

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

MILFORD HILLS PROPERTIES, INC., a Michigan Corporation, 1042 North Milford Road, Ste. 103, Milford, MI 48381; and RPL of MICHIGAN, INC., a Michigan Corporation, 1042 North Milford Road, Ste. 103, Milford, MI 48381,

Plaintiffs,  
vs.

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

CHARTER TOWNSHIP OF MILFORD,  
a Michigan charter township,

Defendant.

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LAW OFFICE OF PAUL E. BURNS  
Paul E. Burns (P31596)  
Bradford L. Maynes (P68319)  
Attorneys for Plaintiffs  
133 West Grand River  
Brighton, MI 48116  
(810) 227-5000

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O'CONNOR, DeGRAZIA, TAMM  
& O'CONNOR, P.C.  
JAMES E. TAMM (P38154)  
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LUCAS LAW, P.C.  
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Onsted, MI 49265  
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**NOTICE OF TAKING DEPOSITION *DUCES TECUM***

**TO: Attorneys of Record  
US Legal Support**

**PLEASE TAKE NOTICE** that the deposition of **SCOTT CAIRNS** will be taken on **Monday, December 17, 2018, at 12:00 p.m.** and continuing thereafter until completed, at 133 West Grand River, Brighton, MI 48116. The deposition will be taken in accordance with MCR 2.302. This Notice is given as provided in MCR 2.306.

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The deponent is required to bring with him and produce for inspection and copying at the deposition, each and every document and tangible thing in his possession, custody or control which meets the description of any of the following:

1. A current curriculum vitae or resume, including copies of all articles referenced in the curriculum vitae;
2. Any and all written reports that have been prepared in this case;
3. Any and all demonstrative evidence relating to the deponent's opinions;
4. Any and all documents or other things that refer, reflect or relate to the deponent's work in this case, including, without limitation: correspondence, notes, writings, drawings, graphs, charts, photographs, phone records, data reports, work papers, calculations, designs, blueprints, models, reconstructions, or other projects;
5. Any and all research or other materials the deponent has gathered, collected or received in connection with his work in this case;
6. Any document or other thing upon which you intend to rely in support of any opinion you intend to give.

You are invited to attend and cross-examine the witness.

Respectfully submitted,

O'CONNOR, DeGRAZIA, TAMM & O'CONNOR, P.C.

By: /s/ Richard V. Stokan, Jr.

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DATED: December 14, 2018

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**PROOF OF SERVICE**

I hereby certify that on December 14, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the MiFile File & Serve e-filing system which will send notification of such filing to the following: *Paul E. Burns, Esq. and Frederick Lucas, Esq.* **I DECLARE UNDER THE PENALTY OF PERJURY THAT THE STATEMENT ABOVE IS TRUE TO THE BEST OF MY INFORMATION, KNOWLEDGE AND BELIEF.**

/s/ Cheryl A. Pinter  
Cheryl A. Pinter, Legal Secretary  
capinter@odtlegal.com

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