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6th STATE OF MICHIGAN JUDICIAL CIRCUIT JUDICIAL DISTRICT COUNTY	NOTICE OF HEARING AND MOTION	CASE NO. 2017-162642-cz Hon. D. Langford Morris
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Court address 1200 North Telegraph Rd., Pontiac, MI 48341 **Court telephone no.**

Plaintiff name(s)	
MILFORD HILLS PROP., INC AND RPL OF MICHIGAN	
Plaintiff's attorney, bar no., address, and telephone no.	
Frederick Lucas	P29074
7577 US-12, Suite A Onsted, MI 49265	

v

Defendant name(s)	
CHARTER TOWNSHIP OF MILFORD	
Defendant's attorney, bar no., address, and telephone no.	
James E. Tamm	P38154
40701 Woodward Ave, Suite 105 Bloomfield Hills, MI 48304	

NOTICE OF HEARING

- Motion title: Motion to Compel Production of Documents
- Moving party: Frederick Lucas
- This matter has been placed on the motion calendar for:

Judge	Bar no.	Date	Time
Hon. D. Langford Morris		Wed., Nov. 21, 2018	8:30 a.m.
Hearing location			
<input checked="" type="checkbox"/> Court address above <input type="checkbox"/>			

- If you require special accommodations to use the court because of disabilities, please contact the court immediately to make arrangements.

MOTION

order compelling defendants, Charter Township of Milford to answer interrogatories and produce documents and in support of this motion state as follows:

- Plaintiffs served interrogatories and a request for production of documents on defendant on September 11, 2018. A copy of the interrogatories and request for production is attached as Exhibit A and the proof of service is attached as Exhibit B.
- More than twenty-eight days have passed since these discovery requests were served on defendant and defendant has failed to answer the interrogatories or produce documents.
- Defendant's refusal to answer interrogatories or to produce the requested documentation is without substantial justification, and plaintiffs are entitled to costs, expenses, and attorney fees in accordance with MCR 2.313(A)(5)(a).
Plaintiffs request the court to enter an order compelling defendant to produce the requested information and to award plaintiff costs, expenses, and attorney fees.

11/5/2018
Date

/s/ Frederick Lucas
Signature

CERTIFICATE OF MAILING

I certify that on this date I served a copy of this notice of hearing and motion on the parties or their attorneys by first-class mail addressed to their last-known addresses as defined by MCR 2.107(C)(3).

11/5/2018
Date

/s/ Julie Korecki
Signature

FEE

FILED Received for Filing Oakland County Clerk 11/5/2018 9:51 AM