

**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,	:	
	:	
DEBTOR	:	Hon. Steven W. Rhodes
	X	

**STIPULATION TO WITHDRAW DUPLICATE CLAIM NO. 2481 FILED BY UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION ON BEHALF OF SHERELL STANLEY**

The United States Equal Employment Opportunity Commission (“EEOC”) and the City of Detroit, Michigan (the “Debtor”), by and through their undersigned counsel, state as follows in support of the entry of the *Order Withdrawing Duplicate Claim No. 2481* attached hereto as **Exhibit 1.**

1. On February 24, 2014, the EEOC filed a proof of claim [Claim No. 2481] in the amount of \$136,006.55 on behalf of Sherell Stanley.
2. On March 19, 2014, the EEOC filed a modified proof of claim on behalf of Ms. Stanley [Claim No. 3665], also in the amount of \$136,006.55.
3. On July 23, 2014, the City filed a Stay Modification Notice with respect to Claim No. 3665 [Dkt. No. 6240].
4. Upon discussion by the parties, the EEOC has agreed that Claim No. 2481 is duplicative of Claim No. 3665 and agreed to withdraw it.

5. The City and the EEOC each respectively reserves all of their rights with respect to Claim No. 3665.

**WHEREFORE** the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** approving the parties' stipulation.

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 (P73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jsimon@foley.com tdolcourt@foley.com <i>Counsel to the Debtor, City of Detroit Michigan</i></p> <p>Dated: November 5, 2014</p>	<p><b>EQUAL EMPLOYMENT OPPORTUNITY COMMISSION</b></p> <p>By: <u>/s/ Dale Price (w/consent)</u> Kenneth Bird Dale Price (P55578) Senior Trial Attorney 477 Michigan Avenue, Room 865 Detroit, MI 48226 Phone: (313) 226-7808 <a href="mailto:Dale.price@eoc.gov">Dale.price@eoc.gov</a></p> <p><i>Counsel to the Equal Employment Opportunity Commission</i></p>
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# **EXHIBIT 1**

**IN THE UNITED STATES BANKRUPTCY COURT  
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	X	
	:	Chapter 9
IN RE	:	
	:	Case No. 13-53846
City Of Detroit, Michigan,	:	
	:	
DEBTOR	:	Hon. Steven W. Rhodes
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**ORDER APPROVING STIPULATION TO WITHDRAW DUPLICATE CLAIM NO.  
2481 FILED BY UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION ON BEHALF OF SHERELL STANLEY**

This matter having come before the Court on the *Stipulation to Entry of Order Withdrawing Duplicate Claim No. 2481* (the “Stipulation”); the EEOC<sup>1</sup> having filed Claim Nos. 2481 and 3665 in the above-captioned bankruptcy case; the parties having agreed that Claim Nos. 2481 and 3665 are duplicative of each other; and the Court being otherwise fully informed:

**IT IS HEREBY ORDERED THAT:**

1. Claim No. 2481 filed by the EEOC is withdrawn and disallowed in its entirety.
2. Claim No. 3665 filed by the EEOC, asserting a claim in the amount of \$136,006.55, will remain on the Claims Register.
3. Notwithstanding any provision of this Order, the Stay Modification Notice filed by the City will remain in effect with respect to Claim No. 3665.

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

4. Notwithstanding any provision of this Order, the City and the EEOC each respectively reserves their rights with respect to Claim No. 3665.