

**IN THE 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 |
| | : | |
| Debtor | : | Hon. Steven W. Rhodes |
| | X | |

**STIPULATION FOR WITHDRAWAL OF
SATISFIED CLAIM OF ATLANTIC COAST POLYMERS INC.**

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

1. On December 23, 2013, Atlantic Coast filed its proof of claim [Claim No. 342] (the “Claim”) in the amount of \$44,000.

2. The Claim alleged \$44,000 as a general unsecured claim.

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

4. Atlantic Coast 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 Atlantic Coast. 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.

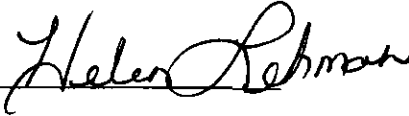
Respectfully submitted by:

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| <p>ATLANTIC COAST POLYMERS INC.</p> <p>By: <u>/s/ Helen Lehman (with consent)</u> Atlantic Coast Polymers, Inc. 6207 Beecaves Road, Suite 180 Austin, TX 78746 Phone: (512) 732-0007</p> <p><i>Representative of Atlantic Coast Polymers, Inc.</i></p> | <p>FOLEY & LARDNER, LLP</p> <p>By: <u>/s/ Jeffrey S. Kopp</u> Jeffrey S. Kopp (P59485) John A. Simon (P61866) Tamar N. Dolcourt (P73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jkopp@foley.com jsimon@foley.com tdolcourt@foley.com</p> <p><i>Counsel to the City of Detroit, Michigan</i></p> |
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Dated: January 30, 2015

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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| <p>ATLANTIC COAST POLYMERS INC.</p> <p>By: /s/ </p> | <p>FOLEY & LARDNER, LLP</p> <p>By: /s/ Jeffrey S. Kopp Jeffrey S. Kopp (P59485) John A. Simon (P61866) Tamar N. Dolcourt (P73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jkopp@foley.com jsimon@foley.com tdolcourt@foley.com</p> <p><i>Counsel to the City of Detroit, Michigan</i></p> |
|---|---|

Dated: January ~~30th~~ 2015

EXHIBIT 1: PROPOSED ORDER

4840-7973-3537.1

**IN THE UNITED STATES BANKRUPTCY COURT
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| CITY OF DETROIT, MICHIGAN, | : | |
| | : | Hon. Steven W. Rhodes |
| Debtor | : | |
| ----- | X | |

**ORDER APPROVING STIPULATION FOR WITHDRAWAL OF
SATISFIED CLAIM OF ATLANTIC COAST POLYMERS INC.**

This matter having come before the Court on the *Stipulation For Withdrawal Of Satisfied Claim Of Atlantic Coast Polymers Inc.* (the “Stipulation”); Atlantic Coast¹ having filed Claim No. 342 (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; Atlantic Coast having agreed that the Claim has been fully satisfied; and the Court being otherwise fully informed:

IT IS HEREBY ORDERED THAT:

1. Claim No. 342 filed by Atlantic Coast 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 Atlantic Coast 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.

4840-7973-3537.1