

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

	X	
	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Thomas J. Tucker
	X	

**STIPULATION BY AND BETWEEN THE CITY OF DETROIT, MICHIGAN AND
IRON MOUNTAIN INFORMATION MANAGEMENT, LLC REGARDING
EXTENSION OF DEADLINES TO (A) OBJECT TO REQUEST FOR PAYMENT OF
ADMINISTRATIVE EXPENSE AND (B) REPLY TO LIMITED OBJECTION TO
ASSUMPTION OF CONTRACTS AND PROPOSED CURE AMOUNTS**

The City of Detroit, Michigan (“City”) and Iron Mountain Information Management, LLC (“Iron Mountain”; and with the City, the “Parties”), file this Stipulation by and Between the City of Detroit, Michigan and Iron Mountain Information Management, LLC Regarding Extension of Deadlines to (A) Object to Request for Payment of Administrative Expense and (B) Reply to Limited Objection to Assumption of Contracts and Proposed Cure Amounts.

WHEREAS, on January 26, 2015, Iron Mountain filed its Reservation of Rights and Limited Objection to Assumption of Contracts and Proposed Cure Amounts (Doc. No. 9105) (“Objection”), asserting that it is owed a cure amount of \$354,122.06;

WHEREAS, on January 26, 2015, Iron Mountain filed its Request for Payment of Administrative Expenses Pursuant to 11 U.S.C. §503(b)(1) (Doc. No. 9106) (“Administrative Expense Request”), asserting that it is entitled to an administrative expense claim in the amount of \$134,508.32;

WHEREAS, Iron Mountain has also filed a rejection damage claim, a general unsecured claim, and a secured claim in this bankruptcy case (collectively, the “Additional Claims”); and

WHEREAS, the Parties have previously stipulated to extend the deadlines discussed herein (Doc. No. 9793), and the Court has approved this extension (Doc. No. 9795);

WHEREAS, the Parties have been working toward a consensual resolution of the Objection, the Administrative Expense Request, and the Additional Claims, and require additional time to reach this resolution;

NOW, THEREFORE, the Parties stipulate and agree as follows:

1. The City's deadline to file a reply to the Objection is extended through and including August 31, 2015.
2. The City's deadline to file an objection to the Administrative Expense Request is extended through and including August 31, 2015.

STIPULATED AND AGREED TO ON JUNE 23, 2015 BY:

By: /s/ Marc N. Swanson
Jonathan S. Green (P33140)
Marc N. Swanson (P71149)
MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.
150 West Jefferson, Suite 2500
Detroit, Michigan 48226
(313) 963-6420
swansonm@millercanfield.com

ATTORNEYS FOR THE CITY OF DETROIT

By: /s/ Frank F. McGinn
Frank F. McGinn (Mass. BBO # 564729)
HACKETT FEINBERG P.C.
155 Federal Street, 9th Floor
Boston, MA 02110
(617) 422-0200
FFM@bostonbusinesslaw.com

ATTORNEYS FOR IRON MOUNTAIN INFORMATION MANAGEMENT, LLC

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

	X	
	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Thomas J. Tucker
	X	

**ORDER APPROVING STIPULATION BY AND BETWEEN THE
CITY OF DETROIT, MICHIGAN AND IRON MOUNTAIN INFORMATION
MANAGEMENT, LLC REGARDING EXTENSION OF DEADLINES TO
(A) OBJECT TO REQUEST FOR PAYMENT OF ADMINISTRATIVE EXPENSE
AND (B) REPLY TO LIMITED OBJECTION TO
ASSUMPTION OF CONTRACTS AND PROPOSED CURE AMOUNTS**

Upon the Stipulation filed by the City of Detroit, Michigan (“City”) and Iron Mountain Information Management, LLC (“Iron Mountain”) regarding the Extension of Deadlines to (A) Object to Request for Payment of Administrative Expense and (B) Reply to Limited Objection to Assumption of Contracts and Proposed Cure Amounts; and the Court being otherwise advised in the premises;

IT IS ORDERED THAT:

1. The City’s deadline to file a reply to Iron Mountain’s Reservation of Rights and Limited Objection to Assumption of Contracts and Proposed Cure Amounts (Doc. No. 9105) is extended through and including August 31, 2015.

2. The City’s deadline to file an objection to Iron Mountain’s Request for Payment of Administrative Expenses Pursuant to 11 U.S.C. § 503(b)(1) (Doc. No. 9106) is extended through and including August 31, 2015.