

**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. Thomas J. Tucker
Debtor	:	
-----	X	

**STIPULATION FOR WITHDRAWAL OF
SATISFIED CLAIM OF THE CITY OF DEARBORN**

The City of Dearborn 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 the City of Dearborn* attached hereto as **Exhibit 1**.

1. On February 12, 2014, the City of Dearborn filed its proof of claim [Claim No. 859] (the “Claim”) in the amount of \$5,476.30.
2. There are no outstanding pre-petition amounts owed to the City of Dearborn by the City.
3. In the ordinary course of its business, the City has paid the City of Dearborn all of the outstanding amounts sought in the Claim.
4. The City of Dearborn hereby withdraws the Claim in its entirety because the Claim has been fully satisfied.
5. 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 the City of Dearborn. Both parties fully reserve all of their respective rights with respect to any other post-petition claims.

4815-5809-6930.1

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>By: <u>/s/ William M. DeBiasi (w/ permission)</u> William M. DeBiasi City of Dearborn, Department of Law 16901 Michigan Ave, Ste 14 Dearborn, MI 48126 Phone: (313) 943-2307 wbebiasi@ci.dearborn.mi.us <i>Counsel to City of Dearborn</i></p>	<p>FOLEY & LARDNER, LLP</p> <p>By: <u>/s/ Jeffrey S. Kopp</u> Jeffrey S. Kopp (P59485) John A. Simon (P61866) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jkopp@foley.com jsimon@foley.com afromm@foley.com <i>Counsel to the City of Detroit, Michigan</i></p>
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Dated: March 10, 2015

EXHIBIT 1: PROPOSED ORDER

4815-5809-6930.1

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**ORDER APPROVING STIPULATION FOR WITHDRAWAL OF
SATISFIED CLAIM OF THE CITY OF DEARBORN**

This matter having come before the Court on the *Stipulation For Withdrawal Of Satisfied Claim Of The City of Dearborn* (the “Stipulation”); the City of Dearborn¹ having filed Claim No. 859 (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; the City of Dearborn having agreed that the Claim has been fully satisfied; and the Court being otherwise fully informed:

IT IS HEREBY ORDERED THAT:

1. Claim No. 859 filed by the City of Dearborn 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 City of Dearborn with respect to any post-petition claims which have arisen or may arise between the parties, other than those sought in the Claim. Both parties fully reserve all of their respective rights with respect to any other post-petition claims.