

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

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	:	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 GENUINE PARTS COMPANY**

Genuine Parts Company (“Genuine Parts”) 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 Genuine Parts Company* attached hereto as **Exhibit 1**.

1. On February 21, 2014, Genuine Parts filed its proof of claim [Claim No. 2342] (the “Claim”) in the amount of \$1,659,379.

2. The Claim sought \$290,241 as a claim under Section 503(b)(9) of the Bankruptcy Code and the remainder, \$1,369,138, as a general unsecured claim.

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

4. Genuine Parts 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 Genuine Parts. 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:

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Dated: December 11, 2014

## **EXHIBIT 1: PROPOSED ORDER**

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
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	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Steven W. Rhodes
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**ORDER APPROVING STIPULATION FOR WITHDRAWAL OF  
SATISFIED CLAIM OF GENUINE PARTS COMPANY**

This matter having come before the Court on the *Stipulation For Withdrawal Of Satisfied Claim Of Genuine Parts Company* (the “Stipulation”); Genuine Parts<sup>1</sup> having filed Claim No. 2342 (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; Genuine Parts having agreed that the Claim has been fully satisfied; and the Court being otherwise fully informed:

**IT IS HEREBY ORDERED THAT:**

1. Claim No. 2342 filed by Genuine Parts 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.

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<sup>1</sup> 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 Genuine Parts 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.