFSCME") and the Coalition of Detroit Unions (the "Coalition" and, collectively with the City and AFSCME, the "Parties"), by and through each of their undersigned counsel, stipulate as follows:

1. On February 21, 2014, AFSCME filed proof of claim number 2958 asserting liabilities against the City in the aggregate amount of not less than \$8,718,697,854.82 (the "AFSCME Claim").
2. Also on February 21, 2014, the Coalition, of which AFSCME is a member, filed proof of claim number 2851 asserting liabilities against the City in

the aggregate amount of \$242,586,116.50 (the "Coalition Claim" and, together with the AFSCME Claim, the "Claims").

3. On May 15, 2014, the City filed and served objections (together, the "Objections") to (a) the Coalition Claim (Docket No. 4874) and (b) the AFSCME Claim (Docket No. 4876).

4. On June 18, 2014, the Court entered an agreed order (Docket No. 5454) (the "Prior Order") continuing the hearing on the Objections (the "Hearing") to the hearing scheduled for October 1, 2014, at 10:00 a.m., Eastern Time. By the Prior Order, the Court also extended the deadline for: (a) AFSCME and the Coalition to file responses to the Objections (together, the "Responses") to September 1, 2014; and (b) the City to file any replies to the Responses to September 24, 2014 (the "Reply Deadline").

5. Since the entry of the Prior Order, AFSCME and the Coalition filed Responses to the Objections (Docket Nos. 7235 and 7240, respectively), and the Parties have continued to negotiate regarding the most efficient method of resolving or liquidating the Claims.

6. The Parties have agreed that the Claims should be referred to facilitative mediation before the Honorable Judge Victoria Roberts (the "Mediation"). To this end, the Parties have agreed to the following schedule and procedures, subject to approval of the Court:

- (a) The Parties shall exchange mediation briefs by September 29, 2014;
- (b) All information requests and responses among the Parties in connection with the Mediation shall be presented in the first instance to Judge Roberts for a determination as to their reasonableness;
- (c) The Reply Deadline shall be extended to October 17, 2014;
- (d) The Parties shall make reasonable efforts to mediate the Claims in good faith; and
- (e) The Hearing shall be continued to the hearing reserved for claims objections scheduled for November 5, 2014 at 10:00 a.m., Eastern Time, and the Hearing shall proceed at that time as a non-evidentiary status conference for the purpose of advising the Court on progress in the Mediation.

7. The Parties request that the Court enter the proposed Order attached hereto as Exhibit 1 approving this Stipulation.

Dated: September 24, 2014

/s/ Richard G. Mack

Richard G. Mack, Jr., Esq.  
MILLER COHEN PLC  
600 West Lafayette Boulevard  
4th Floor  
Detroit, MI 48226-3191  
Telephone: (313) 566-4787  
Facsimile: (313) 964-4490  
richardmack@millercohen.com

ATTORNEYS FOR AFSCME  
AND THE COALITION

/s/ Heather Lennox

David G. Heiman (OH 0038271)  
Heather Lennox (OH 0059649)  
JONES DAY  
North Point  
901 Lakeside Avenue  
Cleveland, Ohio 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  
Fiftieth Floor  
Los Angeles, California 90071  
Telephone: (213) 243-2382  
Facsimile: (213) 243-2539  
bbennett@jonesday.com

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

ATTORNEYS FOR THE CITY

**EXHIBIT 1**

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

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

**ORDER (I) REFERRING TO FACILITATIVE  
MEDIATION OBJECTIONS TO CERTAIN CLAIMS  
FILED BY MICHIGAN AFSCME COUNCIL 25 AND ITS  
AFFILIATED DETROIT LOCALS AND THE COALITION OF  
DETROIT UNIONS, (II) CONTINUING HEARING ON RELATED  
CLAIM OBJECTIONS AND (III) MODIFYING BRIEFING SCHEDULE**

This matter came before the Court on the Stipulation for an Order (I) Referring to Facilitative Mediation Objections to Certain Claims Filed by Michigan AFSCME Council 25 and Its Affiliated Detroit Locals and the Coalition of Detroit Unions, (II) Continuing Hearing on Related Claim Objections and (III) Modifying Briefing Schedule (the "Stipulation"),<sup>1</sup> filed by the City of Detroit (the "City"), Michigan AFSCME Council 25 and Its Affiliated Detroit Locals ("AFSCME") and the Coalition of Detroit Unions (the "Coalition" and, collectively

---

<sup>1</sup> Capitalized terms not defined herein have the meanings given to them in the Stipulation.

with the City and AFSCME, the "Parties"); the Court having reviewed the Stipulation; the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED.
2. The Claims are referred to facilitative mediation before the Honorable Judge Victoria Roberts (the "Mediation").
3. The Parties shall exchange mediation briefs with respect to the Mediation by September 29, 2014.
4. All information requests and responses among the Parties in connection with the Mediation shall be presented in the first instance to Judge Roberts for a determination as to their reasonableness.
5. The Reply Deadline shall be extended to October 17, 2014.
6. The Parties shall make reasonable efforts to mediate the Claims in good faith.

7. The Hearing on the Objections shall be continued to the hearing reserved for claims objections scheduled for November 5, 2014 at 10:00 a.m., Eastern Time. The Hearing shall proceed at that time as a non-evidentiary status conference for the purpose of advising the Court on progress in the Mediation.



**CERTIFICATE OF SERVICE**

I, Heather Lennox, hereby certify that the foregoing Stipulation for an Order (I) Referring to Facilitative Mediation Objections to Certain Claims Filed by Michigan AFSCME Council 25 and Its Affiliated Detroit Locals and the Coalition of Detroit Unions, (II) Continuing Hearing on Related Claim Objections and (III) Modifying Briefing Schedule was filed and served via the Court's electronic case filing and noticing system on this 24th day of September, 2014.

/s/ Heather Lennox \_\_\_\_\_