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

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| : | Chapter 9 |
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| : | Case No. 13-53846 |
| AN, : | |
| : | Hon. Steven W. Rhode |
| btor : | |
| X | |
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STIPULATION FOR ENTRY OF ORDER REGARDING SETTLEMENT AND WITHDRAWAL OF CLAIM NO. 3633 OF COMPUWARE CORPORATION AND WITHDRAWAL OF CURE OBJECTION

Compuware Corporation ("Compuware") and the City of Detroit, Michigan (the "City"), by and through their undersigned counsel, stipulate as follows in support of the entry of the Order Regarding Settlement and Withdraw of Claim No. 3633 of Compuware Corporation and Withdraw of Cure Objection attached hereto as **Exhibit 1.**

- 1. On February 18, 2014, Compuware filed a proof of claim [Claim No. 1041] in the amount of \$267,508.65.
- 2. On March 6, 2014, Compuware filed an amended proof of claim [Claim No. 3633] (as amended, the "Claim") in the amount of \$241,350.00. Compuware's original Claim No. 1041 was expunged as an amended and superseded claim.
- 3. Upon discussion and review of the records, the parties have determined that the outstanding amount owed on the Claim should be reduced to \$22,875.00 ("Outstanding Claim Amount").
- 4. Compuware also filed its Objection to Proposed Cure Amount (Dkt. 8586) and Cure Amount Objection.

4833-4250-9857.5

- 5. In resolution of Compuware's Claim, the parties have agreed that the City will pay \$11,437.50 on the Claim as a cure amount, in full satisfaction of the Outstanding Claim Amount (the "Settlement").
- 6. In consideration of the Settlement, Compuware agrees to withdraw Claim No. 3633, which constitutes Compuware's only outstanding claim in this bankruptcy, whether for the pre-petition or post-petition period, and to withdraw its Objection to Proposed Cure Amount (Dkt. 8586) with prejudice.

WHEREFORE the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** approving the parties' stipulation.

| Respectfully | submitted | bv: |
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COMPUWARE CORPORATION

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Dated: February 6, 2015