

**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,	:		
	:		Hon. Thomas J. Tucker
Debtor	:		
	X		

**STIPULATION FOR ADJOURNMENT OF HEARING ON DEBTOR’S OBJECTION  
TO CLAIM NUMBER 852 FILED BY MICHIGAN AUTO RECOVERY SERVICE**

Michigan Auto Recovery Service (“Michigan Auto”), the holder of Claim Number 852, and the City of Detroit, Michigan (the “City”), by and through its undersigned counsel, hereby stipulate to the entry of the Order attached as **Exhibit 1**, and respectfully request that the Court reschedule the hearing on the City’s Fourteenth Omnibus Objection to Certain Books and Records Claims (Dkt. No. 9569) as to Claim Number 852 only, so that the City can complete its review of Michigan Auto’s recently provided records, for the date listed on Exhibit 1 hereto or as soon thereafter as the Court may determine and grant such other relief as is proper and just.

Respectfully submitted by:

<p><b>THORNBLADH LEGAL GROUP PLLC</b></p> <p>By: <u>/s/ Kurt Thornbladh (w/consent)</u>  Kurt Thornbladh (P25858)  7301 Schaefer  Dearborn, MI 48126  Phone: (313) 943-2678  kthornbladh@gmail.com  <i>Counsel to Michigan Auto Recovery Service</i></p> <p>Dated: May 21, 2015</p>	<p><b>FOLEY &amp; LARDNER, LLP</b></p> <p>By: <u>/s/ Tamar N. Dolcourt</u>  John A. Simon (P61866)  Tamar N. Dolcourt (P73425)  Leah R. Imbrogno (P79384)  500 Woodward Ave., Ste. 2700  Detroit, MI 48226  Phone: (313) 234-7100  jsimon@foley.com  tdolcourt@foley.com  limbrogno@foley.com  <i>Counsel to the City of Detroit, Michigan</i></p>
---	--

**EXHIBIT 1: PROPOSED ORDER**

4828-5120-1315.1

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

**ORDER ADJOURNING HEARING ON DEBTOR’S OBJECTION TO CLAIM  
NUMBER 852 FILED BY MICHIGAN AUTO RECOVERY SERVICE**

Upon the stipulation (the “Stipulation”) of the City of Detroit (the “City”), and Michigan Auto Recovery Services, the holder of Claim Number 852, for entry of an order adjourning the hearing on the City’s Fourteenth Omnibus Objection to Certain Books and Records Claims (Dkt. No. 9569) as to Claim Number 852 only (the “Objection”); and the Court being fully advised in the premises;

THE COURT HEREBY ORDERS that:

1. The hearing on the Objection as to Claim Number 852 only, scheduled to be held on May 27, 2015 at 1:30 p.m., is adjourned to **July 22, 2015 at 1:30 p.m. in Courtroom 1925, 211 W. Fort Street, Detroit, MI 48226.**