

STATE OF MICHIGAN

IN THE 6<sup>TH</sup> CIRCUIT COURT FOR THE COUNTY OF OAKLAND

MILFORD HILLS PROPERTIES,  
INC., a Michigan Corporation  
and  
RPL of MICHIGAN, INC.,  
a Michigan Corporation.

Plaintiffs,

v

Hon. D. Langford Morris  
Case No. 2017-162642-CZ

CHARTER TOWNSHIP OF MILFORD,  
a Michigan charter township.

Defendant.

---

LAW OFFICE OF PAUL E. BURNS  
Attorney for Plaintiffs  
By: Paul E. Burns (P31596)  
133 West Grand River  
Brighton, Michigan 48116  
(810) 227-5000

O'CONNOR, DeGRAZIA, TAMM  
& O'CONNOR, P.C.  
JAMES E. TAMM (P38154)  
RICHARD V. STOKAN, JR. (P61997)  
Attorneys for Defendant  
40701 Woodward Avenue, Ste. 105  
Bloomfield Hills, MI 48304  
(248) 433-2000

LUCAS LAW, PC  
Co-Counsel for Plaintiffs  
By: Frederick Lucas (P29074)  
7577 US 12, Ste A  
Onsted, Michigan 49265  
(517) 467-4000

---

**NOTICE OF TAKING DEPOSITION DUCES TECUM  
OF GEORGE E. HUBBELL, P.E.**

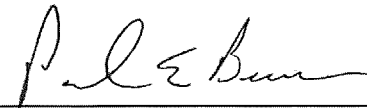
**PLEASE TAKE NOTICE** that the Plaintiff, MILFORD HILLS PROPERTIES, INC., and RPL of MICHIGAN, INC., will take the deposition upon oral examination of George E. Hubbel, P.E., before a Notary Public in and for the County of Livingston, State of Michigan, at the office of Attorney James E. Tamm, O'CONNOR DE GRAZIA TAMM &

FILED Received for Filing Oakland County Clerk 12/17/2018 12:07 PM

O'CONNOR, PC, located at 40701 Woodward Ave., Ste 105, Bloomfield Hills, Michigan, commencing at 1:00 p.m. on Monday, December 17, 2018 and continue thereafter until completed. This deposition will be taken for all purposes authorized under the Michigan Court Rules.

The deponent is directed to bring with him all materials, including, but not limited to the complete file, all memoranda, documents, records, reports, engineering reports, permits, letters, e-mails; including, but not limited to contracts between the Township and R.P.L. of Michigan, Inc. and Milford Hills Properties, Inc., Ridge Valley and/or Bridge Valley Master Association and the Community Sewer System and contracts of any kind or nature relating to the above-referenced cause of action.

LAW OFFICE OF PAUL E. BURNS  
Attorney for Plaintiff



Dated: December 17, 2018

---

PAUL E. BURNS (P31596)  
133 West Grand River  
Brighton, Michigan 48116  
(810) 227-5000