

**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 SOUTHEAST MICHIGAN COUNCIL OF GOVERNMENTS**

Southeast Michigan Council of Governments (“SEMCOG”) 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 Southeast Michigan Council of Governments* attached hereto as **Exhibit 1**.

1. On February 3, 2014, SEMCOG filed its proof of claim [Claim No. 693] (the “Claim”) in the amount of \$28,130.00.
2. There are no outstanding pre-petition amounts owed to SEMCOG by the City.
3. In the ordinary course of its business, the City has paid SEMCOG all of the outstanding amounts sought in the Claim.
4. SEMCOG 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 SEMCOG. Both parties fully reserve all of their respective rights with respect to any other 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:

<p>By: <u>/s/ Jody Egelton (w/ permission)</u> Jody Egelton Southeast Michigan Council of Governments 1001 Woodward Ave, Suite 1400 Detroit, MI 48226 Phone: (313) 324-3423 egelton@semcog.org</p> <p><i>Finance Manager of Southeast Michigan Council of Governments</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</p> <p><i>Counsel to the City of Detroit, Michigan</i></p>
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Dated: March 16, 2015

EXHIBIT 1: PROPOSED ORDER

4826-9186-9986.1

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**ORDER APPROVING STIPULATION FOR WITHDRAWAL OF
SATISFIED CLAIM OF SOUTHEAST MICHIGAN COUNCIL OF GOVERNMENTS**

This matter having come before the Court on the *Stipulation For Withdrawal Of Satisfied Claim Of Southeast Michigan Council of Governments* (the “Stipulation”); SEMCOG¹ having filed Claim No. 693 (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; SEMCOG having agreed that the Claim has been fully satisfied; and the Court being otherwise fully informed:

IT IS HEREBY ORDERED THAT:

1. Claim No. 693 filed by SEMCOG 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 SEMCOG 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.